Coating Unlimited
VCP NW 1172

PHASE I ENVIRONMENTAL ASSESSMENT

Industrial Park
18250 - 18430 - 68th Avenue South
Kent, Washington 98032

KEY BANK

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August 8, 2003

JN 23217

Coatings Unlimited, Inc.
c/o Mr. John Wallace
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23250 Pacific Highway South
Kent, Washington 98032

Subject: **PHASE I ENVIRONMENTAL ASSESSMENT**
Industrial Park
18250 - 18430 - 68th Avenue South
Kent, Washington 98032

Gentlemen:

Environmental Associates, Inc., (EAI) has completed a Phase I Environmental Assessment of the subject property located in Kent, Washington. This report, prepared in accordance with the terms of our proposal dated July 18, 2003, and executed on July 23, 2003, and in a manner consistent with the intent and methodologies of ASTM E 1527-00, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", summarizes our approach to the project along with results and conclusions.

The contents of this report are confidential and are intended solely for your use and the use of your representatives. Four (4) copies of this report are being distributed to you. No other distribution or discussion of this report will take place without your prior approval in writing. Additional copies are available for a small fee.

As discussed in detail within appropriate sections of the attached report, the following "recognized environmental conditions" as defined by section 1.1.1 of ASTM E-1527-00 have been identified in have been identified in connection with the subject property:

- Potential historic releases of petroleum products and solvents from a former on-site sump to soil and groundwater on the adjacent property to the south. Approximately 161.39 tons of petroleum-contaminated soil was reportedly excavated from along a portion of the southern property line and from the nearby area on the adjacent property to the south of the site by others (ATC, 1998). Others (ATC) opined that a sump which was located on the subject site

at that time with a line that discharged onto the property adjacent to the south was a likely source of that petroleum product contamination. Results of groundwater sampling and testing by others (ATC, 2000) from three (3) groundwater monitoring wells, located on the adjacent property to the south, revealed a vinyl chloride concentration above the current MTCA Method A cleanup level in one of those wells. ATC opined that the subject property ("CAM Property") may be a likely source of the vinyl chloride contamination discovered on the adjacent property to the south.

- Unknown and unassessed subsurface environmental condition of groundwater with respect to petroleum hydrocarbons proximal to the former location of underground fuel storage tanks on the property, near the northern property boundary.

- Remaining metal-contaminated (concentrations above MTCA cleanup levels) soil beneath a portion of buildings on the property, following excavation and removal of approximately 28 cubic yards of accessible metal-impacted soil by others (HLA, 1991).

Non-CERCLA conditions of potential environmental significance identified at the subject site include:

- Potential PCB-containing fluorescent light ballasts within several of the subject buildings (Bldg. 1, Bldg. 2, Bldg. 2-B, Bldg. 3, Bldg. 3-E, and Bldg. 4 - See Plate 2, Site Plan included with the attached report).

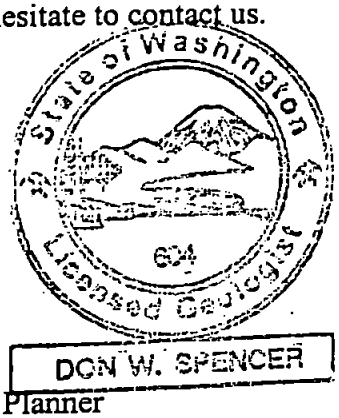
- Presence of "suspect" asbestos-containing building materials in the form of sheet vinyl flooring (4 types), 12-inch square vinyl tile, suspended cellulose ceiling panels, 12-inch square acoustical ceiling tiles (2 types).

In the current use and good condition, neither the fluorescent ballasts nor the suspect asbestos materials appear to represent a threat to public health or to the environment and no action would be required at this time under current state, federal, or local laws or regulations.

Additional discussions along with common-sense recommendations for future management and/or alternative approaches relating to the above-noted conditions or uncertainties are provided for your consideration in the Conclusions/Recommendations section and at other appropriate locations within the attached report.

We appreciate the opportunity to be of service on this assignment. If you have any questions or if we may be of additional service, please do not hesitate to contact us.

Respectfully submitted,
ENVIRONMENTAL ASSOCIATES, INC.



Don W. Spencer, M.Sc., P.G., R.E.A.
Principal

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Registered Site Assessor/Licensed UST Supervisor
State Certification #4132000816

License: 604	(Washington)
License: 11464	(Oregon)
License: 876	(California)
License: 5195	(Illinois)
License: 0327	(Mississippi)

PHASE "1" ENVIRONMENTAL ASSESSMENT

Industrial Park
18250 - 18430 - 68th Avenue South
Kent, Washington 98032

Prepared for:

Key Bank
23250 Pacific Highway South
Kent, Washington 98032

Questions regarding this investigation, the conclusions reached and the recommendations given should be addressed to one of the following undersigned.

James R. Ruff for C.C.
Chris Cass
Environmental Geologist
EPA-Certified AHERA Building Inspector
I.D. # J&J020930-BIR-07
Washington State UST Site Assessor #32-US-32029803

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Reference Job Number: JN 23217

August 8, 2003

ENVIRONMENTAL ASSOCIATES, INC.

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Appendix F - Copies of Selected Pages from Six (6) Reports By Others & WDOE Correspondence for the Adjacent West Valley Business Park Site
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METHODOLOGY/SCOPE OF WORK

Our study approach consisted of completing a series of investigative tasks intended to satisfy the level of effort often referred to as "due diligence" by the "innocent purchaser" in the context of the Superfund Amendment and Reauthorization Act of 1986 (SARA), and nearly identical requirements set forth in the Model Toxics Control Act (MTCA), Chapter 70.105 D (Section 040) RCW pertaining to standards of liability. The objective of a Phase I Assessment is to reduce potential exposure to future liability for environmental problems by demonstrating that at the time of acquisition or financing, the owner, buyer, or lender had no knowledge or reason to know that any hazardous substance had been released or disposed of on, in, or at the property. Moreover, in defining the purpose of the Phase I environmental site assessment process, section 1.1.1 of ASTM E-1527 advises that the goal of a Phase I Assessment is to identify "recognized environmental conditions", and defines a recognized environmental condition 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."

In an effort to evaluate condition and previous uses of the property in a manner consistent with good commercial and customary practice and in accordance with methods outlined under ASTM E 1527-00, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", our scope of work for this study included:

- Review of chronology of ownership and site history using the resources of the King County Assessor's Office, the Washington State Archives, and aerial photography from several time periods as primary resources. This included an attempt to identify possible former industries or uses presenting some potential for generating waste which may have included dangerous or hazardous substances as defined by state and federal laws and regulations.

- Acquisition and review of available reports and other documentation pertaining to the subject site or nearby sites.

- Review of Washington Department of Ecology (WDOE) and King County Department of Public Health documents regarding current and abandoned landfills.

- Review of the current EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), the EPA National Priority List (NPL), the EPA Resource Conservation and Recovery Act (RCRA) Notifiers, RCRA Corrective Action Report (CORRACTS), and Emergency Response Notification System (ERNS) lists of sites which are potentially contaminated or which produce hazardous substances as a normal part of their commercial operation in the vicinity of the site.

- Review of the current Washington Department of Ecology (WDOE) listing of underground storage tanks (USTs) along with the WDOE's Leaking Underground Storage Tank (LUST) listing for WDOE-documented leaking USTs in the vicinity of the subject property.

- Review of the current WDOE Confirmed and Suspected Contaminated Sites (CSCS) list of potentially contaminated sites which have been the subject of hazardous waste investigation and/or cleanup activity in conjunction with the Washington Model Toxics Control Act (MTCA) Chapter 173-340 WAC.

- Review published documents from the Bonneville Power Administration (BPA) to evaluate the risk for naturally occurring radon.

- A reconnaissance of the subject property (including buildings) and neighboring areas to look for evidence of potential contamination in the form of soil stains, odors, asbestos, lead-based paint (LBP), vegetation stress, discarded drums, discolored water, careless manufacturing or industrial practices, etc.

- Preparation of a summary report which documents the assessment process and findings.

FINDINGS

GENERAL DESCRIPTION

The subject property includes a single irregular-shaped parcel (tax parcel number 6407600050) covering approximately 285,265 square feet (6.55 acres) of land. Improvements to the subject property are summarized in the table below:

Building Code (see Plate 2, Site Plan)	Reported Year Constructed	Construction type	Number of Stories	Approximate size (feet^2)	Present Use
Bldg. 1	1965; addition 1980's	Wood-frame	2	10,488	Offices
Bldg. 2	1966	Metal-framed with sheet metal cladding	1	13,260	Painting/finishing shop with sand-blasting room
Bldg. 2-B	circa 1974	Metal-framed	1	1,000	Storage / vehicle maintenance
Bldg. 3 & Bldg. 3-E	1965	Metal-framed	1	59,437	Fabrication/painting/ assembly shops

Building Code (see Plate 2, Site Plan)	Reported Year Constructed	Construction type	Number of Stories	Approximate size (feet²)	Present Use
Bldg. 3-A	1965	Wood-frame	1	2,240	Storage
Bldg. 3-B	circa 1965	Concrete	1	900	Waste paint and solvent storage, new paint storage
Bldg. 3-C	circa 1980	Metal-framed	1	400	New solvent storage
Bldg. 3-D	circa 2002	Metal-framed	1	200	New paint storage
Bldg. 4	1948	Masonry & wood-frame	1	1,775	Office / sign painting shop

Additional improvements include asphalt-paved parking areas and driveways. Currently the property is occupied by several industrial and/or office tenants which include Safe Systems (fabrication activities in west portion of Bldg. 3 and offices in Bldg. 1), TriVitro (glass recycling activities in the central tenant space in Bldg. 3, and the storage yard on the eastern portion of the site, and offices in Bldg. 1), Coatings Unlimited, Inc. (painting/finishing activities in the eastern portion of Bldg. 3, all of Bldg. 2, and offices in Bldg. 1), Coates Heating (assembly of hot tub heaters in Bldg. 3-E and offices in Bldg. 1), CAM Properties (offices in Bldg. 1), and Advertising Ideas Co. (offices and sign painting shop in Bldg. 4). The approximate location of the site is shown on the Vicinity Map, Plate 1, appended herewith.

The property is located in a mixed commercial and industrial area approximately 4 miles to the north-northwest of downtown Kent, Washington. According to the King County Assessor's Office, the subject property is zoned "M-1", and industrial park designation. Photographs reflecting the character of the subject property are provided with this report as Plate 3.

A brief description of land use on nearby parcels is provided below. Plate 2, Site Plan, depicts the setting of the subject property and land use for adjacent sites.

North: The nearby area to the north of the western portion of the site is covered with trees, low-lying vegetation, and grass. A single-family residence is located farther to the north. Two (2) commercial buildings and asphalt-paved parking lots are situated nearby to the north of the eastern portion of the site. The western-most of those commercial buildings is currently occupied by Northwest Scale Systems (office/warehouse) and the eastern-most building is used by offices of Barghausen Consulting Engineers, Inc., and Novastar Development, Inc.

South: The West Valley Business Park is located on a large parcel adjacent to the south of the subject site. This complex includes two (2) large office/warehouse buildings and asphalt-paved parking/loading areas. Tenants in the office/warehouse building closest to the subject property currently include (from west to east): Airpure, Mastersource, vacant spaces, and Yokohama Aerospace.

East: 72nd Avenue South forms the eastern property boundary. A large office/warehouse building, presently occupied by Dreyers (ice cream business), is located beyond to the east. A 2-building complex identified as the "West Valley Industrial Park" is located to the southeast of the site, beyond 72nd Avenue South.

West: 68th Avenue South, also identified as the West Valley Highway, defines the western property boundary. Two (2) vacant commercial buildings, surrounded by asphalt-paved parking lots, are located farther to the west.

GEOLOGIC SETTING

Physiographically, the site is situated on a river plain (Green River Valley) which has formed since the last period of continental glaciation that ended approximately 13,500 years ago.

Published geologic maps for the site vicinity (Luzier, 1969) suggest that much of the material underlying the subject site may be alluvium which may include clay, silt, sand, and gravel. Typically, this material exhibits highly variable vertical hydraulic conductivity depending on the coarseness of the material.

Topographically, the site is situated on a level area approximately 24 feet above sea level. Based upon inference from topography and local drainage patterns, it appears that shallow-seated groundwater in the vicinity of the subject property may locally flow in a westerly direction toward the Green River. Previous environmental work conducted on the property adjacent to the south of the subject property by others suggest that groundwater flow on June 21, 2000 was toward the west-southwest based on groundwater level measurements taken from three (3) monitoring wells on that site (ATC, 2000).

Previous subsurface investigations on the property conducted by others suggests that much of the subsurface soils beneath the northern portion of the site may "...consist of medium brown fine sand with occasional gravel, from the ground surface to approximately 6 feet below ground surface (bgs). Gray-brown silty clay/clayey silts extend from approximately 6 to 10 feet. Soils beneath the silty clay/clayey silt consisted of fine sand" (HLA, 1991).

Previous environmental soil borings and excavation work conducted by others on the northern portion of the property revealed that groundwater was encountered at depths of approximately 7.5 to 11 feet below the ground surface (HLA, 1991). The differences in the groundwater depths may be attributable to seasonal variations in precipitation and infiltration.

With respect to surface water resources, the Green River is located approximately 300 feet to the north of the site. This surface water course flows in a northerly direction, and eventually becomes the Duwamish River which discharges into Elliott Bay of Puget Sound.

DEVELOPMENT HISTORY AND LAND USE

Sources reviewed for information on site and area development and land use included the resources of the King County Assessor's Office, Washington State Archives, and aerial photographs of the subject property and surrounding area from several time periods.

Aerial photographs of the area were reviewed for the years 1946, 1956, 1960, 1968, 1974, 1980, 1990, 1995, 2000, and 2002. The following paragraphs provide an interpretive summary of our observations in each photo. The time intervals between the various historic aerial photographs selected for this particular project are, in our opinion, entirely adequate for the intended purpose which was to permit a general assessment of overall development and land use in the vicinity of the subject property.

1946 The "footprint" of the presently existing 1948-vintage building (Bldg. 4) is seen on the southwestern portion of the subject site. The remaining areas of the site and surrounding areas to the north, east, and south appear as farm fields. An existing residential structure is visible farther to the north of the western portion of the site, with South 182nd Street beyond to the north. 68th Avenue South is apparent adjacent to the west, with a large farm field farther to the west. The region appears mostly undeveloped and agricultural in land use.

1956 The 1948-vintage structure (Bldg. 4) on the property now appears completed and several small out-buildings are now seen nearby to the east of that structure. The remaining areas of the subject site and all surrounding areas appear essentially unchanged.

1960 The subject site and all surrounding areas appear much the same as they did in the previous photograph.

1968 The out-buildings described in the previous photograph nearby to the east of the 1948-vintage structure have been removed. The subject site now appears to contain Bldg. 1, Bldg. 2, Bldg. 3, Bldg. 3-A, Bldg. 3-B, and Bldg. 3-E (see Plate 2, Site Plan) and asphalt-paved parking areas and driveways. The eastern portion of the site appears as a grass-covered storage area. No significant changes are visible to the surrounding areas.

1974 Bldg. 2-B is now seen adjacent to the east side of Bldg. 2 (see Plate 2, Site Plan) on the property. The eastern portion of the site appears as an equipment storage yard. The remaining areas of the subject parcel appear essentially unchanged. Most of the farm fields on the surrounding areas have been replaced with grass fields and/or low-lying vegetation.

1980 Three (3) modular trailers are now seen proximal to Bldg. 1 and Bldg. 4 on the property. Bldg. 3-C is now seen on the southern portion of the site. The currently existing "blast room" has been added to the eastern side of Bldg. 2. A small concrete pad is now seen along the north side of the site, proximal to the former location of underground fuel storage tanks (see Plate 2, Site Plan) north of Bldg. 2. The remaining areas of the site appear essentially unchanged. Two (2) storage yards are now seen adjacent to the north of the eastern portion of the site. Several storage containers are seen on grass-covered and graded areas nearby area to the east of the site. Two (2) currently existing buildings of the "West Valley Industrial Park" are now visible nearby to the southeast of the property. The presently existing large office/warehouse buildings of the "West Valley Business Park" and asphalt-paved parking/loading areas are now seen nearby to the south of the site. Several additional commercial buildings are visible in the site vicinity farther to the south. Grass-covered and graded areas are seen to the west of the site beyond 68th Avenue South. The region generally shows rapidly increasing commercial and industrial development.

1990 The three (3) modular trailers described on the property in the 1980-dated photograph have been removed. An existing 2-story addition is now seen adjacent to the east side of Bldg. 1. The concrete pad along the north side of the site, described in the previous photograph, is no longer visible. The remaining areas of the site and nearby area to the south appear much the same as they did in the previous photograph. A commercial building, currently occupied by Barghausen Consulting Engineers, Inc. and Novastar Development, Inc., is now seen to the north of the eastern portion of the site. 72nd Avenue South is now visible adjacent to the east of the site, with grass, low-lying vegetation, and trees seen farther to the east. Two (2) presently existing vacant commercial buildings and associated asphalt-paved parking areas are now seen to the west of the site, beyond 68th Avenue South.

1995 No significant changes are visible to the subject site and all nearby areas. The region now appears densely developed with commercial buildings.

2000 A small addition is now seen adjacent to the east side of the "blast room" on the property (see Plate 2, Site Plan). The remaining areas of the subject parcel and nearby areas to the west and south appear much the same as they did in the previous photograph. A commercial building presently occupied by Northwest Scale Systems is now seen nearby to the north of the eastern portion of the site. The two (2) storage yards adjacent to the north of the site, described earlier in the 1980-dated photograph, have been replaced with asphalt-paved parking areas. A large office/warehouse building, currently occupied by Dreyers, is now visible to the east of the site, beyond 72nd Avenue South.

INSTRUMENT	OWNER	DATE OF PURCHASE
tax parcel #6407600050		
Assessor record and Archive document	CAM Properties	Prior to January 15, 1965
Archive document	J. Crede Mooers	October 1944
Archive document	Thomas D. Bevan	October 15, 1942
Archive document	Rosemary Mac Dougall	July 18, 1922

Borrowing from the jargon of ASTM, no "reasonably ascertainable" or "likely to be useful" information prior to 1922 was available. The absence of such information has no material effect upon the conclusions of this report.

PREVIOUS ENVIRONMENTAL WORK

On January 14, 1991 Harding Lawson Associates (HLA) presented the findings of a "Phase II Investigation Report" of the subject property to Ms. Cathy Waldron of CAM Properties. A copy of that report was provided to us for our review by the client. Copies of selected pages of that report are included in Appendix B of this report. HLA advised that "The objective of the Phase II investigation was to further evaluate the potential impact of two (2) previous fuel underground storage tanks (USTs) removed in 1987, and the stained soil near the blast room and wet scrubber associated with the existing manufacturing facility on the property". HLA's January 14, 1991-dated report advises they (HLA) presented a "preliminary hazardous materials site assessment" report of the subject property on November 1, 1990. This 1990-dated HLA report was not provided to us for our review during the course of this current Phase 1 effort.

The first area of focus on the property in HLA's "Phase II Investigation" was proximal to the location of two (2) removed fuel USTs (see Plate 2, Site Plan). HLA reported that these USTs had stored "diesel" and "gasoline", respectively. Two (2) soil borings were reportedly advanced, proximal to the former UST locations, to depths of approximately 11.5 feet below the ground surface (bgs) on November 15, 1990, using a truck-mounted hollow-stem auger drill rig. A soil sample from each boring was collected at a depth of approximately 10-to-11.5 feet bgs, and submitted to a laboratory for analysis for total petroleum hydrocarbons (TPH) by test method 8015, along with analysis for benzene, toluene, ethylbenzene, and total xylenes (BTEX) by test method 8020 (HLA, 1991). Groundwater was reportedly encountered at a depth of approximately 7.5 feet bgs in both of the borings. HLA advised that "Observations of the soils encountered did not reveal indications of visual staining, and petroleum odors were not observed". No documentation of sampling and/or analytical testing of groundwater from those borings (if any) was found in our review of the HLA report. Laboratory analysis of the two (2) collected soil samples reportedly revealed a total petroleum hydrocarbon (TPH) concentration of 580 parts-per million (ppm), "as motor oil", in one of the samples, and no detectable concentrations of total diesel- and heavy-oil- range petroleum

hydrocarbons in the other soil sample. A trace concentration (7 parts-per billion) of total xylenes was reported in one of the soil samples. Aside from that detection, BTEX concentrations were reportedly not detectable in those two tested (2) soil samples. HLA concluded on page 4 of their report that "Based on these observations and the fact that sample B1 ["HLA-1" on Plate 2, Site Plan] did not contain detectable concentrations of TPH, the extent of TPH found in soil sample B2 ["HLA-2"] appears to be limited".

The second area of focus on the property in HLA's "Phase II Investigation" was proximal to the "blast room" (see Plate 2, Site Plan), where stained soil had been noted by HLA (HLA, 1991). Three (3) surface soil samples (0-to-3 inches bgs) and three (3) "deeper" soil samples (6-to-9 inches bgs) were reportedly collect from this area and submitted to a laboratory for analysis for the metals barium, cadmium, chromium, copper, lead, nickel, and zinc, and for volatile organic compounds by test method 8240. No detectable concentrations of cadmium were reported in the tested soil samples. Reported concentrations of chromium and lead exceeded MTCA cleanup levels for industrial sites at that time (500 ppm and 1,000 ppm, respectively) in the three (3) tested surface soil samples. Concentrations of chromium and lead in the "deeper" (6-to-9-inches bgs) soil samples were reportedly below the MTCA cleanup levels for industrial sites at that time. Concentrations of toluene and xylenes (18 ppm and 17 ppm, respectively) were reportedly below the proposed MTCA cleanup levels at that time for industrial sites in one (1) of the tested surface soil samples (HLA, 1991). Methylene chloride, acetone, chloroform, 2-butanone, benzene, and ethylbenzene were either reportedly non-detectable or had reported estimated trace concentrations in the tested surface soil samples and the "deeper" (6-to-9-inches bgs) soil samples. Concentrations of toluene and total xylenes report in the "deeper" soil samples (6-to-9-inches bgs) ranged from 3 ppm (estimated) to 6 ppm. HLA opined on page 4 of their report that "Acetone was also found in the laboratory blanks indicating that the presence of this compound is likely attributed to laboratory procedures".

On July 18, 1991 Harding Lawson Associates (HLA) presented an "Independent Cleanup Action Report" for the subject property to Ms. Cathy Waldron of CAM Properties. A copy of that report was provided to us for our review by the client. Copies of selected pages of that report are included in Appendix C of this report. The independent cleanup activities included soil excavation from two (2) separate areas of the property.

The first area of reported soil excavation was proximal to the location of former underground fuel storage tanks (USTs). The Washington Department of Ecology (WDOE) UST database suggests that two (2) USTs of unlisted capacities were removed from the property (listed as CAM Properties at 18250 68th Avenue South). The listed substance stored in one of the tanks was "leaded gasoline". The substance stored in the other UST was not listed in the WDOE UST listing. HLA advised in their report that the tanks had stored gasoline and diesel and were removed in 1987, and that a single soil sample was collected at the time of the removal and laboratory tested for "oil and grease". HLA reported that "The results of this analysis ["oil and grease"] were below the detection limit". Following the results of HLA's January 1991-dated "Phase II Investigation", HLA reportedly observed excavation of petroleum-impacted soils, in the vicinity of the former underground fuel

storage tanks on the property (see Plate 2, Site Plan), by Northwest Enviroservice, Inc. in February 1991. The soil excavation was reportedly terminated at approximately 11 feet below the ground surface (bgs), where groundwater was encountered. No documentation of groundwater sampling and/or laboratory testing was found in our review of the HLA reports. Approximately 17 cubic yards of material excavated from the upper 4 feet of the excavation was reportedly stockpiled separately from approximately 37 cubic yards of material from the remainder of the excavation to approximately 11 feet bgs. Soil samples were reportedly "...collected from both stockpiles, and from the base of the excavation [see HLA-1 and HLA-2 on Plate 2, Site Plan] on February 22, 1991". The soil samples were reportedly laboratory tested by Pacific Northwest Environmental Laboratory, Inc. for total diesel- and heavy oil-range petroleum hydrocarbons by EPA method 8015 (modified). Both of the confirmation soil samples collected from the base of the excavation reportedly had concentrations of diesel and heavy-oil range petroleum hydrocarbons well below the MTCA Method A cleanup level at that time of 200 ppm. The reported concentrations of heavy-oil range petroleum hydrocarbons in those samples was 62 ppm and 58 ppm, respectively. Reported total diesel-range petroleum hydrocarbon concentrations in those samples were less than 27 ppm. A soil sample from the first stockpile (soil removed from the upper 4 vertical feet of the excavation) reportedly had a concentration of 270 ppm as heavy-oil, which exceeded the MTCA Method A cleanup level at that time of 200 ppm. The reported concentration of total diesel- and heavy oil-range petroleum hydrocarbons in the second stockpile (soil removed from beneath 4 feet bgs in the excavation) was reportedly 24 ppm or less, well below the MTCA Method A cleanup level at that time of 200 ppm. Following the results of laboratory soil sample testing, HLA reported that CAM Properties had retained Northwest Enviroservice, Inc. to transport and dispose of the soil in the first stockpile (17 cubic yards) at an approved landfill. The reported approximate dimensions of the excavation was 13 feet (north-to-south), 15 feet (east-to-west) and 11 feet deep (HLA, 1991). HLA reported that soil from the second stockpile (37 cubic yards), "...which was determined not to contain concentrations of TPH in excess of 200 mg/kg [ppm], was used to partially backfill the excavation" (HLA, 1991). No documentation of sidewall sampling/testing (if any) in the excavation was found in our review of the soil excavation activities documented by HLA in 1991.

The second area of reported soil excavation was in the vicinity of the stained soil which HLA had tested in 1990 and found to contain elevated levels of chromium and lead within the upper 6 inches of soil proximal to the "blast room" (see Plate 2, Site Plan) (HLA, 1991). In February and March of 1991, HLA reportedly observed the excavation of approximately 38 cubic yards of metal-impacted soil, to depths of up to approximately 1 foot bgs proximal to the southeastern portion of the "blast room" (see Plate 2, Site Plan, and HLA's Figure 3 in Appendix C). HLA reported that a "black grit material" was encountered in an approximately 1-inch thick layer in the excavated soil near the "blast room" at a depth of approximately 6 to 12-inches bgs. A soil sample from this "black grit material" was reportedly collected and laboratory tested and found to contain concentrations of lead and cadmium (2,820 ppm and 27.3 ppm, respectively) which were above MTCA cleanup levels for industrial sites at that time. HLA reportedly observed the excavation of this "black grit layer", from the collected location of that laboratory-tested sample, "...and [excavation] proceeded in all directions until no further signs of the black grit were observed or until obstructions were

encountered. In general, soil excavation was able to proceed without interruption to the north, east, and south allowing for complete removal of this material. However, soil excavation to the west was terminated due to obstruction by the blast room building foundation and the concrete apron. Soil excavation was conducted right up [to] the building foundation and the edge of the concrete pad" (HLA, 1991). HLA reported that a "thin layer [less than approximately 1-inch thick] of black grit was still present in the soil at a depth of 12-15 inches below the ground surface at some locations along the concrete apron and building foundation. This material appeared to extend below the building foundation and the concrete apron, but further excavation was not possible below these structures" (HLA, 1991). Soil excavation work was reportedly terminated at the edge of the "blast room" foundation and concrete apron (currently the site of an addition to the blast room), and a single soil sample was collected from the sidewall of the excavation proximal to the "concrete apron" (see HLA-3 on Plate 2, Site Plan), and submitted for laboratory analysis. Results of laboratory testing of that sidewall sample revealed that concentrations of cadmium and lead (10.8 ppm and 1,790 ppm, respectively) were above their applicable MTCA cleanup levels for industrial properties. Laboratory testing of a confirmation soil sample collected from the base of the excavation (see sample 10 B of HLA's Figure 3 in Appendix C) revealed concentrations of cadmium, chromium, and lead well below their applicable MTCA Method A cleanup levels for industrial properties. HLA concluded that "removal of the black grit material from these areas [beneath the "blast room" and "concrete apron"] is not technically feasible without demolition of the structures" and "the extent of the metals contamination appears to be limited to a very thin layer of material (< 1-inch thick)". HLA advised on page 5 of their July 1991-dated report that "the grit material should be excavated and properly disposed of or treated if the blast room and concrete apron are eventually demolished (either by CAB Systems, CAM Properties or by subsequent property owners)" (HLA, 1991).

In summary, relying solely upon the information reviewed in the July 1991-dated HLA report, it would appear that cadmium- and lead-contaminated soils proximal to the "blast room" and "concrete apron" have been excavated to the extent practicable, and that an approximately 1-inch thick layer of cadmium- and lead-contaminated "black grit" remains in place at depths of approximately 12-to-15-inches bgs beneath those structures.

On March 23, 2000 TerraSolve presented the findings of a "Final Report" for a "soil analysis project" on the subject property to Mr. Peter Coates. A copy of this report was provided to us for our review by Mr. Coates during our recent site reconnaissance on August 1, 2003. Copies of selected pages of that report are included with this report in Appendix D. The TerraSolve report advises that soil samples collected from five (5) boring locations of the subject property (see TS-1, TS-2, TS-3, TS-4, and TS-5 on Plate 2, Site Plan) were collected and laboratory tested for chlorinated solvents. According to the TerraSolve report, this soil analysis was "...performed with the intent to confirm or deny the potential existence of chlorinated solvents within the soil strata...[beneath the subject property]". Mr. Coates advised us during our recent site visit that the TerraSolve study was performed as a result of concerns of the owner of the adjacent property to the south regarding the discovered presence of "vinyl chloride" in groundwater at that site. Please refer

to the "MTCA" subsection of the "EPA And State Records of Potentially Hazardous Sites" section of this report for further discussions regarding environmental work on the adjacent property to the south (West Valley Business Park site). TerraSolve reported that soil samples were collected during their March 2000 study on the subject property at depths of approximately 2 feet and 12 feet bgs in boring TS-1, 8 feet bgs in boring TS-2, 12 feet bgs in boring TS-3, and 9 feet in bgs in borings TS-4 and TS-5. Laboratory testing by Friedman & Bruya, Inc. of those collected and submitted soil samples by test method 8260B reportedly revealed no detectable concentrations of chlorinated solvents including tetrachloroethene and its degradation products above their detection limits of 5 parts-per-billion. TerraSolve concluded that "The sample results indicate that in the areas sampled there is no indication of contamination by the above-noted chlorinated solvents [Vinyl chloride, Chloroethane, 1,1-Dichloroethene, trans-1,2-Dichloroethene, 1,2-Dichloroethene, 1,1,1-Trichloroethane, Trichloroethane, and Tetrachloroethene]".

SITE RECONNAISSANCE

An environmental geologist/EPA-certified Asbestos Building Inspector from our firm visited the property on August 1, 2003 to review on-site conditions and land use practices in the surrounding area. Mr. Greg Snider of Coatings Unlimited, Inc. provided access to the buildings and grounds. Representative areas reviewed during our site visit included the interior areas of Bldg. 1, Bldg. 2, the western- and eastern-most tenant spaces of Bldg. 3, Bldg. 3-A, Bldg. 3-B, Bldg. 3-C, Bldg. 3-D, and Bldg. 3-E, exterior grounds, and adjacent property exteriors. No access was provided to Bldg. 4 (1948-vintage residential structure which has been converted to an office/sign painting shop) as all of the doors were locked and the tenant was not present at the time of our site visit.

Improvements to the subject property, along with a description of the current tenants/occupants, was summarized earlier in the "General Description" section of this report. Bldg. 1 has a flat built-up roof. Bldg. 4 has a pitched roof clad with asphaltic composition shingles. The roofs of the remaining buildings on the property are pitched and clad with sheet metal.

According to Mr. Snider there are currently no below-ground fuel storage tanks on the property. No obvious, visually discernable evidence to suggest the presence of underground fuel storage tanks (i.e., vent lines, filler caps, etc.) was noted on the property. Similarly, no water wells or groundwater monitoring wells were noted on the property.

Typical building materials and/or conditions observed during our site reconnaissance included:

Bldg. 1 (see Plate 2, Site Plan):

- Floors are concrete (first floor) or wood (second floor) covered with a combination of carpet, sheet vinyl (hallway and restrooms), or 12-inch square vinyl tile (utility room).

- Interior walls throughout the building are painted sheetrock (1980's addition) or wood panels.
- Ceilings are suspended cellulose panels, or 12-inch square acoustical tile (in a portion of the 1st floor lounge).
- Fluorescent light fixtures were noted throughout the building.
- An HVAC system provides heating and cooling.

Bldg. 2 (see Plate 2, Site Plan):

- Floors are bare concrete.
- Interior walls throughout the building are unpainted sheetrock, wood, or sheet metal.
- Ceilings are metal open-web trusses with styrofoam panels between the trusses.
- Incandescent and fluorescent light fixtures were noted throughout the building.
- Several 5-gallon containers of new paints were noted within the building. No cracks, stains, or other signs of leakage or spillage was noted on/near these containers at the time of our site visit.
- A "blast room" was noted adjacent to the east side of the building. A large air compressor is situated on a large concrete pad adjacent to the south of the "blast room".
- A single approximately 1,000-gallon capacity above-ground propane storage tank was noted near the exterior of the southeastern corner of the building.

Bldg. 2-B (see Plate 2, Site Plan):

- Floors are bare concrete.
- Interior walls within the building are unpainted wood or sheet metal.
- Ceilings are stained wood.
- Incandescent and fluorescent light fixtures were noted within the building.
- Five (5) 55-gallon drums labeled "polyurethane" were noted along the interior side of the southern wall of the building. No cracks, stains, or other signs of leakage or spillage was noted on/near these drums at the time of our site visit.

- Two (2) 55-gallon drums of waste oil, one (1) 55-gallon drum of diesel, and one (1) 55-gallon drum of waste antifreeze were noted within a plastic secondary containment unit at the southwestern corner of the building. Labels on the drums of waste oil and antifreeze indicated that they are serviced by Spencer Environmental. Three (3) open and unlabeled 5-gallon capacity containers of waste oil (2 containers) and waste antifreeze (1 container) were noted on the concrete floor proximal to the secondary containment unit. Minor oily-staining (approximately 2 square feet) was noted on the concrete floor proximal to the secondary containment unit. The concrete floor appeared to be in good condition with no significant cracks or floor drains. At present this condition appears to represent a "housekeeping" issue with a relatively small potential in terms of environmental risk to the real property.

- A single approximately 275-gallon capacity above ground storage tank (AST), full of diesel fuel, was noted proximal to the exterior eastern wall of the building, situated on soil. Mr. Snider advised us that the diesel fuel (generated from maintenance activities) stored in this tank will be removed from the premises for lawful off-site disposal.

Bldg. 3 and Bldg. 3-E (see Plate 2, Site Plan):

- Floors are bare concrete.

- Interior walls throughout the building are unpainted sheetrock, wood, or sheet metal.

- Ceilings are metal open-web trusses with styrofoam panels between the trusses.

- Incandescent and fluorescent light fixtures were noted throughout the building.

- Suspended natural gas units provide heating in Bldg. 3-E.

- A very small approximately 1-gallon capacity parts cleaner was noted in a room at the southwestern corner of the building. A shop employee advised us that a non-chlorinated solvent is used in this parts cleaner. No cracks, stains, or other signs of leakage or spillage was noted on/near the parts cleaner at the time of our site visit.

- A bin full of scrap metal was noted near the exterior of the southwestern portion of the building. A label on the bin suggests that scrap metal is lawfully removed from the site by Metals Express, Inc.

- Mr. Snider advised us that no hazardous waste is generated by the glass recycling business (TriVitro) which utilizes the central portion of Bldg. 3 and the storage yard on the eastern portion of the site.

- Several 5-gallon capacity containers of new paints were noted within the eastern portion of the building (area used by Coatings Unlimited, Inc. for industrial painting).

- Three (3) 55-gallon drums were noted on the concrete floor in the eastern portion of the building (Coatings Unlimited, Inc. space). Two (2) of the drums, labeled "methyl ethyl ketone" were approximately one-fourth full. The third drum, labeled "1,1,1-trichloroethene'" was full. No cracks, stains, or other signs of leakage or spillage was noted on/near these drums at the time of our site visit. Mr. Snider advised us that these drums were being temporarily stored within the building and are used at off-site project locations.

Bldg. 3-A (see Plate 2, Site Plan; storage shed):

- Floor is bare concrete.

- Two (2) 55-gallon drums full of used "blast grit" sand were noted in the storage area. Mr. Snider advised us that "steel grit sand" is used in the "blast room" adjacent to the east side of Bldg. 2.

- A 1-gallon capacity container of petroleum-based parts cleaning solution was noted in a storage cabinet within the structure. No cracks, stains, or other signs of leakage or spillage was noted on/near this container at the time of our site visit.

Bldg. 3-B (see Plate 2, Site Plan; storage shed):

- Floor and walls are unpainted concrete.

- Ceilings are sheet metal, painted wood or painted concrete.

- Waste paint, solvent, and rags, generated by Coatings Unlimited, Inc. during their normal course of business activities, are stored in drums within the eastern portion of this structure. A sign posted on the interior side of the western wall of the structure read: "Danger Hazardous Waste". Three (3) 55-gallon drums of waste paint, solvent, and rags were observed in a concrete-bermed area within the western portion of the structure. One of the drums was labeled "liquid paint" and was approximately one-half full. Another drum was labeled "liquid solvent paint" and was approximately one-half full. The third drum was approximately one-eighth full of used rags. No cracks, stains, or other signs of leakage or spillage was noted on/near these drums at the time of our site visit. Mr. Snider advised us that all of these waste materials are lawfully removed from the premises for lawful off-site disposal as needed by Clean Harbors Environmental Services, Inc. Copies of recent waste disposal manifests for "waste paint", "waste paint related material" and "solid hazardous waste" generated by Coatings Unlimited, Inc. were provided to us by Mr. Snider, and are included with this report in Appendix E.

- Several approximately 5-gallon capacity containers of new paints were noted within the eastern portion of the structure. No cracks, stains, or other signs of leakage or spillage was noted on/near these containers at the time of our site visit.

Bldg. 3-C (see Plate 2, Site Plan; storage shed):

The floor within the structure is bare concrete. Walls and the ceiling are clad with sheet metal. The structure is currently used by Coatings Unlimited, Inc. for storage of new non-chlorinated solvents. Four (4) full 55-gallon drums of non-chlorinated solvent were noted within the structure. Several small containers (less than 1 gallon each) of diesel, acetone, or xylene were also noted within the structure. No cracks, stains, or other signs of leakage or spillage was noted on/near these drums or containers at the time of our site visit.

Bldg. 3-D (see Plate 2, Site Plan; metal freight container):

The floor within the freight container is wood. Several approximately 5-gallon containers of new paints were noted within the structure. No cracks, stains, or other signs of leakage or spillage was noted on/near these containers at the time of our site visit.

Bldg. 4 (see Plate 2, Site Plan):

As mentioned earlier, no access was provided to this structure. The interior western-most hallway was viewable through a west-facing window. The floor in that area is covered with carpet, walls are wood panels, and the ceiling is 12-inch square acoustical tiles. Fluorescent light fixtures were noted in that hallway. Exterior walls are painted wood or masonry. Mr. Snider advised us that the current tenant in the building (Advertising Ideas Co.) utilizes the structure for an office and sign painting shop.

CHECK FOR PCB-CONTAINING MATERIALS

Prior to 1979, polychlorinated biphenyls (PCBs) were widely used in electrical equipment such as transformers, capacitors, switches, fluorescent lights (ballasts) and voltage regulators owing to their excellent cooling properties. In 1976, the EPA initiated regulation of PCBs through issues pursuant to the Toxic Substances Control Act (TSCA). These regulations generally control the use, manufacturing, storage, documentation, and disposal of PCBs. EPA eventually banned PCB use in 1978, and adoption of amendments to TSCA under Public Law 94-469 in 1979 prohibited any further manufacturing of PCBs in the United States.

Light Fixtures Fluorescent lights were observed within Bldg. 1, Bldg. 2, Bldg. 2-B, Bldg. 3, Bldg. 3-E, and Bldg. 4. These fluorescent light ballasts could not be unobtrusively or easily disassembled during our site visit. The light fixtures

within Bldg. 4 were inaccessible as no access was provided to the interior areas of that structure. Comparing the construction dates of those buildings (pre-1978) to the chronology of evolution of governing regulations regarding the manufacture and use of PCBs, it is conceivable that some or all of the ballasts in those fluorescent light fixtures may contain PCB's.

Main Service Electrical Transformers

No pad-mounted or pole-mounted electrical transformers were noted on the site.

CHECK FOR ASBESTOS-CONTAINING MATERIALS

During our site review, several types of materials suspected to potentially contain asbestos were observed within the subject building. These materials included sheet vinyl flooring (4 types), 12-inch square vinyl tile, suspended cellulose ceiling panels, 12-inch square acoustical ceiling tiles (2 types). At the time of this writing we were not authorized by the client to sample or test the suspect materials to confirm or deny this presumption. A summary of the suspect materials is provided in the table below:

MATERIAL	LOCATION	CONDITION[1]	APPROXIMATE SQUARE FOOTAGE
Sheet vinyl flooring 1	Hallway in Bldg. 1	Good	300
Sheet vinyl flooring 2	West-most restrooms on 1st floor in Bldg. 1	Good	40
Sheet vinyl flooring 3	East-most restrooms on 1st floor in Bldg. 1	Good	20
Sheet vinyl flooring 4	2nd floor restrooms in Bldg. 1	Good	40
12-inch square vinyl floor tile	Utility room in Bldg. 1	Good	50
Suspended cellulose ceiling panels	Within Bldg. 1 - both floors	Good	10,000
12-inch square acoustical ceiling tiles 1	Northwestern corner of 1st floor lounge in Bldg. 1	Good	20
12-inch square acoustical ceiling tiles 2	West hallway in Bldg. 4	Good	?

Note: 1 - Material condition was evaluated borrowing criteria adopted under the Asbestos Hazard Emergency Response Act (AHERA), 40 CFR, part 763.

REVIEW OF WASHINGTON DOE LISTING OF UNDERGROUND STORAGE TANKS

Review of the current Washington Department of Ecology listing of underground storage tanks (USTs) suggests that the subject property appears on this listing and that two (2) facilities with registered USTs are located within a one-quarter mile radius of the subject property. Information regarding these USTs and their status is provided in the Environmental Database in Appendix A.

The WDOE UST database suggests that two (2) USTs of unlisted capacities were removed from the property (listed as CAM Properties at 18250 68th Avenue South). The listed substance stored in one of the tanks was "leaded gasoline". The substance stored in the other UST was not listed in the WDOE UST listing.

The subject property appears on the current WDOE-listing of "Leaking Underground Storage Tank" (LUST) sites (listed as CAM Properties at 18250 68th Avenue South). The WDOE LUST database suggests that a release of petroleum products, related to a former UST system, to soil at the property was reported to the WDOE on approximately July 31, 1991. WDOE lists the current cleanup status of that release as "Reported Cleaned Up" as of June 1, 1995. Copies of two (2) environmental reports prepared by Harding Lawson Associates (HLA) in January 1991 and July 1991, pertaining to this petroleum product release and soil cleanup activities, were provided to us by the client, and were also found in our research of files at the Northwest Regional Office of the WDOE. No other correspondence, letters, reports, etc. (if any), regarding this reported release of petroleum products at the site was found in our research of files at the Northwest Regional Office of the WDOE. Please refer to the "Previous Environmental Work" and "Conclusions/Recommendations" section of this report for further discussions of this former UST system, the reported petroleum product release, and soil excavation activities conducted by others in the vicinity of the former USTs by others (HLA, 1991).

The closest WDOE-listed UST site relative to the subject property is Western Paper Company located at 7011 South 188th Street. The WDOE UST database suggests that three (3) USTs, two (2) which had stored gasoline and one (1) of unlisted substance stored, have been removed from that site. This facility is located approximately one-fifth of a mile to the south of the subject parcel in an inferred cross-gradient hydrologic position. This site does not appear on the current WDOE listing of "Leaking Underground Storage Tank" sites.

According to the most recent WDOE Leaking Underground Storage Tank (LUST) listing, one (1) facility located within a one-half mile radius of the subject property has reported accidental releases or leakage to the WDOE in the past.

- Howard Cooper Corp., located at 17700 West Valley Highway, is a site of soil contamination by petroleum products. WDOE lists the cleanup status of this facility as "Reported Cleaned Up" as of June 1, 1995. This site is located approximately one-third of a mile to the north of the subject site in an inferred cross-to-down-gradient hydrologic position.

Considering the substantial separation distances and/or inferred hydrologic positions of the off-site WDOE-listed UST/LUST sites in relation to the subject property as positive risk-mitigating factors, it is our opinion that the potential for environmental impairment of the subject property from these off-site localities is low. The approximate locations of the WDOE-documented underground storage tanks within a one-quarter mile radius of the subject property and the listed LUST site within a one-half mile radius of the site are indicated on the Vicinity Map attached to this report as Plate 1.

EPA & STATE RECORDS OF POTENTIALLY HAZARDOUS SITES

Superfund and NPL

Review of the current EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) and National Priority List (NPL) listings revealed one (1) CERCLIS site within a one-half mile radius of the subject site and one (1) NPL site within one mile of the subject property that have been designated as potentially hazardous or eligible for participation in the Superfund cleanup program.

- Western Processing Company, Inc. is an EPA-listed NPL site located approximately three-fourths of a mile to the south-southeast of the subject site in an inferred cross-gradient hydrologic position.

- Chemcentral Seattle, located at 7601 South 190th Street, is an EPA-listed CERCLIS site situated approximately one-third of a mile to the southeast of the property in an inferred up-to-cross-gradient hydrologic position.

CORRACTS

Review of the current EPA Corrective Action Report (CORRACTS) listing revealed that one (1) CORRACTS site is located within one mile of the subject property that has been designated as having a potential release at that property under RCRA.

- Liquid Waste Disposal Company, located at 7113 South 196th Street is an EPA-listed CORRACTS site situated approximately three-fourths of a mile to the south of the subject parcel in an inferred cross-gradient hydrologic position.

Considering the substantial separation distances inferred cross-gradient hydrologic position of the listed RCRA CORRACTS site in relation to the subject property as positive risk mitigation factors, it is our opinion that the potential for environmental impairment of the subject property from this off-site facility is low.

MTCA The Washington Department of Ecology hazardous waste cleanup and investigation program was launched in 1989 as a part of the Model Toxics Control Act (MTCA), Chapter 173-340 WAC, in order to evaluate potential and actual hazards at sites within the state. Of the more than 1,490 sites currently on the program list, twelve (12) are located within a one mile radius of the subject property. These MTCA sites are listed in the "CSCSL" subsection of the Environmental Database in Appendix A.

The subject property appears on the WDOE MTCA listing as "Seaport Fabrication" located at 18250 68th Avenue South. The WDOE MTCA database suggests that soil contamination (concentrations exceeding MTCA cleanup levels) by metals has been confirmed at the site. Soil is listed as "suspected" to be impacted by petroleum products and non-halogenated solvents. Groundwater is listed as "suspected" to be impacted by metals, petroleum products, and solvents. On August 6, 2003 we (EAI) reviewed files pertaining to this site at the Northwest Regional Office of the WDOE. Copies of a "Phase II Investigation Report" and an "Independent Cleanup Action Report" prepared by Harding Lawson Associates (HLA) were provided to us for our review by the client, and were also found in our research of files at the Northwest Regional Office of the WDOE. Both of these reports were discussed earlier in detail within the "Previous Environmental Work" section of this report. Additional information found in our research of files at the Northwest Regional Office of the WDOE included an "early notice letter" from the WDOE addressed to CAB Systems, Inc. dated October 29, 1991 which advises that the WDOE had added the subject property to its MTCA database, based upon information which had been submitted to the WDOE. Please refer to the "Previous Environmental Work" and "Conclusions/Recommendations" sections of this report for additional discussions regarding the confirmed presence of metal-contaminated soils at the property.

Mr. Peter Coates (current property owner) advised us during our recent site visit on August 1, 2003 that previous environmental reports pertaining to the subject property, including HLA's 1991-dated reports, have not been submitted for a detailed review by the WDOE through the Voluntary Cleanup Program, for the intent of achieving a status of "no further action" for the property with regard to soils contaminated by heavy metals remaining beneath site structures.

The closest WDOE-listed MTCA site relative to the subject property is West Valley Business Park, located adjacent to the south of the subject property at 18401 72nd Avenue South. The WDOE MTCA database suggests that contamination of groundwater by petroleum products at that site has been confirmed. The WDOE MTCA database suggests that soil at that site was impacted by petroleum products and has been remediated.

Six (6) environmental reports pertaining to the south-adjacent West Valley Business Park (WVBP) MTCA site were reviewed by us (EAI) at the Northwest Regional Office of the WDOE on August 6, 2003. These reports included:

1) "Limited Subsurface Investigation", prepared by ATC Environmental, Inc. (ATC), and dated January 6, 1997.

2) "Re: Limited Groundwater Investigation", prepared by ATC Environmental, Inc., and dated February 11, 1997.

3) "Re: Additional Soil Sampling at Compressor", prepared by ATC Environmental, Inc., and dated May 28, 1997.

4) "Phase I Environmental Site Assessment and Limited Phase II Activities", prepared by Versar, Inc. (Versar), and dated November 24, 1998.

5) "Independent Remedial Action Report, Petroleum-Contaminated Soil Remediation", prepared by ATC Associates, Inc., and dated February 3, 1999.

6) "Re: Groundwater Sampling and WDOE File Review (Reference Previous Field Activity Report 'Monitoring Well Installation and Groundwater Sampling Survey, May 2000')", prepared by ATC Associates, Inc., and dated August 17, 2000.

Relying upon the information reviewed in the above-referenced reports, it appears that diesel- and heavy-oil range petroleum hydrocarbon- contaminated soils and groundwater was confirmed in 1997 by ATC on the WVBP property, adjacent to the south of the subject site. Groundwater impacts (concentrations above MTCA Method A cleanup levels) from chlorinated solvents were reportedly discovered at the WVBP site in 1998 (Versar, 1998).

ATC reportedly initially investigated that site in 1997 at the request of R.J. Hallissey Co., Inc. (property manager) in response to "concerns regarding the presence of a concrete-lined sump [located on the subject property] with a pipe discharging at the project area [northern portion of the WVBP site]" (see approximate location of this former sump on Plate 2, Site Plan). ATC opined that the most likely source of the petroleum-contaminated soil discovered on the WVBP site was the property located adjacent to the north (the subject property) (ATC, 1997). Laboratory testing of soil samples, collected from four (4) locations on the northern portion of the WVBP site, for volatile organic

compounds and RCRA 8 metals reportedly revealed either no detectable concentrations or concentrations well below MTCA Method A cleanup levels for those analytes at that time.

ATC advised that soil excavation activities were reportedly conducted in 1998, which included the removal and lawful off-site disposal of approximately 161.39 tons of petroleum-impacted soils from that site, proximal to the shared property boundary with the subject property. ATC reported that this removed petroleum-impacted soil was removed from two (2) separate areas.

The first soil excavation area was proximal to the former sump located on the subject property (see Plate 2, Site Plan) and extending to the south along or near the shared property boundary (ATC, 1999) (see approximate excavation limits on ATC's Figure 6 - "excavation and sample location plan - eastern area" in Appendix F of this report). This area was reportedly excavated to depths of up to 6 feet bgs near the sump.

ATC reported that "debris" encountered during the excavation activities, proximal to the shared property boundary and the former sump on the property, included "metal machine turnings and crushed paint cans that are consistent with the type of activities observed at CAM Properties [the subject site]". Relying upon a figure which depicts the approximate excavation limits (ATC, 1999 - see copy of ATC's Figure 6 in Appendix F), it would appear that the excavation limits of the impacted soils extended onto the subject property. Laboratory testing of several confirmation soil samples revealed either no-detectable concentrations or concentrations below MTCA cleanup levels of 200 ppm at that time for total diesel- and heavy oil-range petroleum hydrocarbons.

The second area of excavation was reportedly entirely on the WVBP site proximal to a "compressor equipment shed", where a separate release of petroleum products had been discovered (ATC, 1997 and 1999). That area was reportedly excavated to a maximum depth of approximately 3.5 feet bgs. Laboratory testing of ten (10) confirmation soil samples collected from that excavation reportedly revealed no detectable concentrations of total diesel- or heavy-oil-range petroleum hydrocarbons (ATC, 1999).

A letter of from the WDOE was issued to AMB Property, L.P on August 30, 1999 which advises that "...Ecology is issuing this determination that no further remedial action is necessary only for the soil portion of this site [WVBP site] under MTCA, chapter 70.105D RCW". The letter further advises that "A 'further action' determination will be placed on the groundwater portion of the site."

Sampling and laboratory testing of groundwater collected from three (3) Geoprobe soil borings on the northern portion of the WVBP property (see B-1, B-2, and B-3 on ATC's February revealed 1997-dated "Drawing No. 1 - Site Plan included with this report in Appendix F) reportedly revealed concentrations of diesel-range petroleum hydrocarbons which were below the MTCA Method A cleanup levels at that time (ATC, 1997). However, two (2) of those groundwater samples contained concentrations of diesel-range petroleum hydrocarbons which slightly exceed the current MTCA Method A cleanup level of 500 ppb. A reported detection of 1,290 ppb of heavy-oil was reported in one (1) of those tested groundwater samples, which exceeded the MTCA Method A cleanup level at that time of 1,000 ppb. Heavy-oil range petroleum hydrocarbons were reportedly not detected in the other two (2) tested groundwater samples above the reporting limit of 750 ppb (ATC, 1997). Laboratory testing of those groundwater samples for volatile organic compounds reportedly revealed either no detectable or trace concentrations of those analytes.

Laboratory testing of groundwater samples in 1998, collected from four (4) locations of the northern portion of the WVBP site from test pits at depths of approximately 14 to 15 feet bgs (see copy of Versar's Figure 3 - "Soil Excavation and Groundwater Sampling Locations" included in Appendix F of this report), had revealed concentrations of 1,2-Dichloroethane of 2 ppb, 680 ppb, 21 ppb, and 9 ppb, respectively (Versar, 1998). The reported detection of 680 ppb of 1,2-Dichloroethane is well above the MTCA Method A cleanup level of 5 ppb for groundwater. Versar concluded that "Site [WVBP site] groundwater is impacted by actionable levels of VOC's [volatile organic compounds]. Evidence indicates the source for the VOC's is the adjacent property to the north (CAM Fabricating Systems) [the subject property]. Versar recommends that groundwater monitoring wells be installed to confirm the presence of contaminated groundwater, and to confirm the direction of groundwater flow. Upon confirming the groundwater conditions beneath the Site [WVBP site], Versar recommends that the local regulatory agency be petitioned to designate the Site [WVBP site] for off-site source determination, or equivalent, status" (Versar, 1998).

Sampling on June 21, 2000 and laboratory testing of groundwater for volatile organic compounds, by EPA test method 8260, from three (3) groundwater monitoring wells reportedly installed in May 2000 on the WVBP site revealed a concentration of vinyl chloride of 24 parts-per-billion (ppb) from one (1) of those groundwater samples (from monitoring well MW-2) which exceeded the MTCA Method A cleanup level of 0.2 ppb (ATC, 2000) (see approximate locations of those three (3) monitoring wells MW-1, MW-2, and MW-3 in ATC's Figure 2 - "Groundwater Contours", included in Appendix F of this

report). The results of laboratory testing of samples collected from the other two (2) monitoring wells reportedly revealed no detectable concentrations of volatile organic compounds in those samples. No documentation of laboratory testing for petroleum hydrocarbons from the samples collected from those monitoring wells (if any) was found in our review of the WDOE files.

ATC advised on page 1 of their August 17, 2000-dated report that "Based on groundwater level measurements taken on June 21, 2000, groundwater flow was toward the West and Southwest, which is generally consistent with previous observations. The monitoring well elevations were surveyed by Michael Hotes of Barghausen Consulting Engineers, Inc. in May 2000". Additional documentation (i.e. report, letter, etc.) of that monitoring well survey conducted by Barghausen Consulting Engineer, Inc. was not found in our (EAI's) review of files at the WDOE.

The most recent information regarding this MTCA site found in our file research at the WDOE included a written correspondence between the WDOE and Mr. Steve Campbell (Vice President, Transactions at AMB Property Corporation) dated September 26, 2000 and September 27, 2000 (see copy of this correspondence sheet in Appendix F). The WDOE advised in their correspondence that "Steve has to resolve his own 3rd party liability issues; neighborly agreement; legal measures". The correspondence indicates that the WDOE advised Mr. Campbell to "Try contacting [the] neighbor [subject property owner] and compel them to take action or pursue legal action". Finally, the correspondence indicates that a letter from AMB Property Corporation (owner of the WVBP site) dated September 18, 2000 "states [that the] suspected source [of the vinyl chloride contamination] may not be identified by Ecology, but [the] report states [that the] suspected source is CAM Properties, listed as Seaport Fabrication on Ecology's Confirmed and Suspected Contaminated Sites list."

As a footnote, ATC's May 28, 1997-dated report advises that Pacific Specialty Construction, Inc. (PSCI) presented an environmental report to CAM Properties on April 2, 1997, which opined that "petroleum-impacted soil and groundwater revealed by ATC's investigations were the result of an air bleed off-vent which discharges under a stairwell next to the project area building [north-most building on the West Valley Business Park Site]" (ATC, 1997). No copies of this April 2, 1997-dated report were found in our research of files at the Northwest Regional Office of the WDOE, nor was this report provided to us by the owner for our review during the course of the Phase 1 effort. In response to PSCI's reported opinion, ATC advised in their May 1997-dated report that "PSCI indicated that the air bleed-off vent was within 4 linear feet of the ATC's

sampling point HA-2. The bleed-off vent is actually approximately 30 liner feet from HA-2" (ATC, 1997). ATC concluded "...that, based on the distance from HA-2 and the chromatogram comparison, the compressor bleed-off and stairwell bleed-off areas are not a source of the petroleum hydrocarbon impact at the HA-2 sample point" (ATC, 1997).

In summary, relying upon the information reviewed in the WDOE files, it may be reasonable to consider that a potential risk of liability exposure to third party claims may exist for the subject property related to chlorinated solvent groundwater contamination discovered by others on the adjacent property to the south. Please refer to the "Conclusions/Recommendations" section of this report for further discussions of this issue.

RCRA/FINDS/ TSDs

Review of EPA's Treatment, Storage and Disposal (TSD) facilities listing for sites that treat, store, or dispose of potentially hazardous materials revealed that no TSD sites are located within a one-half mile radius of the subject property.

Review of the EPA's RCRA Generator and Facility Index System (FINDS) listings, revealed that the subject property appears on these listings as "Coatings Unlimited, Inc. Kent", located at 18420 68th Avenue South, Suite No. 110. The facility is listed as a "large quantity generator" of potentially hazardous materials. The RCRA Generator database suggests that this on-site facility had ten (10) reported violations ("written informal" ; "generator-general requirements") in September-to-October 1997. The RCRA Generator database indicates that compliance with the violated regulations ("generator-general requirements") was achieved by November 26, 1997. No additional information regarding these reported regulation violations was found in our research of files at the Northwest Regional Office of the WDOE.

Further review of the RCRA Generator and FINDS listings revealed ten (10) sites within a one-quarter mile radius of the subject property which are regularly monitored by EPA/WDOE for the use or generation of small amounts of hazardous substances as a normal part of their business activities. The sites located within a one-quarter mile radius of the subject site are listed in the Environmental Database in Appendix A.

ERNS

Review of the EPA's Emergency Response Notification Systems (ERNS) list for the State of Washington revealed that the subject site has not reported a spill. This list has been compiled with periodic updates since October 1987.

LANDFILLS

A review of WDOE and King County Health Department documents regarding current and abandoned landfills revealed that there are no documented landfills located within a one-half mile radius of the subject property.

CONCLUSIONS/RECOMMENDATIONS

As summarized briefly in the executive summary offered in the cover letter to this report, the following "recognized environmental conditions" as defined by section 1.1.1 of ASTM E-1527 have been identified in connection with the subject property:

- Potential historic releases of petroleum products and solvents from a former on-site sump to soil and groundwater on the adjacent property to the south. Approximately 161.39 tons of petroleum-contaminated soil was reportedly excavated from along a portion of the southern property line and from the nearby area on the adjacent property to the south of the site by others (ATC, 1998). Others (ATC) opined that a sump, which was located on the subject site at that time, with a line that discharged onto the property adjacent to the south was a likely source of that petroleum product contamination. Results of groundwater sampling and testing by others (ATC, 2000) from three (3) groundwater monitoring wells, located on the adjacent property to the south, revealed a vinyl chloride concentration above the current MTCA Method A cleanup level in one of those wells. ATC opined that the subject property ("CAM Property") may be a likely source of the vinyl chloride contamination discovered on the adjacent property to the south.

- Unknown and unassessed subsurface environmental condition of groundwater with respect to petroleum hydrocarbons proximal to the former location of underground fuel storage tanks on the property, near the northern property boundary.

- Remaining metal-contaminated (concentrations above MTCA cleanup levels) soil beneath a portion of buildings on the property, following excavation and removal of approximately 28 cubic yards of accessible metal-impacted soil by others (HLA, 1991).

Non-CERCLA conditions of potential environmental significance identified at the subject site include:

- Potential PCB-containing fluorescent light ballasts within several of the subject buildings (Bldg. 1, Bldg. 2, Bldg. 2-B, Bldg. 3, Bldg. 3-E, and Bldg. 4 - See Plate 2, Site Plan included with this report).

- Presence of "suspect" asbestos-containing building materials in the form of sheet vinyl flooring (4 types), 12-inch square vinyl tile, suspended cellulose ceiling panels, 12-inch square acoustical ceiling tiles (2 types).

Additional discussions along with common-sense recommendations for future management relating to the above-noted conditions are provided for your consideration in the following individual subsections.

POTENTIAL HISTORIC RELEASE TO ADJACENT PROPERTY FROM AN ON-SITE SOURCE

As discussed in detail earlier in this report, relying upon the information prepared by others and reviewed in the files at the Northwest Regional Office of the Washington Department of Ecology (WDOE), it appears that diesel- and heavy-oil range petroleum hydrocarbon- contaminated soils and groundwater was confirmed in 1997 by ATC on the WVBP property, adjacent to the south of the subject site. This adjacent property to the south was identified as the "West Valley Business Park" (WVBP) site in the WDOE's listing of "Confirmed and Suspected Contaminated Sites" (CSCS) listing. Groundwater impacts (concentrations above MTCA Method A cleanup levels) from chlorinated solvents were reportedly discovered at the WVBP site in 1998 (Versar, 1998). Others (ATC) opined that a sump, which was located on the subject site at that time (see Plate 2, Site Plan), with a line that discharged onto the property adjacent to the south was a likely source of that petroleum product and solvent contamination.

As discussed in the "Previous Environmental Work" section of this report, Mr. Peter Coates (current owner of the subject property) advised us during our recent site visit that an environmental soil study conducted by TerraSolve on the subject site in 2000 was performed in response to concerns of the owner of the adjacent property to the south regarding the discovered presence of "vinyl chloride" in groundwater at that site. TerraSolve concluded in their March 2000-dated report that "The sample results indicate that in the areas sampled [five (5) boring locations on the subject property - see Plate 2, Site Plan] there is no indication of contamination by the above-noted chlorinated solvents [Vinyl chloride, Chloroethane, 1,1-Dichloroethene, trans-1,2-Dichloroethene, 1,2-Dichloroethene, 1,1,1-Trichloroethane, Trichloroethane, and Tetrachloroethene]". Groundwater conditions were not discussed in the March 2000-dated TerraSolve report.

As discussed in the "MTCA" subsection of this report, the most recent information regarding the adjacent West Valley Business Park MTCA site found in our file research at the WDOE included written correspondence between the WDOE and Mr. Steve Campbell (Vice President, Transactions at AMB Property Corporation) dated September 26, 2000 and September 27, 2000. The WDOE advised in the correspondence that "Steve has to resolve his own 3rd party liability issues; neighborly agreement; legal measures". The correspondence indicates that the WDOE advised Mr. Campbell to "Try contacting [the] neighbor [subject property owner] and compel them to take action or pursue legal action".

In summary, relying solely upon the information reviewed in the WDOE files, it would appear that a potential risk of liability exposure to future third party claims may conceivably exist for the subject property related to chlorinated solvent groundwater contamination discovered by others on the adjacent property to the south.

In addition, as discussed earlier in this report ATC reported that "debris" encountered during the excavation activities, proximal to the shared property boundary and the former sump on the property, included "metal machine turnings and crushed paint cans that are consistent with the type of activities observed at CAM Properties [the subject site]". Relying upon a figure which depicts the approximate excavation limits by others in October 1999 (ATC, 1999 - see copy of ATC's Figure 6 in Appendix F), it would appear that the excavation limits of the impacted soils extended onto the subject property.

The purpose of this discussion is merely to inform the client of this issue as an un-quantified potential exposure to third party liability. If any degree of confidence is desired by the lender, owner, or other interested parties regarding the environmental condition of both soil and groundwater beneath the subject site, in particular near the southern shared property boundary, with respect to chlorinated solvents, petroleum products, and metals, subsurface soil and groundwater sampling and laboratory testing could be performed at multiple locations in an effort to determine whether or not those contaminants are present. Given the incomplete nature of the on-site environmental information, and the potential liability exposure, that is our recommendation at this time.

HISTORIC RELEASE FROM FORMER ON-SITE FUEL USTS

As discussed earlier in this report, the subject property appears on the current Washington Department of Ecology (WDOE) listing of "Leaking Underground Storage Tank" (LUST) sites. The WDOE lists the cleanup status of the site as "Reported Cleaned Up" for soil. As mentioned earlier in this report, HLA advised in their 1991-dated "Phase II Investigation Report" that the tanks had stored gasoline and diesel and were removed in 1987. Following the discovery of heavy oil-range petroleum hydrocarbons in 1991 by HLA in a soil sample collected proximal to the former UST locations at a concentration above the MTCA cleanup level at that time of 200 parts-per-million (ppm), approximately 17 cubic yards petroleum-impacted soil was reportedly excavated from that area. Following the over-excavation of an addition approximately 37 cubic yards of soil from that location, laboratory tested soil samples collected from the base of the excavation reportedly had concentrations of diesel and heavy-oil range petroleum hydrocarbons well below the MTCA Method A cleanup level at that time of 200 ppm.

Groundwater was reportedly encountered in the excavation at a depth of approximately 11 feet below the ground surface (bgs) where the excavation was terminated. No documentation of groundwater sampling proximal to the former fuel USTs was found in our review of HLA's 1991-dated reports. In WDOE's Guidance for Site Checks and Site Assessments for Underground Storage Tanks,

document 90-52 published in February 1991 and revised in October 1992, section 5.3 advises that "groundwater samples must be collected during a site check or site assessment" if "Field instruments indicate that a release may have occurred and the lowest point of the UST system, including piping, is within two feet of the seasonal high water table". Acknowledging that groundwater had reportedly been encountered at a depth of 7.5 feet bgs (HLA, 1991), and laboratory testing of soils had confirmed the presence of heavy-oil-range petroleum hydrocarbons proximal to the former UST location, it would appear likely that the base of the former UST system was within 2 feet of the seasonal high water table.

Relying solely upon the information collected and reviewed during the course of this investigation, and upon our own substantial professional experience with similar sites in the region, it is our opinion that if parties were to submit the 1991-dated HLA reports to the WDOE through the "Voluntary Cleanup Program" for an application of a "No Further Action" status for the site pertaining to the former USTs (to have the site removed from the WDOE's "LUST" listing), and if ecology followed its own guidance documents, it is conceivable that the WDOE could require sampling and laboratory testing of groundwater proximal to the former UST locations, in an effort to determine whether or not impacts to groundwater have occurred from the reported past release of petroleum products.

The property owner advised us that all available previous environmental reports, correspondence, investigation summary letters, etc., have not been submitted to the WDOE for review under the current Voluntary Cleanup Program (VCP) in an effort to obtain a finding of "no further action" from the WDOE related to this past release.

If some degree of confidence is desired by the lender, owner, or other interested parties, limited subsurface groundwater sampling and laboratory testing could be performed at locations proximal to the former UST locations, in an effort to determine whether or not impacts from the reported petroleum product release are present in groundwater. Decision-making authority in this regard clearly rest with the lender, owner, or other involved parties, depending upon their individual risk tolerances. If compliance and consistency with section 5.3 of the WDOE's Guidance for Site Checks and Site Assessments for Underground Storage Tanks, document 90-52 published in February 1991 and revised in October 1992, is desired, then that is our recommendation.

HISTORIC RELEASE OF "BLAST-GRIT" TO SOIL

As discussed in detail earlier in the "Previous Environmental Work" section of this report, relying solely upon the information reviewed in the July 1991-dated HLA report, it would appear that cadmium- and lead-contaminated soils proximal to the "blast room" and "concrete apron"on the property have been excavated to the extent practicable by others, and that an approximately 1-inch thick layer of cadmium- and lead-contaminated "black grit" remains in place at depths of approximately 12-to-15-inches bgs beneath those structures (HLA, 1991). Mr. Peter Coates (current

property owner) advised us during our recent site visit on August 1, 2003 that previous environmental reports pertaining to the subject property, including HLA's 1991-dated reports, have not been submitted for a detailed review by the WDOE through the Voluntary Cleanup Program, with the intent of achieving a status of "no further action" for the property with regard to remaining metal-impacted soils beneath those structures.

With regard to the continued presence of the subject property on the WDOE's CSCSL (MTCA) listing for the reason discussed above, the following management alternatives are offered for your consideration:

(1) The lender, owner, or other involved parties could, without benefit of further site study or review by regulatory agencies such as the Washington Department of Ecology (WDOE), jointly agree to presume that the liability is low, both in terms of (a); the dollar risk posed by soil conditions at the location of the remaining metal-impacted soil beneath the building, and/or in terms of (b); the low likelihood that WDOE or others would later impose a requirement for additional site study or cleanup remediation at that location. Under this scenario, the lender, owner, or other involved parties would then move forward with orderly completion of the pending financial/real estate transactions.

The perceived benefit of such an expedient solution may lie simply in being able to proceed without delay or additional immediate costs. Again, detractions from acceptance of this solution obviously could include future claims for extra costs or other liabilities in the event that the underlying presumptions are later found incorrect for some reason and that some form of cleanup or other action is imposed.

As it stands today, the status of the site in terms of public record is that it remains on the WDOE "CSCSL" (MTCA) listing without benefit of agency review or official resolution such as a determination of "no further action" (NFA). Relying upon the previously documented efforts to remove contaminated soil to the maximum extent practicable by others (HLA, 1991), it would be our opinion (subject to WDOE review) that if the reports and other data developed to date were submitted to WDOE for review, it would appear unlikely that further soil cleanup action would be imposed by them at this time.

(2) The lender, owner, or other involved parties could submit all available reports, correspondence, investigation summary letters, etc., to the WDOE for review under the current Voluntary Cleanup Program (VCP) in an effort to obtain a finding of "no further action" from the WDOE. Following WDOE review, if a finding of "no further action" is issued to the site, related to the remaining metal-impacted soil beneath the building, the property would then be removed from the CSCSL listing and no further investigation of the property would be warranted with regard to the cleanup action already undertaken at that location at the facility. The reader should be aware that if the WDOE concluded that further action is necessary following their review, additional investigation of the property may be required in an effort to document to the WDOE whether or not the property is in compliance

with applicable soil, surface water, sediment and groundwater cleanup levels. As alluded to in the preceding paragraph, it has been our experience that when a site is listed by WDOE with suspected impacts to a particular media, then sampling and analysis of that media would be required to confirm that the media has indeed not been impacted by the suspected contaminant. In this case, groundwater sampling and analysis may be required by the WDOE to obtain a finding of "no further action" if this approach is selected.

Alternative #2 may offer the greatest confidence or predictability in terms of long term resolution of uncertainties, however decision-making authority with respect to applicability, selection, and/or implementation of one of the aforementioned alternatives or other approaches clearly lies with the property lender, owner, or other involved parties, depending upon their individual risk tolerances. The parties must also bear in mind that entry into the formal approach outlined as (2) above is typically attended by the ponderously slow action of the WDOE inherent in such types of bureaus. That factor may (or may not) be a relevant consideration for parties to the current pending financial/real estate transaction(s).

PCBS

Based upon the information developed during the course of our site review, it appears that some or all of the transformer ballasts in the fluorescent lights in several of the subject buildings (Bldg. 1, Bldg. 2, Bldg. 2-B, Bldg. 3, Bldg. 3-E, and Bldg. 4 - See Plate 2, Site Plan included with this report) may contain polychlorinated biphenyls (PCBs).

In our opinion, there is no immediate cause for concern regarding the potential for PCB-containing light ballasts. The only likely potential for exposure to PCBs would come in the event that one of the sealed ballasts were ruptured through abusive handling or as a result of a defect in a ballast.

It may be prudent to implement a management policy providing the inspection of ballasts by maintenance personnel during routine bulb changing activities. Ballasts may be periodically checked or replaced depending upon long-term management desires. Please refer to the attached EPA pamphlet, Appendix H, regarding appropriate handling and disposal practices for such ballasts.

ASBESTOS

Borrowing evaluation criteria adopted under the Asbestos Health Emergency Response Act (AHERA, 40 CFR Part 763), the sheet vinyl flooring (4 types), 12-inch square vinyl tile, suspended cellulose ceiling panels, 12-inch square acoustical ceiling tiles (2 types) are in "good" condition. In the current use and condition, these materials do not appear to represent a threat to public health or to the environment and no action would be required at this time under current state, federal, or local laws or regulations.

To reduce exposure to potential future liability, and in an effort to comply with regulations regarding the suspected presence of asbestos in commercial buildings under Chapter 296-62-07753 WAC, it may be prudent to consider implementation of a management policy (Operations and Maintenance Program/O&M) whereby all maintenance, repair, or service personnel who may be engaged to work on the property are formally advised (i.e., signed acknowledgment) as to the "suspected" presence of asbestos-containing materials (ACM) prior to commencement of any work associated with the ACM.

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

FORMER USE OF HEATING OIL

As noted earlier in the report, archive records suggest that Bldg. 4 (1948-vintage structure) located on the southwestern portion of the subject property (see Plate 2, Site Plan) was historically heated via a "pressure oil burner" and a hot water "allen boiler". No additional information regarding the configuration of the storage vessel (above ground or below ground) logically used to store the heating oil utilized by the burner/boiler was provided in our review of archive documents. In addition, no evidence of vent lines or fill ports that would otherwise suggest the presence of underground storage tanks was observed during our recent site reconnaissance on August 1, 2003.

Our research of WDOE and/or other readily available/reasonably ascertainable public resources revealed no definitive information regarding the exact location, type (above- or below-ground), configuration or fate of the potential storage vessel used to store heating oil for the burner/boiler, and/or the environmental condition of subsurface soil and/or groundwater, with respect to petroleum products, proximal to Bldg. 4. This lack of data is not surprising or unusual given the age of the structure, and the non-uniformity of application of tank registry and environmental regulations over the years in Washington.

Subtitle I of the Resource Conservation and Recovery Act (RCRA), and the preamble to 40 CFR, parts 280/281 (EPA underground tank regulations) specifically exclude "tanks storing heating oil for consumptive use on the premises where stored" from regulation. In contrast, Chapter 173-340 et seq., provides definition of liability along with specific cleanup criteria for petroleum hydrocarbons (oil, gasoline, etc.) in soils irrespective of the cited federal exclusion for heating oil tanks.

Assessment of subsurface soil and/or groundwater conditions cannot typically be accomplished through visual examination of surficial conditions afforded by the scope of our Level I Assessment effort, nor was such a determination envisioned as a task included in the scope of our proposal.

For this specific case, several factors are acknowledged which lead us to a rather "common sense" recommendation for no further action at this time.

1) As mentioned above, there are no records documenting the actual location, existence, or type (above or below ground) of oil storage vessels which historically served the previously existing structure (Bldg. 4) located on the southwestern portion of the subject site. This information vacuum could translate to a very high cost/benefit ratio in the event that subsurface explorations were initiated, particularly in view of the limitations of access imposed by the existing building and the highly intrusive nature of subsurface exploration.

2) The relatively small volume of heating oil stored in a "typical" private residential heating oil tank along with the relatively low overall volume consumed in a given season translates to a substantially lower perceived overall environmental risk when compared to a commercial UST system such as a gas station containing multiple large capacity tanks.

3) There is no legal requirement to conduct such a random search under state or federal law at this time.

Decision making authority with respect to acceptance of the no-action recommendation for the reasons outlined above clearly rests with the owner and/or lender, depending upon their individual risk tolerances.

In the event that small heating oil tank such as discussed here is encountered in the course of future construction or redevelopment, the tank should be removed and disposed of in a manner protective of worker safety and public health as described in API UST Bulletin 1628 or otherwise addressed in applicable state regulations and guidelines. Soil conditions and quality at the time of removal should be documented by appropriate soil sampling and testing in an effort to assess whether or not that at the completion of the work, soil quality is compatible with guidelines set forth under Chapter 173-340 et seq., WAC.

IMPROPERLY STORED MATERIALS

As discussed earlier in the "Site Reconnaissance" section of this report, several small uncovered containers of waste oil and antifreeze were noted proximal to the southwestern corner within Bldg. 2-B. These containers present the risk of spilling their contents by accident. Minor oily-staining (approximately 2 square feet) was noted on the concrete floor proximal to these containers. At present this condition appears to represent a "housekeeping" issue with a relatively small potential in terms of environmental risk to the real property. As a prudent risk mitigating measure, we

recommend lawful labeling, removal and proper disposal of these waste materials from the premises as soon as practicable, and placement of all drums in Bldg. 2-B on/within the secondary containment bin presently located within that structure.

LIMITATIONS

This report has been prepared for the exclusive use of Key Bank, along with Coatings Unlimited, Inc. and their several representatives for specific application to this site. Our work for this project was conducted in a manner consistent with that level of care and skill normally exercised by members of the environmental science profession currently practicing under similar conditions in the area, and in accordance with the terms and conditions set forth in our proposal dated July 18, 2003. Conclusions and opinions offered here pertaining to subsurface conditions rely solely upon results of sampling and testing conducted by others at separated sampling localities and conditions may vary between sampling localities or at other locations and depths. The environmental condition of subsurface soil, groundwater, and/or subsurface appurtenances cannot typically be determined by visual examination of surficial conditions such as afforded by the scope of a Phase I Assessment such as performed here. Acknowledging that limitation, no warranty in that regard is made. For areas to which no access was granted, no conclusions or warranties are rendered with respect to conditions or materials which may exist in those areas. EAI understandably makes no warranty as to the accuracy or reliability of the opinions rendered by other parties cited herein. No other warranty, expressed or implied, is made. If new information is developed in future site work which may include excavations, borings, studies, etc., Environmental Associates, Inc., must be retained to reevaluate the conclusions of this report and to provide amendments as required.

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

REFERENCES

GENERAL

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ATC Environmental, Inc. (ATC), May 28, 1997, Re: Groundwater Sampling & WDOE File Review (Reference Previous Field Activity Report "Monitoring Well Installation and Groundwater Sampling Survey, May 2000"), West Valley Business Park, 18401 & 18601 - 72nd Avenue South, Kent, Washington. Project No. 18118.0102. 4 pps., 3 figures, attachments. Prepared for Mr. Steve Campbell of AMB Property, L.P.

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TerraSolve, March 23, 2000, TerraSolve-99-2583, Soil Analysis Project, 18250 68th Avenue South, Kent, Washington 98032. 4 pps., 1 figure, attachments. Presented to Mr. Peter Coates.

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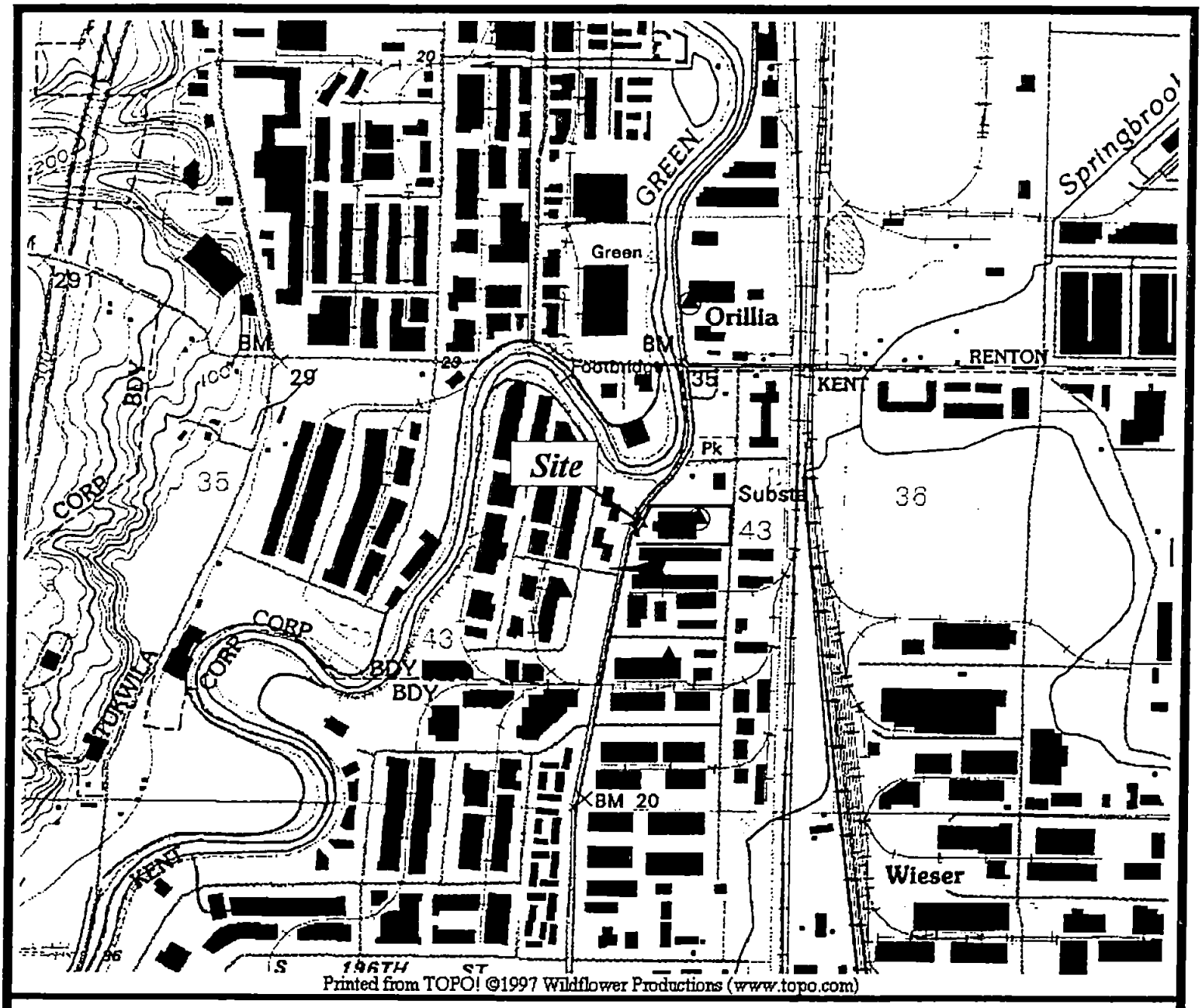
U.S. Geological Survey, 1949, Renton, Washington, 1:24,000 Quadrangle. Photorevised 1968 and 1973, 1 sheet.

Versar, Inc., November 24, 1998, Phase I Environmental Site Assessment & Limited Phase II Activities, West Valley Business Park, 18401-18657 - 72nd Avenue South, Kent, Washington 98032. Prepared for AMB Property, L.P.

Washington Department of Ecology, August 30, 1999, Re: Independent Remedial Action, West Valley Business Park, 18401 & 18601 - 72nd Avenue South, Kent, Washington. 3 pages letter issued to Mr. Matt Leedham and Mr. Steve Campbell of AMB Property, L.P., and to Mr. Neil R. Gilham of ATC Associates, Inc.

DATABASE

Please refer to the Environmental Database in Appendix A for information regarding the governmental database resources reviewed for this project, the ASTM search radius (the search radius used for this project), and the date that the agency produced the listing. The April 30, 1985-dated King County landfill list reviewed for this project should not be construed by the report user or reviewers as out-of-date. It is simply the last date of issuance of the list selected by the government agencies, ASTM not withstanding. The RCRA/FINDS listing provided by the EPA Region NW includes the following databases: RCRIS Large Quantity Generators; RCRIS Small Quantity Generator, Permit Compliance System (PCS); Airs Facility System (AIRS/AFS); Section Seven Tracking System (SSTS); National Compliance Database (NCDB); Enforcement Docket System (DOCKET); Contractor Listing (CONTR LIST); Criminal Docket (CRIM DOCKE); Federal Facility Information System (FFIS); Chemicals in Commerce Information System (CICIS); State Systems (STATE); PCB Activity Handler Activity Data System (PADS); Toxic Chemical Release Inventory System (TRIS), and; Dunn & Bradstreet (DUNS).



▲ **Approximate Location of WDOE-Listed UST Site**

Approximate Location of WDOE-Listed LUST Site

Inferred Shallow-Seated Groundwater Flow

Approximate Site Location

N

Scale
1:12,000

Contour Interval 25 Feet

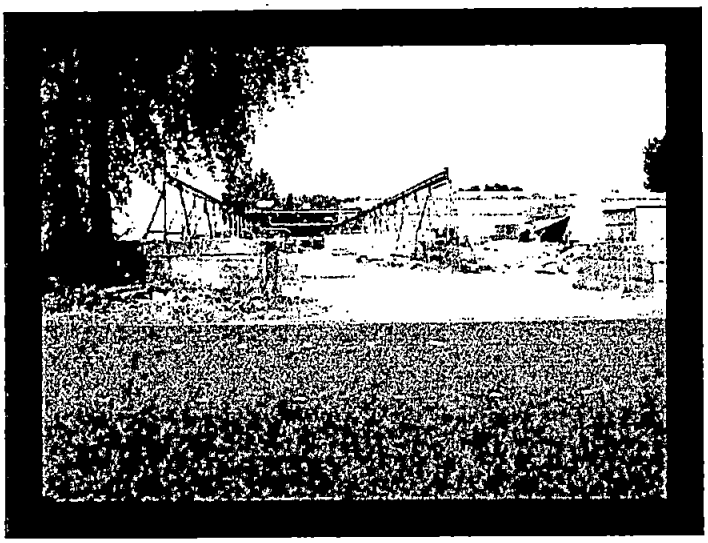
ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue N.E., Ste. 300
Bellevue, Washington 98004

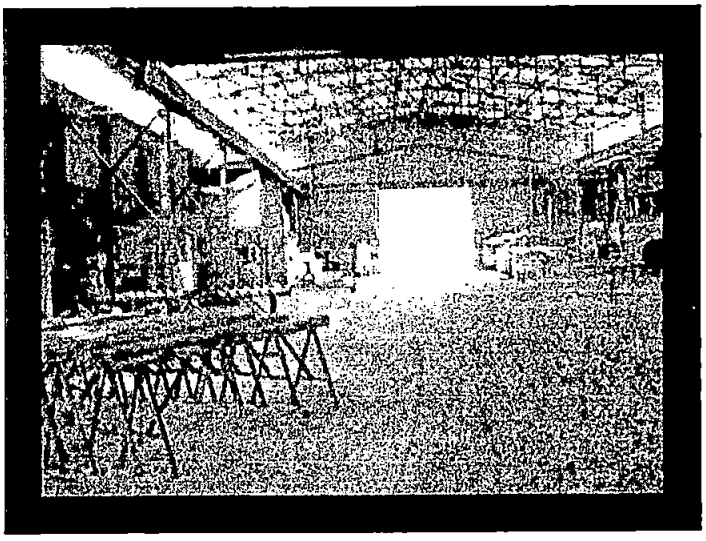
Vicinity Map

Industrial Complex
18250 - 18430 68th Avenue South
Kent, Washington

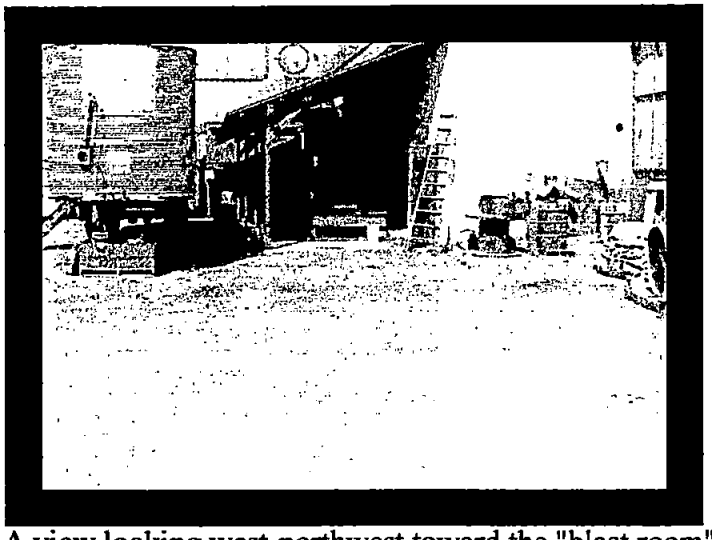
Job Number:	*Date:*		*Plate:*
JN 23217	August 2003		1



A view of the subject property looking west from across 72nd Avenue South.



An interior view looking north within Bldg. 2.



A view looking west-northwest toward the "blast room" and area of metal-impacted soil excavation reportedly conducted by others (HLA, 1991). Inaccessible metal-impacted soil reportedly remained beneath the structures seen on the right side of the photograph.

ENVIRONMENTAL ASSOCIATES, INC.

1380 - 112th Avenue N.E., Ste. 300
Bellevue, Washington 98004

SITE PHOTOGRAPHS

Industrial Complex
18250 - 18430 68th Avenue South
Kent, Washington

Job Number:	*Date:*		*Plate:*
JN 23217	August 2003		3

APPENDIX A

Environmental Database

EXECUTIVE SUMMARY

TARGET PROPERTY INFORMATION

ADDRESS

18420 68TH AVENUE SOUTH
KENT, WA 98032

COORDINATES

Latitude (North):	47.437100 - 47° 26' 13.6"
Longitude (West):	122.245500 - 122° 14' 43.8"
Universal Tranverse Mercator:	Zone 10
UTM X (Meters):	556893.4
UTM Y (Meters):	5253796.5
Elevation:	21 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property:	2447122-D2 RENTON, WA
Source:	USGS 7.5 min quad index

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following government records. For more information on this property see page 6 of the attached report:

Site	Database(s)	EPA ID
CAM PROPERTIES 18250 68TH AVE S KENT, WA 98032	LUST	N/A
COATINGS UNLIMITED INC KENT 18420 68TH AVE S STE NO 110 KENT, WA 98032	FINDS RCRIS-LQG	WAD009247107
CAM PROPERTIES 18250 68TH AVE S KENT, WA 98032	WA ICR UST	N/A
SEAPORT FABRICATION KENT 18250 68TH AVE S KENT, WA 98032	CSCSL	N/A

EXECUTIVE SUMMARY

DATABASES WITH NO MAPPED SITES

No sites were found in an online review and analysis by ENVIRONMENTAL ASSOCIATES, INC. of EDR's search of available ("reasonably ascertainable") government records either on the target property or within the ASTM E 1527-00 search radius around the target property for the following databases:

FEDERAL ASTM STANDARD

Proposed NPL..... Proposed National Priority List Sites
CERC-NFRAP..... CERCLIS No Further Remedial Action Planned
RCRIS-TSD..... Resource Conservation and Recovery Information System
ERNS..... Emergency Response Notification System

STATE ASTM STANDARD

HSL..... Hazardous Sites List
SWF/LF..... Solid Waste Facility Database
INDIAN UST..... Underground Storage Tanks on Indian Land

FEDERAL ASTM SUPPLEMENTAL

CONSENT..... Superfund (CERCLA) Consent Decrees
Delisted NPL..... National Priority List Deletions
HMIRS..... Hazardous Materials Information Reporting System
MLTS..... Material Licensing Tracking System
MINES..... Mines Master Index File
NPL Liens..... Federal Superfund Liens
PADS..... PCB Activity Database System
DOD..... Department of Defense Sites
RAATS..... RCRA Administrative Action Tracking System
TRIS..... Toxic Chemical Release Inventory System
TSCA..... Toxic Substances Control Act
SSTS..... Section 7 Tracking Systems
FTTS..... FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

STATE OR LOCAL ASTM SUPPLEMENTAL

SPILLS..... Reported Spills
EMI..... Washington Emissions Data System

EDR PROPRIETARY HISTORICAL DATABASES

Coal Gas..... Former Manufactured Gas (Coal Gas) Sites

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

EXECUTIVE SUMMARY

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. EDR's definition of a site with an elevation equal to the target property includes a tolerance of +/- 10 feet. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property (by more than 10 feet). Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

FEDERAL ASTM STANDARD

NPL: Also known as Superfund, the National Priority List database is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund program. The source of this database is the U.S. EPA.

An online review and analysis by ENVIRONMENTAL ASSOCIATES, INC. of the NPL list, as provided by EDR, and dated 04/30/2003 has revealed that there is 1 NPL site within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
WESTERN PROCESSING CO. INC	***7215 S 196TH ST***	***1/2 - 1 S***	***0***	***10***

CERCLIS: The Comprehensive Environmental Response, Compensation and Liability Information System contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).
CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

An online review and analysis by ENVIRONMENTAL ASSOCIATES, INC. of the CERCLIS list, as provided by EDR, and dated 06/16/2003 has revealed that there is 1 CERCLIS site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CHEMCENTRAL SEATTLE	***7601 S 190TH ST***	***1/4 - 1/2 SE***	***24***	***31***

CORRACTS: CORRACTS is a list of handlers with RCRA Corrective Action Activity. This report shows which nationally-defined corrective action core events have occurred for every handler that has had corrective action activity.

An online review and analysis by ENVIRONMENTAL ASSOCIATES, INC. of the CORRACTS list, as provided by EDR, and dated 03/31/2003 has revealed that there is 1 CORRACTS site within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
LIQUID WASTE DSPL CO	***7113 S 196TH***	***1/2 - 1 S***	***E29***	***45***

EXECUTIVE SUMMARY

RCRIS: The Resource Conservation and Recovery Act database includes selected information on sites that generate, store, treat, or dispose of hazardous waste as defined by the Act. The source of this database is the U.S. EPA.

An online review and analysis by ENVIRONMENTAL ASSOCIATES, INC. of the RCRIS-SQG list, as provided by EDR, and dated 05/09/2003 has revealed that there are 10 RCRIS-SQG sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
TROJAN LITHOGRAPH CORP	*18405 72ND AVE S*	*0 - 1/8 SE*	*7*	*19*
BARGHAUSEN CONSULTING ENGINEER	*18215 72ND AVE S*	*0 - 1/8 NNE*	*8*	*19*
FACTORY TRAWLER SUPPLY	*7058 S 188TH*	*1/8 - 1/4 S*	*C11*	*21*
UNITED BRAKE SYSTEMS INC	*7050 S 188TH ST*	*1/8 - 1/4 S*	*C12*	*21*
WESTERN METAL ARTS CO	*7042 S 188TH W VALLEY C*	*1/8 - 1/4 S*	*C13*	*21*
BAYWOOD CABINET INC	*7034 S 188TH ST*	*1/8 - 1/4 S*	*C14*	*22*
CARPENTER CO KENT BRANCH	*7007 S 188TH ST*	*1/8 - 1/4 S*	*15*	*23*

Lower Elevation	Address	Dist / Dir	Map ID	Page
SAYBOLT INC TUKWILA	*18251 CASCADE AVE S*	*1/8 - 1/4 WNW*	*9*	*20*
BOEING A&M SOUTHCENTER	*18300 CASCADE AVE S*	*1/8 - 1/4 W*	*10*	*20*
ZEP MFG CO TUKWILA	*18417 CASCADE AVE S*	*1/8 - 1/4 WSW*	*17*	*25*

STATE ASTM STANDARD

CSCSL: The State Hazardous Waste Sites records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. The data come from the Department of Ecology's Confirmed & Suspected Contaminated Sites List.

An online review and analysis by ENVIRONMENTAL ASSOCIATES, INC. of the CSCSL list, as provided by EDR, has revealed that there are 12 CSCSL sites within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
WEST VALLEY BUSINESS PARK	18401 72ND AVE S	0 - 1/8 S	B5	17
STERNOFF METALS CORPORATION	1600 SW 43RD ST	1/4 - 1/2 NNE	23	28
HYDRAULIC REPAIR & DESIGN INC	*6942 S 196TH ST*	*1/2 - 1 S*	*28*	*41*
LIQUID WASTE DSPL CO	*7113 S 196TH*	*1/2 - 1 S*	*E29*	*45*
BOEING NORTHWARD LOT 4	72ND AVE S / S 196TH	1/2 - 1 S	E30	49
WESTERN PROCESSING	*7215 S 196TH ST*	*1/2 - 1 S*	*31*	*51*
S 192ND KENT	*1311-1427 S 192ND ST*	*1/2 - 1 SE*	*32*	*53*
US PRINTING INK CORP	17300 W VALLEY FREEWAY	1/2 - 1 N	33	54
MILL CREEK SITE	W VALLEY HWY / S 196T	1/2 - 1 SSW	34	57
TALLY PRINTER CORP.	*8301 S. 180TH ST.*	*1/2 - 1 ENE*	*35*	*57*
BOEING RENTON BLDG 7-81-2	801 41ST ST SW	1/2 - 1 ENE	36	58

Lower Elevation	Address	Dist / Dir	Map ID	Page
NC MACHINERY CO SEATTLE BRANCH	*17025 W VALLEY HWY*	*1/2 - 1 N*	*27*	*37*

EXECUTIVE SUMMARY

LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Ecology's Leaking Underground Storage Tanks Site List.

An online review and analysis by ENVIRONMENTAL ASSOCIATES, INC. of the LUST list, as provided by EDR, and dated 07/07/2003 has revealed that there is 1 LUST site within approximately 0.5 miles of the target property.

Lower Elevation	Address	Dist / Dir	Map ID	Page
HOWARD COOPER CORP	*17700 WEST VALLEY HWY P*	*1/4 - 1/2NNW*	*22*	*27*

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Ecology's Statewide UST Site/Tank Report.

An online review and analysis by ENVIRONMENTAL ASSOCIATES, INC. of the UST list, as provided by EDR, and dated 03/07/2003 has revealed that there are 2 UST sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
WESTERN PAPER CO	7011 S 188TH	1/8 - 1/4 S	C16	24
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
UNOCAL CORPORATION	18449 CASCADE AVE S	1/8 - 1/4 SW	18	25

VCP: Sites that have entered either the Voluntary Cleanup Program or its predecessor Independent Remedial Action Program.

An online review and analysis by ENVIRONMENTAL ASSOCIATES, INC. of the VCP list, as provided by EDR, and dated 06/30/2002 has revealed that there is 1 VCP site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
WEST VALLEY BUSINESS PARK	*18401 72ND AVE. S.*	*0 - 1/8 SSW*	*B6*	*18*

FEDERAL ASTM SUPPLEMENTAL

RODS: Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid the cleanup.

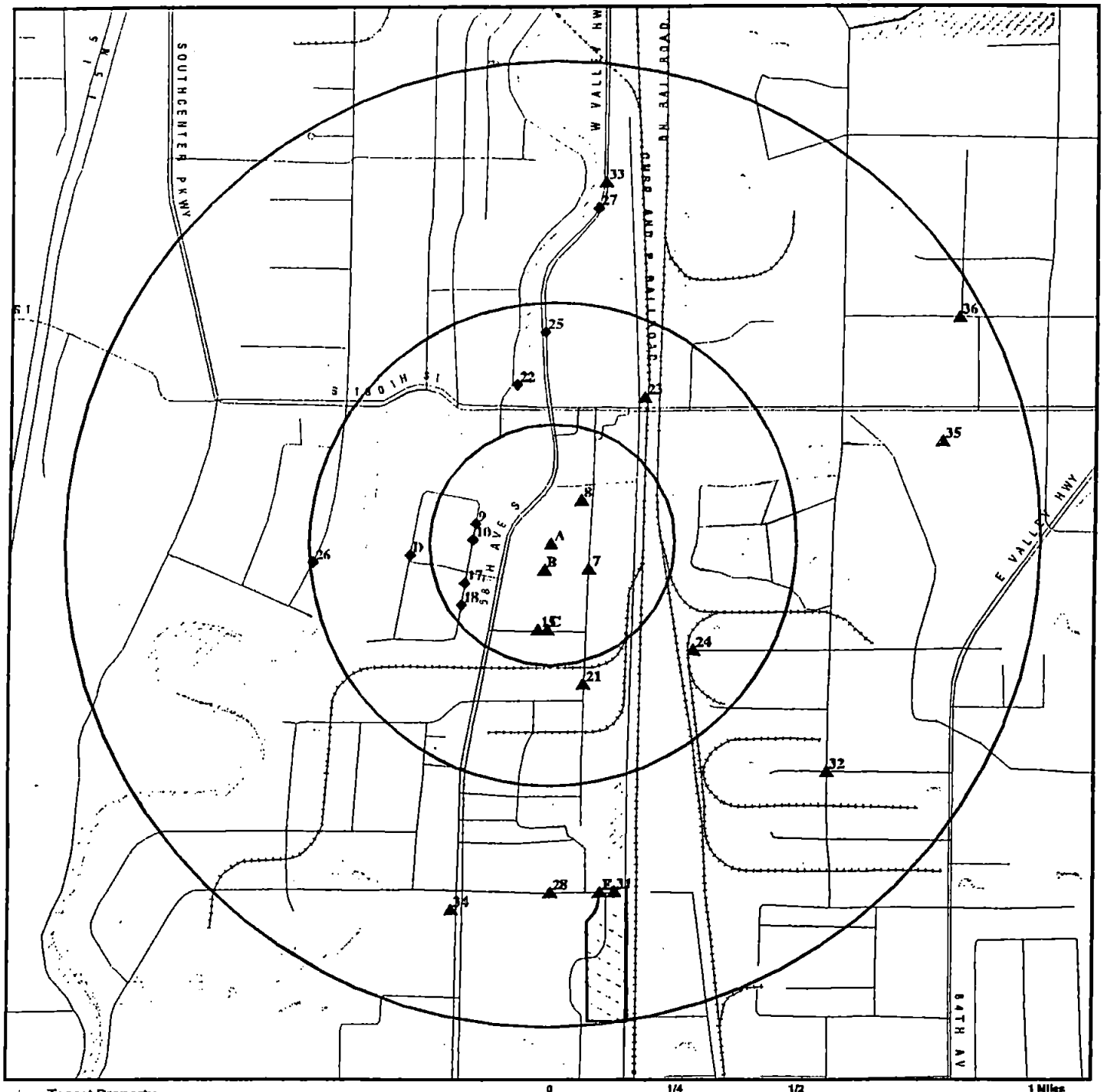
An online review and analysis by ENVIRONMENTAL ASSOCIATES, INC. of the ROD list, as provided by EDR, has revealed that there is 1 ROD site within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
WESTERN PROCESSING CO. INC	*7215 S 196TH ST*	*1/2 - 1 S*	*0*	*10*

DOLLAR RENT A CAR	UST
ARCO AM/PM MINI MARKET	UST
SEGALE BUSINESS PARK	UST
WDOT BRIDGE 127 SR167	RCRIS-SQG, FINDS
HWY 167 WILLIS KENT	RCRIS-SQG, FINDS
GARRISON CREEK PARK	RCRIS-SQG, FINDS
TITUS TOOL CO	RCRIS-SQG, FINDS
JAPANESE AUTO SALES & SERVICE	RCRIS-SQG
AGFA CORP	RCRIS-SQG, FINDS
SR TECHNICS PALMDALE INC SEATAC	RCRIS-SQG, FINDS
M & M FINISHERS INC	RCRIS-SQG, FINDS
ARCO 5515 PSI 5526	RCRIS-SQG, FINDS
TUKWILA CITY PACIFIC HY BRG	RCRIS-SQG, FINDS
WEST VALLEY HWY ACCIDENT	RCRIS-SQG, FINDS
INDUSTRIAL RESEARCH PRODUCTS	FINDS
INDUSTRIAL RESEARCH PRODUCTS	FINDS
EXXON #7 3383 (TWO REPORTS)	WA ICR
KENT CITY SHOP AREA	WA ICR
OLYMPIC PIPELINE 1989 KENT BLOCK VALVE RELEASE	WA ICR
OLYMPIC PIPELINE 1989 KENT BLOCK VALVE RLEASE	WA ICR
OLYMPIC PIPELINE COMPANY	WA ICR
SOUTH SEATTLE AUTO AUCTION	WA ICR
SOUTHLAND #25303	WA ICR
LAKERIDGE PAVING COMPANY	WA ICR
OLYMPIC PIPELINE COMPANY - KENT BLOCK VALVE	WA ICR
US WEST	WA ICR
ERADCO USED CAR LEASE	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC. (TWO REPORTS)	WA ICR
ARCO #4368/CRAIG INVESTMENTS INC.	WA ICR
NORTHWEST PIPELINE METER STATIONS - S. SEATTLE STN	WA ICR
NORTHWEST PIPELINE METER STATIONS - COVINGTON STN.	WA ICR
RENTON MUNICIPAL AIRPORT	WA ICR
GOODYEAR SERVICE CENTER	WA ICR
CHEVRON #9 7111	WA ICR
PACCAR INC.	WA ICR
PACCAR INC.	WA ICR
PUGET POWER/BOEING/PACIFIC NW GROUP A	WA ICR
BOEING - RENTON BLDG. 4-75	WA ICR
BOEING - RENTON FACILITY - BLDGS 4-78 AND 4-79	WA ICR
BOEING - RENTON FACILITY - BLDG. 4-78	WA ICR
R.P. CHARLEY AUTOMOTIVE	WA ICR
BLACK RIVER CORP. PARK/TRACK A & B	WA ICR

G & M INVESTMENTS/GARDEN PLAZA	WA ICR
PUGET SOUND ENERGY TALBOT HILL SUBSTATION	WA ICR
RENTON SHOPPING CENTER (EIGHT REPORTS)	WA ICR
SOUND FORD RENTON	WA ICR
SOUND SUBARU	WA ICR
METRO EAST DIVISION	WA ICR
PORTER SEALS & BUMSTEAD MANUFACTURING	WA ICR
TANG PROPERTY	WA ICR
BP #11255/TOSCO #1125530134	WA ICR
SOUTHLAND 7-11 #23535	WA ICR
SOUTHLAND #23525	WA ICR
SOUTHLAND #23535	WA ICR
SOUTHLAND #23525	WA ICR
SHELL/TEXACO #120956	WA ICR
UNOCAL #3965	WA ICR
GULL #0263/TACO BELL	WA ICR
CHEVRON #9 2259	WA ICR
UNOCAL #4871 (TWO REPORTS)	WA ICR
DOLLAR CAR SALES	WA ICR
WASHINGTON STATE PATROL	WA ICR
GENERAL TRAILERS CO./TRIAD MACHINERY	WA ICR
SOUTHCENTER CLEANERS	WA ICR
PUGET SOUND ENERGY	WA ICR
SOUTHCENTER MALL (FORMER FREDERICK & NELSON)	WA ICR
SOUTHCENTER DRY CLEANERS	WA ICR
GACO WESTERN	WA ICR
TEXACO #632321471	WA ICR
SOUTHCENTER SOUTH INDUSTRIAL PARK	WA ICR
GENERAL RENT A CAR	CSCSL NFA
SEATAC TACO BELL	VCP, CSCSL NFA

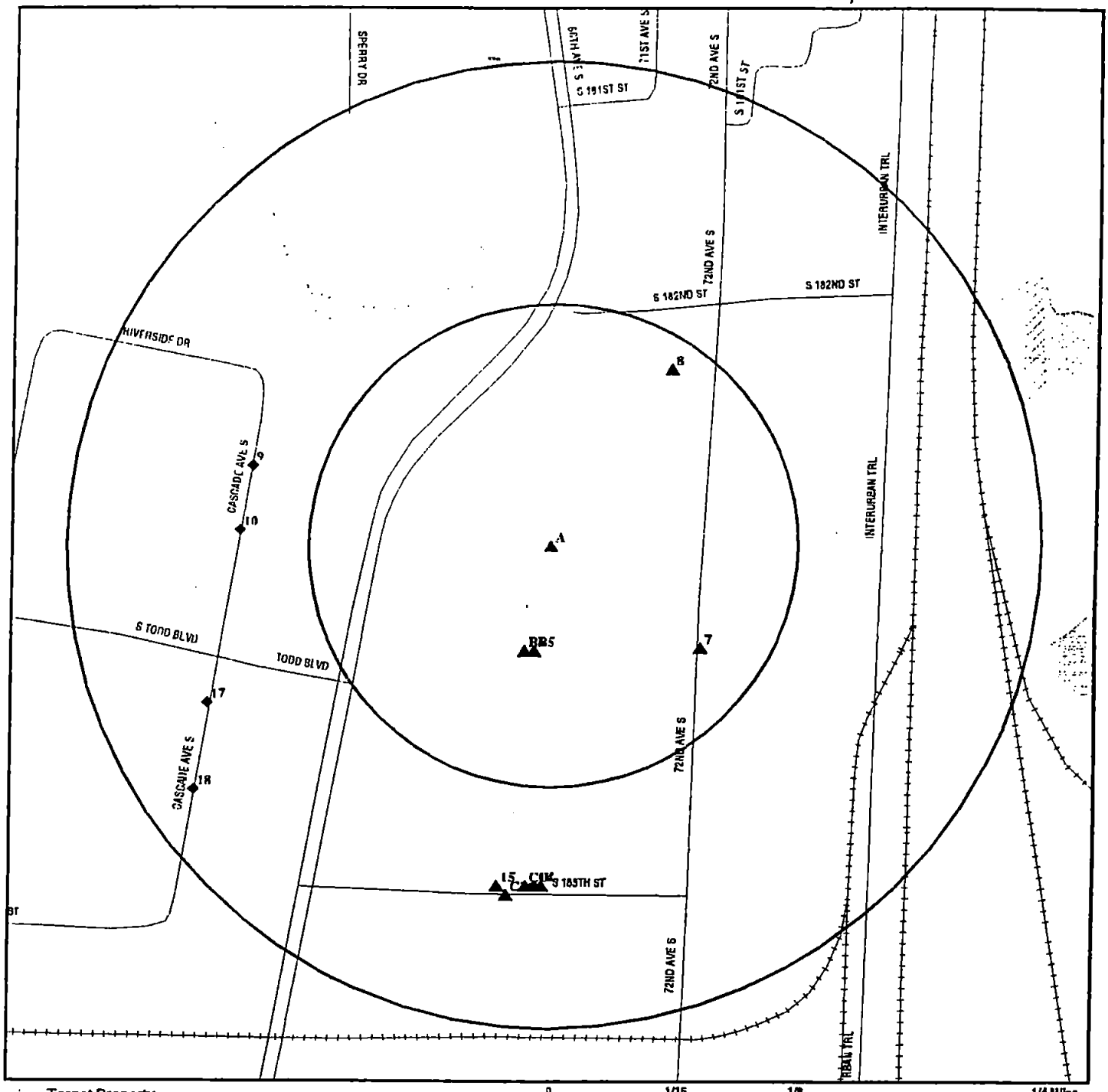
OVERVIEW MAP - 1023101.1s - Environmental Associates, Inc.



- Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- Coal Gasification Sites
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- Federal Wetlands

TARGET PROPERTY:	Industrial Park	CUSTOMER:	Environmental Associates, Inc.
ADDRESS:	18420 68th Avenue South	CONTACT:	Chris Cass
CITY/STATE/ZIP:	Kent WA 98032	INQUIRY #:	1023101.1s
LAT/LONG:	47.4371 / 122.2455	DATE:	August 04, 2003 1:46 pm

DETAIL MAP - 1023101.1s - Environmental Associates, Inc.



- Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- Coal Gasification Sites
- Sensitive Receptors
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- Federal Wetlands

0 1/16 1/8 1/4 Miles

TARGET PROPERTY:	Industrial Park	CUSTOMER:	Environmental Associates, Inc.
ADDRESS:	18420 68th Avenue South	CONTACT:	Chris Cass
CITY/STATE/ZIP:	Kent WA 98032	INQUIRY #:	1023101.1s
LAT/LONG:	47.4371 / 122.2455	DATE:	August 04, 2003 1:47 pm

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
FEDERAL ASTM STANDARD								
NPL		1.000	0	0	0	1	NR	1
Proposed NPL		1.000	0	0	0	0	NR	0
CERCLIS		0.500	0	0	1	NR	NR	1
CERC-NFRAP		0.250	0	0	NR	NR	NR	0
CORRACTS		1.000	0	0	0	1	NR	1
RCRIS-TSD		0.500	0	0	0	NR	NR	0
RCRIS Lg. Quan. Gen.	X	0.250	0	0	NR	NR	NR	0
RCRIS Sm. Quan. Gen.		0.250	2	8	NR	NR	NR	10
ERNS		TP	NR	NR	NR	NR	NR	0
STATE ASTM STANDARD								
CSCSL	X	1.000	1	0	1	10	NR	12
HSL		1.000	0	0	0	0	NR	0
State Landfill		0.500	0	0	0	NR	NR	0
LUST	X	0.500	0	0	1	NR	NR	1
UST	X	0.250	0	2	NR	NR	NR	2
VCP		0.500	1	0	0	NR	NR	1
INDIAN UST		0.250	0	0	NR	NR	NR	0
FEDERAL ASTM SUPPLEMENTAL								
CONSENT		1.000	0	0	0	0	NR	0
ROD		1.000	0	0	0	1	NR	1
Delisted NPL		1.000	0	0	0	0	NR	0
FINDS	X	TP	NR	NR	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
MINES		0.250	0	0	NR	NR	NR	0
NPL Liens		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
DOD		1.000	0	0	0	0	NR	0
RAATS		TP	NR	NR	NR	NR	NR	0
TRIS		TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
SSTS		TP	NR	NR	NR	NR	NR	0
FTTS		TP	NR	NR	NR	NR	NR	0
STATE OR LOCAL ASTM SUPPLEMENTAL								
CSCSL NFA		0.500	0	0	4	NR	NR	4
WA ICR	X	0.500	1	0	3	NR	NR	4
SPILLS		TP	NR	NR	NR	NR	NR	0
WA Emissions		TP	NR	NR	NR	NR	NR	0
EDR PROPRIETARY HISTORICAL DATABASES								
Coal Gas		1.000	0	0	0	0	NR	0

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
BROWNFIELDS DATABASES								
VCP		0.500	1	0	0	NR	NR	1

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

Coal Gas Site Search: No site was found in a search of Real Property Scan's ENVIROHAZ database.

A1 **CAM PROPERTIES** **LUST** **S103925421**
Target **18250 68TH AVE S** **N/A**
Property **KENT, WA 98032**

Site 1 of 4 in cluster A

Actual:
21 ft.

LUST:

Facility ID:	4671	Ecology Region:	NWRO
Release ID:	2382	Release Date:	07/31/91
Release Status:	Cleanup Started	Status Date:	7/31/91
Alternate Name:	CAM PROPERTIES		
Lat/Lon	47.43735 / 122.24695		
Affected Media:	Soil		

Facility ID:	4671	Ecology Region:	NWRO
Release ID:	2382	Release Date:	07/31/91
Release Status:	Reported Cleaned Up	Status Date:	6/1/95
Alternate Name:	CAM PROPERTIES		
Lat/Lon	47.43735 / 122.24695		
Affected Media:	Soil		

A2 **COATINGS UNLIMITED INC KENT** **FINDS** **1000119997**
Target **18420 68TH AVE S STE NO 110** **RCRIS-LQG** **WAD009247107**
Property **KENT, WA 98032**

Site 2 of 4 in cluster A

Actual:
21 ft.

RCRIS:

Owner: COATINGS UNLIMITED INC
(425) 251-3268
EPA ID: WAD009247107

Contact: PAUL ADAMS
(425) 251-3268

Classification: Large Quantity Generator
TSDF Activities: Not reported

BIENNIAL REPORTS:
Last Biennial Reporting Year: 1999

Waste	Quantity (Lbs)	Waste	Quantity (Lbs)
D001	33876.00	D008	4500.00
D018	4500.00	D035	33876.00
F003	33176.00	F005	37676.00

Violation Status: Violations exist

Regulation Violated:	180(1)
Area of Violation:	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	10/02/1997
Actual Date Achieved Compliance:	10/24/1997
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	10/02/1997
Penalty Type:	Not reported
Regulation Violated:	200(1)(e)ref320(1)(2abd)(3)
Area of Violation:	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	10/02/1997
Actual Date Achieved Compliance:	10/03/1997

COATINGS UNLIMITED INC KENT (Continued) 1000119997

Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	10/02/1997
Penalty Type:	Not reported
Regulation Violated:	210(2)(3)
Area of Violation:	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	10/02/1997
Actual Date Achieved Compliance:	10/20/1997
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	10/02/1997
Penalty Type:	Not reported
Regulation Violated:	200(1)(e)ref 350 & 360
Area of Violation:	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	10/02/1997
Actual Date Achieved Compliance:	11/26/1997
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	10/02/1997
Penalty Type:	Not reported
Regulation Violated:	200(1)(e)ref 330
Area of Violation:	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	10/02/1997
Actual Date Achieved Compliance:	10/20/1997
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	10/02/1997
Penalty Type:	Not reported
Regulation Violated:	170(1)(a)
Area of Violation:	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	09/25/1997
Actual Date Achieved Compliance:	10/02/1997
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	10/02/1997
Penalty Type:	Not reported
Regulation Violated:	200(1)(d)
Area of Violation:	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	09/25/1997
Actual Date Achieved Compliance:	10/02/1997
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	10/02/1997
Penalty Type:	Not reported
Regulation Violated:	200(1)(b)ref630(5)(a)
Area of Violation:	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	09/25/1997
Actual Date Achieved Compliance:	10/02/1997
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	10/02/1997
Penalty Type:	Not reported
Regulation Violated:	200(1)(b)ref630(6)
Area of Violation:	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	09/25/1997
Actual Date Achieved Compliance:	10/02/1997
Enforcement Action:	WRITTEN INFORMAL

COATINGS UNLIMITED INC KENT (Continued) **1000119997**

Enforcement Action Date:	10/02/1997
Penalty Type:	Not reported
Regulation Violated:	200(1)(b)ref630(7)
Area of Violation:	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	09/25/1997
Actual Date Achieved Compliance:	10/14/1997
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	10/02/1997
Penalty Type:	Not reported

There are 10 violation record(s) reported at this site:

Evaluation	Area of Violation	Date of Compliance
Compliance Evaluation Inspection	GENERATOR-GENERAL REQUIREMENTS	19971024
	GENERATOR-GENERAL REQUIREMENTS	19971003
	GENERATOR-GENERAL REQUIREMENTS	19971020
	GENERATOR-GENERAL REQUIREMENTS	19971020
	GENERATOR-GENERAL REQUIREMENTS	19971126
Compliance Evaluation Inspection	GENERATOR-GENERAL REQUIREMENTS	19971002
	GENERATOR-GENERAL REQUIREMENTS	19971002
	GENERATOR-GENERAL REQUIREMENTS	19971002
	GENERATOR-GENERAL REQUIREMENTS	19971002
	GENERATOR-GENERAL REQUIREMENTS	19971014

FINDS:
Other Pertinent Environmental Activity Identified at Site:
AIRS Facility System (AIRS/AFS)
Biennial Reporting System (BRS)
Facility Registry System (FRS)
National Compliance Database (NCDB)
National Toxics Inventory (NTI)
Resource Conservation and Recovery Act Information system (RCRAINFO)
Toxic Chemical Release Inventory System (TRIS)

A3 **CAM PROPERTIES** **WA ICR** **U003604557**
Target **18250 68TH AVE S** **UST** **N/A**
Property **KENT, WA 98032**

Site 3 of 4 in cluster A

Actual:
21 ft.

WA ICR:

Date Ecology Received Report:	07/18/1991
Contaminants Found at Site:	Metals
Media Contaminated:	Groundwater
Cause of Contamination:	Not reported
Region:	North Western
Type of Report Ecology Received:	Interim cleanup report
Site Register Issue:	92-10
County Code:	17.00000
Contact:	Not reported
Report Title:	Not reported

CAM PROPERTIES (Continued) **U003604557**

UST:
Facility ID: 4671
Install Date: 12/31/1964 00:00:00
Capacity: Not reported
Status: Removed
Tank Name: 2
Substance: Not reported
Compartment #: 1
Ecology Region: North Western

Facility ID: 4671
Install Date: 12/31/1964 00:00:00
Capacity: Not reported
Status: Removed
Tank Name: 1
Substance: LEADED GASOLINE
Compartment #: 1
Ecology Region: North Western

A4 **SEAPORT FABRICATION KENT** **CSCSL** **U003027086**
Target **18250 68TH AVE S** **N/A**
Property **KENT, WA 98032**

Site 4 of 4 in cluster A

Actual:
21 ft.

SHWS:
Facility ID: 2375
MTBE Code: Not reported
Responsible Unit: Northwest Region
Latitude: 47 26 14
Longitude: 122 14 49
Ecology Site Status relative to the MTCA cleanup process:
Independent Remedial Action
Independent Site Status - those sites undergoing an independent cleanup:
Independent Site Assessment of Interim Remedial Action Report received
WARM Bin Number indicates the outcome of the Washington Ranking Model (WARM):
Affected Media: Soil
Media Status: C (Confirmed) - The presence of hazardous substances above MTCA cleanup levels has been confirmed by laboratory analysis (or field determination in the case of petroleum contamination)
Arsenic Code: Not reported

Base/Neutral/Acid Organics:	Not reported
Halogenated Organic Compounds:	Not reported
Horizontal Collection Method:	GPS (Code/Differential)
EPA Priority Pollutants - Metals and Cyanide:	Confirmed above MTCA cleanup levels
Metals - Other non-priority pollutant medals:	Not reported
Polychlorinated biPhenyls (PCBs):	Not reported
Pesticides:	Not reported
Petroleum Products:	Suspected to be present
Phenolic Compounds:	Not reported
Non-Halogenated Solvents:	Suspected to be present
Dioxin:	Not reported
Polynuclear Aromatic Hydrocarbons (PAH):	Not reported
Reactive Wastes:	Not reported
Corrosive Wastes:	Not reported
Radioactive Wastes:	Not reported.
Asbestos:	Not reported
Conventional Contaminants, Organic:	Not reported

SEAPORT FABRICATION KENT (Continued) **U003027086**

Conventional Contaminants, Inorganic: Not reported

Facility ID: 2375
MTBE Code: Not reported
Responsible Unit: Northwest Region
Latitude: 47 26 14
Longitude: 122 14 49
Ecology Site Status relative to the MTCA cleanup process:
Independent Remedial Action
Independent Site Status - those sites undergoing an independent cleanup:
Independent Site Assessment of Interim Remedial Action Report received
WARM Bin Number indicates the outcome of the Washington Ranking Model (WARM):
Affected Media: Ground Water
Media Status: S (Suspected) - Due to preliminary investigations or the nature of business operations or manufacturing processes, certain contaminants are suspected to be present at the site
Arsenic Code: Not reported

Base/Neutral/Acid Organics:	Not reported
Halogenated Organic Compounds:	Not reported
Horizontal Collection Method:	GPS (Code/Differential)
EPA Priority Pollutants - Metals and Cyanide:	Suspected to be present
Metals - Other non-priority pollutant medals:	Not reported
Polychlorinated biPhenyls (PCBs):	Not reported
Pesticides:	Not reported
Petroleum Products:	Suspected to be present
Phenolic Compounds:	Not reported
Non-Halogenated Solvents:	Suspected to be present
Dioxin:	Not reported
Polynuclear Aromatic Hydrocarbons (PAH):	Not reported
Reactive Wastes:	Not reported
Corrosive Wastes:	Not reported
Radioactive Wastes:	Not reported
Asbestos:	Not reported
Conventional Contaminants, Organic:	Not reported
Conventional Contaminants, Inorganic:	Not reported

NPL
Region South
1/2-1
3807 ft.

WESTERN PROCESSING CO. INC
7215 S 196TH ST
KENT, WA 98032

CERCLIS **1000403310**
RCRIS-SQG **WAD009487513**
FINDS
NPL
ROD

CERCLIS Classification Data:
Site Incident Category: Not reported
Federal Facility: Not a Federal Facility
Non NPL Status: Not reported
Ownership Status: Private
NPL Status: Currently on the Final NPL
Contact: LEE MARSHALL
Contact Tel: (206) 553-2723
Contact Title: Not reported
Site Description: WAS AN INDUSTRIAL WASTE RECYCLING AND RECLAMATION FACILITY. STORAGE AREAS WERE DIRECTLY ON THE GROUND. WASTE MATERIALS HAVE BEEN BURIED ON-SITE. HAZARDOUS MATERIALS ARE KNOWN TO HAVE ENTERED THE ENVIRONMENT FORM LEAKS AND SPILLS.WAS AN INDUSTRIAL WASTE RECYCLING AND RECLAMATION FACILITY. STORAGE AREAS WERE DIRECTLY ON THE GROUND. WASTE MATERIALS HAVE BEEN BURIED ON-SITE. HAZARDOUS MATERIALS ARE KNOWN TO HAVE ENTERED THE ENVIRONMENT FORM LEAKS AND SPILLS.
CERCLIS Assessment History:
Assessment: PRELIMINARY ASSESSMENT
Completed: 06/01/1981
Assessment: DISCOVERY
Completed: 06/01/1981

WESTERN PROCESSING CO. INC (Continued) **1000403310**

NPL Status: Final
Category Description: SURFACE WATER ADJACENT TO SITE-Stream
Category Value: Not reported

NPL SITE STATUS:
NPL Status: Final
Proposed Date: 12/30/1982
Final Date: 09/08/1983
Deleted Date: Not reported

ROD:
Full-text of USEPA Record of Decision(s) is available from EDR.

RCRIS:
Owner: WESTERN PROCESSING CO. INC
(503) 555-1212
EPA ID: WAD009487513

Contact: LUURT NIEUWENHUIS
(206) 872-8075

Classification: Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Biennial Reporting System (BRS)
Comperhensive Environmental Response, Compensation and Liability Information System (CERCLIS)
Facility Registry System (FRS)
ICIS
Resource Conservation and Recovery Act Information system (RCRAINFO)

B5 **WEST VALLEY BUSINESS PARK** **CSCSL** **S104971829**
South **18401 72ND AVE S** **N/A**
< 1/8 **KENT, WA 98032**
292 ft.

Site 1 of 2 in cluster B

Relative: Equal

Actual: 21 ft.

SHWS:
Facility ID: 62654937
MTBE Code: Not reported
Responsible Unit: Northwest Region
Latitude: 47 26 18.63
Longitude: 122 14 47.38
Ecology Site Status relative to the MTCA cleanup process:
Independent Remedial Action
Independent Site Status - those sites undergoing an independent cleanup:
Final Independent Remedial Action Report received
WARM Bin Number indicates the outcome of the Washington Ranking Model (WARM):
Affected Media: Ground Water
Media Status: C (Confirmed) - The presence of hazardous substances above MTCA cleanup levels has been confirmed by laboratory analysis (or field determination in the case of petroleum contamination)
Arsenic Code: Not reported
Base/Neutral/Acid Organics: Not reported
Halogenated Organic Compounds: Not reported
Horizontal Collection Method: 4
EPA Priority Pollutants - Metals and Cyanide: Not reported
Metals - Other non-priority pollutant medals: Not reported

WEST VALLEY BUSINESS PARK (Continued) **S104971829**

Polychlorinated biPhenyls (PCBs):	Not reported
Pesticides:	Not reported
Petroleum Products:	Confirmed above MTCA cleanup levels
Phenolic Compounds:	Not reported
Non-Halogenated Solvents:	Not reported
Dioxin:	Not reported
Polynuclear Aromatic Hydrocarbons (PAH):	Not reported
Reactive Wastes:	Not reported
Corrosive Wastes:	Not reported
Radioactive Wastes:	Not reported
Asbestos:	Not reported
Conventional Contaminants, Organic:	Not reported
Conventional Contaminants, Inorganic:	Not reported

Facility ID: 62654937
MTBE Code: Not reported
Responsible Unit: Northwest Region
Latitude: 47 26 18.63
Longitude: 122 14 47.38
Ecology Site Status relative to the MTCA cleanup process:
Independent Remedial Action
Independent Site Status - those sites undergoing an independent cleanup:
Final Independent Remedial Action Report received
WARM Bin Number indicates the outcome of the Washington Ranking Model (WARM):
Affected Media: Soil
Media Status: R (Remediated) - Contaminants have been treated, removed, or contained to meet cleanup levels established for the site. (This status determination may only be made by Ecology
Arsenic Code: Not reported

Base/Neutral/Acid Organics:	Not reported
Halogenated Organic Compounds:	Not reported
Horizontal Collection Method:	4
EPA Priority Pollutants - Metals and Cyanide:	Not reported
Metals - Other non-priority pollutant medals:	Not reported
Polychlorinated biPhenyls (PCBs):	Not reported
Pesticides:	Not reported
Petroleum Products:	Treated, removed, or contained
Phenolic Compounds:	Not reported
Non-Halogenated Solvents:	Not reported
Dioxin:	Not reported
Polynuclear Aromatic Hydrocarbons (PAH):	Not reported
Reactive Wastes:	Not reported
Corrosive Wastes:	Not reported
Radioactive Wastes:	Not reported
Asbestos:	Not reported
Conventional Contaminants, Organic:	Not reported
Conventional Contaminants, Inorganic:	Not reported

B6 **WEST VALLEY BUSINESS PARK** **WA ICR S104485649**
SSW **18401 72ND AVE. S.** **VCP N/A**
< 1/8 **KENT, WA 98032**
297 ft.

Site 2 of 2 in cluster B

Relative:
Equal

WA ICR:

Date Ecology Received Report:	08/09/1999
Contaminants Found at Site:	Petroleum products
Media Contaminated:	Groundwater, Soil
Cause of Contamination:	Not reported

Actual:
21 ft.

17
WSW
1/8-1/4
1030 ft.

Relative:
Lower

Actual:
20 ft.

ZEP MFG CO TUKWILA
18417 CASCADE AVE S
TUKWILA, WA 98188

RCRIS-SQG **1000123507**
FINDS **WAD099036352**

RCRIS:
Owner: ZEP MFG CO
(360) 555-1212
EPA ID: WAD099036352
Contact: GREG BARTON
(206) 248-1900
Classification: Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Resource Conservation and Recovery Act Information system (RCRAINFO)

18
SW
1/8-1/4
1178 ft.

Relative:
Lower

Actual:
20 ft.

UNOCAL CORPORATION
18449 CASCADE AVE S
TUKWILA, WA 98188

UST **U001123254**
N/A

UST:
Facility ID: 3617
Install Date: 12/31/1964 00:00:00
Capacity: Not reported
Status: Removed
Tank Name: 0794-0200-4
Substance: USED OIL/WASTE OIL
Compartment #: 1
Ecology Region: North Western

D19
West
1/4-1/2
1533 ft.

Relative:
Lower

Actual:
20 ft.

G RADEN & SONS INC
18289 OLYMPIC AVE S
TUKWILA, WA 98188

CSCSL NFA **S104971632**
N/A

Site 1 of 2 in cluster D

WA NFA:
Facility/Site Id : 3177344
Ecology Status : Independent Remedial Action
Independent Status Code : Final Independant RA Report received
WARM Bin Number : Not reported
NFA Code : NFA after Assesment IRAP or VCP
NFA Date : 8/12/97 0:00
Program Plan Code : 3

22
NNW
1/4-1/2
1796 ft.

HOWARD COOPER CORP
17700 WEST VALLEY HWY PO BOX 9800
TUKWILA, WA 98188

LUST
UST

U001124389
N/A

Relative:
Lower

Actual:
17 ft.

LUST:

Facility ID:	6179	Ecology Region:	NWRO
Release ID:	1698	Release Date:	01/22/90
Release Status:	Cleanup Started	Status Date:	1/22/90
Alternate Name:	HOWARD COOPER MACHINERY		
Lat/Lon	47.443332 / 122.219802		
Affected Media:	Soil		

Facility ID:	6179	Ecology Region:	NWRO
Release ID:	1698	Release Date:	01/22/90
Release Status:	Reported Cleaned Up	Status Date:	6/1/95
Alternate Name:	HOWARD COOPER MACHINERY		
Lat/Lon	47.443332 / 122.219802		
Affected Media:	Soil		

UST:

Facility ID:	6179
Install Date:	12/31/1964 00:00:00
Capacity:	Not reported
Status:	Removed
Tank Name:	3 10
Substance:	Not reported
Compartment #:	1
Ecology Region:	North Western

Facility ID:	6179
Install Date:	12/31/1964 00:00:00
Capacity:	Not reported
Status:	Removed
Tank Name:	4 ATC
Substance:	Not reported
Compartment #:	1
Ecology Region:	North Western

Facility ID:	6179
Install Date:	12/31/1964 00:00:00
Capacity:	Not reported
Status:	Removed
Tank Name:	7 DIESEL
Substance:	Not reported
Compartment #:	1
Ecology Region:	North Western

Facility ID:	6179
Install Date:	12/31/1964 00:00:00
Capacity:	Not reported
Status:	Removed
Tank Name:	5 WASTE
Substance:	USED OIL/WASTE OIL
Compartment #:	1
Ecology Region:	North Western

HOWARD COOPER CORP (Continued) **U001124389**

Facility ID: 6179
Install Date: 12/31/1964 00:00:00
Capacity: Not reported
Status: Removed
Tank Name: 2 30
Substance: Not reported
Compartment #: 1
Ecology Region: North Western

Facility ID: 6179
Install Date: 12/31/1964 00:00:00
Capacity: Not reported
Status: Removed
Tank Name: 1 90
Substance: Not reported
Compartment #: 1
Ecology Region: North Western

Facility ID: 6179
Install Date: 12/31/1964 00:00:00
Capacity: Not reported
Status: Removed
Tank Name: 6 FUEL
Substance: UNLEADED GASOLINE
Compartment #: 1
Ecology Region: North Western

---

23 **STERNOFF METALS CORPORATION** **CSCSL S102258342**
NNE **1600 SW 43RD ST** **N/A**
1/4-1/2 **RENTON, WA 98055**
1897 ft.

Relative: **Higher**

Actual: **29 ft.**

SHWS:
Facility ID: 2196
MTBE Code: Not reported
Responsible Unit: Northwest Region
Latitude: 47 26 29.9
Longitude: 122 14 17.62
Ecology Site Status relative to the MTCA cleanup process:
Remedial Action in progress
Independent Site Status - those sites undergoing an independent cleanup:
Not reported
WARM Bin Number indicates the outcome of the Washington Ranking Model (WARM):
Affected Media: Sediments
Media Status: C (Confirmed) - The presence of hazardous substances above MTCA cleanup levels has been confirmed by laboratory analysis (or field determination in the case of petroleum contamination)
Arsenic Code: Not reported
Base/Neutral/Acid Organics: Not reported
Halogenated Organic Compounds: Not reported
Horizontal Collection Method: 4
EPA Priority Pollutants - Metals and Cyanide: Confirmed above MTCA cleanup levels
Metals - Other non-priority pollutant medals: Not reported
Polychlorinated biPhenyls (PCBs): Confirmed above MTCA cleanup levels
Pesticides: Not reported
Petroleum Products: Confirmed above MTCA cleanup levels
Phenolic Compounds: Not reported
Non-Halogenated Solvents: Not reported

APPENDIX B

Copies of Selected Pages of HLA's January 1991-dated "Phase II Investigation Report"

January 14, 1991

20184,002.09

Mrs. Cathy Waldron
CAM Properties
18250 - 68 Avenue South
Kent, Washington 98032

Dear Mrs. Waldron:

Phase II Investigation Report
CAM Properties
18250 - 68 Avenue South
Kent, Washington

INTRODUCTION

This letter presents the findings of a Phase II investigation performed by Harding Lawson Associates (HLA) for CAM Properties at 18250 - 68 Avenue South in Kent, Washington. This investigation was performed in accordance with HLA's recommendations in our letter dated October 25, 1990. HLA previously completed a preliminary hazardous materials site assessment of the subject property, and the results are presented in our report dated November 1, 1990.

The objective of the Phase II investigation was to further evaluate the potential impact of two previous fuel underground storage tanks (USTs) removed in 1987, and the stained soil near the blast room and wet scrubber associated with the existing manufacturing facility on the property. The Phase II investigation was authorized by Mrs. Cathy Waldon of CAM Properties on November 9, 1990. HLA's scope of services included the following tasks:

- Drill and sample two borings at the previous location of the diesel and gasoline underground storage tanks. Collect one soil sample from each boring, and analyze for total petroleum hydrocarbons (TPH), and benzene, toluene, ethylbenzene, and xylene (BTEX).

- Collect soil samples at the surface and at depths up to 1 foot deep at three locations within the stained-soil area adjacent to the wet scrubber and blast room. Analyze soil samples for heavy metals and volatile organic compounds.

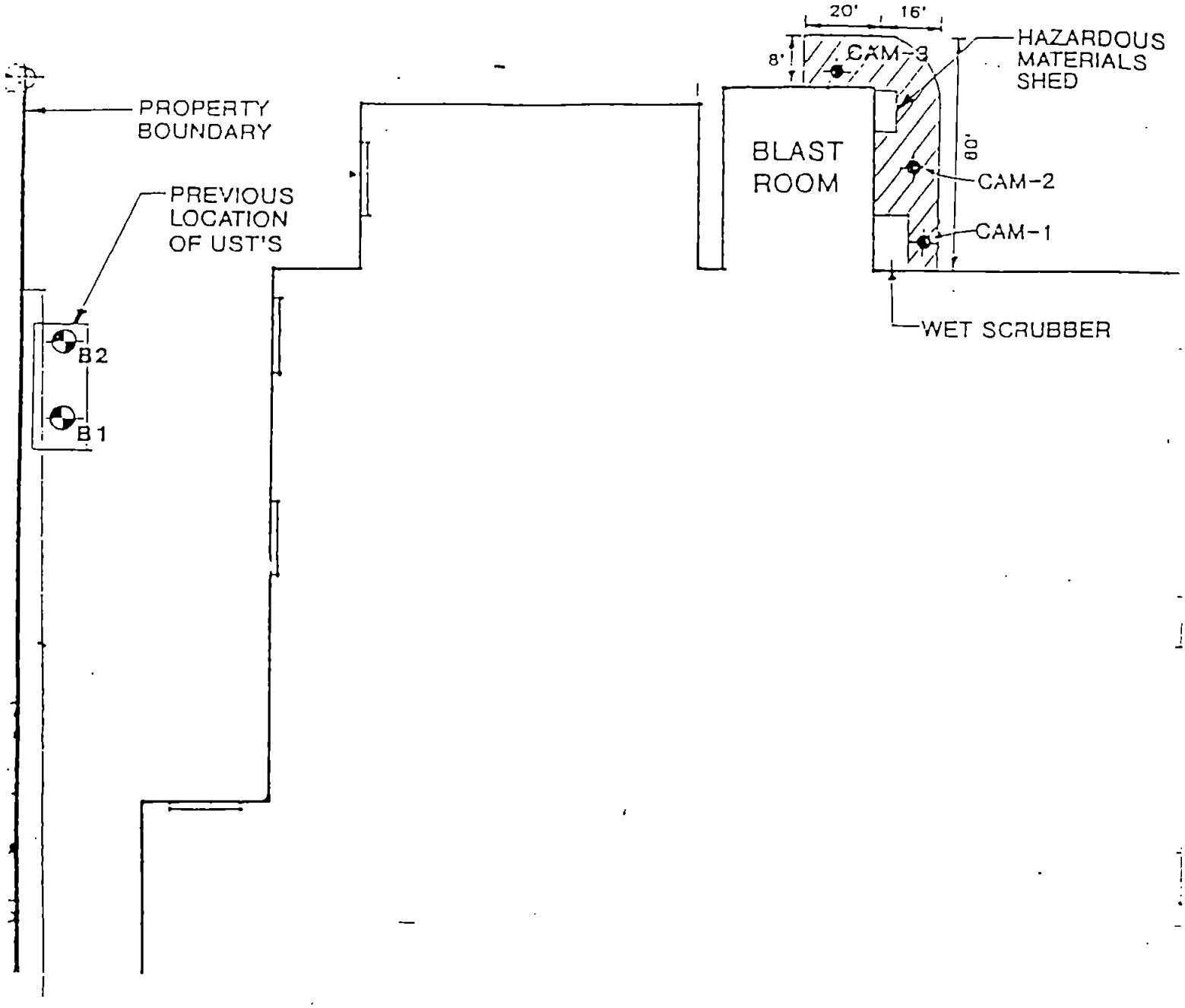
- Evaluate the data and prepare this report.

TABLE 1 - SUMMARY OF ANALYTICAL RESULTS

ANALYTE	UNITS	CAM-1S (0-3')	CAM-1D (6-9')	CAM-2S (0-3')	CAM-2D (6-9')	CAM-3S (0-3')	CAM-3D (6-9')	D1 (10-11.5')	D2 (10-11.5')	Proposed MTCA Clean up Level for Industrial Sites
Methylene Chloride	ppb	3J	ND	4J	1J	ND	ND	NA	NA	500
Acetone	ppb	68J	43B	53B	ND	83B	11B	NA	NA	--
Chloroform	ppb	ND	ND	ND	5J	ND	ND	NA	NA	--
2-Butanone	ppb	ND	ND	ND	ND	ND	2J	NA	NA	--
Benzene	ppb	3J	ND	1J	ND	2J	ND	ND	ND	500
Ethylbenzene	ppb	ND	ND	ND	ND	1J	ND	ND	ND	20,000
Toluene	ppb	18	3J	6	3J	3J	4J	5J	ND	40,000
Xylenes (total)	ppb	11	4J	5J	3J	6	5J	7	ND	20,000
Barium	ppm	4720	45.1	1,650	245	370	259	NA	NA	--
Cadmium	ppm	ND	ND	ND	ND	ND	ND	NA	NA	10
Chromium	ppm	1,640	61.6	1,280	223	1,170	39.3	NA	NA	500
Copper	ppm	1,000	122	615	213	716	667	NA	NA	--
Lead	ppm	4,160	73.7	3,210	680	1,000	686	NA	NA	1,000
Nickel	ppm	567	48.3	482	116	935	32.7	NA	NA	--
Zinc	ppm	19,700	241	14,700	1,550	446	2,260	NA	NA	--
TPH	ppm	NA	NA	NA	NA	NA	NA	ND	580	200

Notes:

ppb - parts per billion (ug/kg)
ppm - parts per million (mg/kg)
B - Indicates compound was found in the associated laboratory blank as well as the sample.
J - Indicates estimated value. Presence of compound meets laboratory identification criteria but is less than the sample quantitation limit but greater than zero.
NA - Compound not analyzed.
ND - Not detected.
-- - Proposed MTCA clean up level not available.



LEGEND

B1 BORING LOCATION

HAND SAMPLING LOCATION

AREA OF HEAVILY STAINED SOIL

N

0 20 40 FEE

Approximate Scale

Harding Lawson Associates
Engineering and Environmental Services

Figure 1

BORING LOCATION PLAN

18250 68TH AVENUE SOUTH
KENT, WASHINGTON

Harding Lawson Associates
1325 Fourth Avenue Suite 1800
Seattle WA 98101
(206) 622 0812
(206) 292 8810 Telecopy

CHAIN OF CUSTODY FORM

Lab: [illegible]

Samplers: SCOTT YANCEY

Job Number: 20184,007.09

Name/Location: CAM PROPERTIES/KENT WA

Project Manager: DAN BALBIANI

ANEL 2554

Recorder: [signature] (Signature Required)

Code	Matrix: Water	Matrix: Sediment	Matrix: Soil	Matrix: Oil	#Containers & Preserv.: Unpres	H_2SO_4	HNO_3	Sample Number or Lab Number (Yr / Wk / Seq)	Date: Yr	Mo	Dy	Time	Station Description/Notes	EPA 601/8010	EPA 602/8020	EPA 624/8240	EPA 625/8270	ICP METALS	EPA 8015M/TPH
[illegible]			X		X			C-1B	91	02	22	0900						X	
[illegible]			X		X			C-2B	91	02	22	0900						X	
[illegible]			X		X			C-2X	91	02	22	0900						X	
[illegible]			X		X			C-4X	91	02	22	0900						X	
[illegible]			X		X			C-5B	91	02	22	0930							X
[illegible]			X		X			C-6B	91	02	22	0930							X
[illegible]			X		X			C-7X	91	02	22	0930							X
[illegible]			X		X			C-8X	91	02	22	0930							X
								TRIP BLANK C-10-2-22-TB											

Lab Number: Yr	Wk	Seq	Depth in Feet	Col Mtd CD	QA Code	Miscellaneous

CHAIN OF CUSTODY RECORD

RELINQUISHED BY: (Signature) [signature]	RECEIVED BY: (Signature) [signature] /ANEL	DATE/TIME 2-22 [illegible]
RELINQUISHED BY: (Signature)	RECEIVED BY: (Signature)	DATE/TIME
RELINQUISHED BY: (Signature)	RECEIVED BY: (Signature)	DATE/TIME
RELINQUISHED BY: (Signature)	RECEIVED BY: (Signature)	DATE/TIME
DISPATCHED BY: (Signature) [signature] 2/22 — DATE/TIME	RECEIVED FOR LAB BY: (Signature) [signature] ANEL	DATE/TIME 2-22 [illegible]

METHOD OF SHIPMENT

Please print or type (Form designed for use on elite (12 pitch) typewriter.) D1617749 REC'D JUL 24 2003 Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD092471077	Manifest Document No. 01774	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Coatings Unlimited
18420 - 68Th Ave
Kent WA 98032 Paul Adams

4. Generator's Phone ([illegible]) [illegible]

A. State Manifest Document Number

B. State Generator's ID 18420 - 68Th Ave Kent, WA 98032

5. Transporter 1 Company Name: Clean Harbors Env. Services Inc
6. US EPA ID Number: MAD039322250

C. State Transporter's ID

D. Transporter's Phone (781) 849-1800

7. Transporter 2 Company Name: SLT Express
8. US EPA ID Number: UTD981552425

E. State Transporter's ID

F. Transporter's Phone 800-621-3047

9. Designated Facility Name and Site Address
Clean Harbors Aragonite LLC
11600 North Aptus Road
Aragonite, UT 84029

10. US EPA ID Number: UTD981552177

G. State Facility's ID 9400019999

H. Facility's Phone (801) 323-8100

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE PAINT RELATED MATERIAL, 3, UN1263, PG II	X	009	DM	03825	P	D001 D035 F003 F005
b. HAZARDOUS WASTE SOLID N.O.S., 9, NA3077, PG III	X	001	DM	00040	P	D001 D035 F003 F005
c.						
d.						

J. Additional Descriptions for Materials Listed Above
11a ERG#127 (L)(I,E) 9 X 55g DM
11b ERG#171 (S)(I,E) 1 X 55g DM

CR	
FS	X

K. Handling Codes for Wastes Listed Above
T07

15. Special Handling Instructions and Additional Information
11a: WACOT-2422359 11b: WACOT-2422348
24 HOUR EMERGENCY # (800) 645 - 8265
DI617749

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month Day Year
Glenn Wagener	[signature]	07 03 03

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
Scott Tyson	[signature]	07 03 03

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
C B Farraday	[signature]	07 11 03

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year
Glenna Lawrence	[signature]	07 17 03

Style CF 17 LABELMASTER (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.

ORIGINAL-RETURN TO GENERATOR

PRINTED ON RECYCLED PAPER — PRINTED WITH SOY INK

Puget Sound Clean Air Agency

2003 Annual Registration Certificate

Working Together for Clean Air.

Upon full payment of the 2003 annual registration fees, this facility is registered to operate as an air contaminant source during calendar year 2003

Registration Number	Effective Date	Expiration Date
10374	01-01-2003	12-31-2003

Coatings Unlimited Inc
18420 68th Ave S, Ste 110
Kent, WA 98032

Site Address:
18420 68th Ave S, Ste 110
Kent, WA 98032

Executive Director

APPENDIX F

Copies of Selected Pages from Six (6) Reports By Others & WDOE Correspondence for the Adjacent West Valley Business Park Site

Glen R. Scott
EQUITABLE LIFE ASSURANCE SOCIETY OF THE UNITED STATES
Two Union Square
601 Union Street, Suite 2812
Seattle, Washington 98101

January 6, 1997

RE: LIMITED SUBSURFACE INVESTIGATION
WEST VALLEY BUSINESS PARK
18401 & 18601 72ND AVENUE SOUTH
KENT, WASHINGTON
PROJECT NO. 87076.0805

Dear Mr. Scott:

At the request of Equitable Real Estate Investment Management Inc. (Equitable), ATC Associates Inc. (ATC), performed a Limited Subsurface Investigation at West Valley Business Park located at 18401 & 18601 72nd Avenue South, Kent, Washington (project area). The purpose of this investigation was to determine if there was any environmental impact from the neighboring property to the north. Specifically, there were concerns regarding the presence of a concrete-lined sump on this neighboring property with a discharge pipe terminating at the project area. Additionally, there was a hose emanating from a building on the neighboring property which also had a discharge point located on the project area.

BACKGROUND

At the request of Richard Kolpa, Property Manager, R. J. Hallissey Co., Inc., ATC evaluated concerns regarding the neighboring property to the north of the project area This neighboring property is believed to conduct painting and coating as indicated by site reconnaissance. The area between the project area and neighboring property is a strip of land that appears to serve in part as a drainage swale for stormwater runoff. Most of this strip of land is indicated to be part of the subject site which extends fifteen feet northward from the building to the property line. This strip of land runs along the backside of one of the subject site buildings. This area is not readily observable from the majority of the subject property or surrounding streets.

On the adjoining property, ATC observed drum storage areas near the property line. One of these drum storage areas was floored and curbed with concrete and was covered. One of the drums was observed to be labeled as methyl ethyl ketone which is a regulated hazardous substance.

ATC observed an open concrete-lined sump on the neighboring property near the property line. The sump contains murky water with a light sheen. A sump pump discharges into a four inch PVC discharge line that runs from the sump to a discharge point onto the strip of land between the respective properties. The discharge line traverses along the strip of land for a distance of approximately 50 feet. The discharge line appears to be used frequently based on the appearance of the soil located at the discharge point. No active discharging was observed during the site visit. The purpose of the sump and the nature of the discharge is unknown.

ATC also observed a 2 inch diameter high-pressure hose which exits one of the buildings on the neighboring property. The hose traverses along the strip of land and discharges to a point on the strip of

[illegible] Seaview Ave. N.W. • Seattle WA [illegible] • (206) [illegible] • FAX (206) [illegible]

EXHIBIT B

NATIONAL EXPRESS LABORATORIES, INC.

NATEX

Pacific Northwest Environmental Laboratory, Inc.

CHAIN-OF-CUSTODY / REQUEST FOR ANALYSIS

Laboratory Contact: Susan ~~Walker or Dan Balbiani~~ Winter scw

Send Lab Report To: Dan Balbiani

Client Name: Harding Lawson Assoc. (HLA)

Client Number:

Bill To: HLA
1325 4th Avenue, Suite 1800
Seattle, WA. 98101

Date Report Required: 2 week TAT (15 calender days)

Client Contact: Susan Walker or Dan Balbiani

Client Contact Phone: 206-622-0812

PO No.

Carrier No. PNEL # 2773

Sample Number	Sample Location and Description	Date Collected	Time Collected	Sample Matrix	Number of Containers	VOA's 8240	Heavy Metals Ba Cd Cr Cu Pb Ni Zn	TEPH 8015	BETX 8020			Comments
CAM 1S	surface, near scrubber	11/15/90	0930	soil	2	X	X					
CAM 2S	surface, edge scrubber	11/15/90	0940	" "	2	X	X					
CAM 3S	surface, near blast room		0950		2	X	X					
CAM 1D	6 in. deep, nr scrubber	" "	1030		2	X	X					
CAM 2D	6 in. deep, edge scrubber		1045		2	X	X					
CAM 3D	6 in. deep nr blast room		1100		2	X	X					
B1	WEST END EXCAVATION		1000		2			X	X			
B2	EASTEND EXCAVATION	11/15/90	1100	soil	2							
[illegible] B	[illegible] LRC			[illegible]	2							

Possible Hazards: petroleum, VOAs, heavy metals

Special Instructions: Two week TAT

What Analysis?

Was Preservative Used? No [X] Yes [ ] What Kind?

	Relinquished By	Date	Time	Received By	Date	Time
1	Susan C. Walker	11/15/90	1400			
2	Michell Baker	11/15/90	16 50	Regina Cook / PNEL	11/15/90	16:50

APPENDIX C

Copies of Selected Pages of HLA's July 1992-dated "Independent Cleanup Action Report"

Harding Lawson Associates

July 18, 1991

20184.003.09

Mrs. Cathy Waldron
CAM Properties
18250 68th Avenue South
Kent, Washington 98032

Dear Mrs. Waldron:

Independent Cleanup Action Report
CAM Properties
18250 - 68 Avenue South
Kent, Washington

INTRODUCTION

This letter report presents the results of an independent cleanup action performed by Northwest Enviroservice, Inc. (NEI), and monitored by Harding Lawson Associates (HLA) for CAM Properties at 18250 - 68 Avenue South, Kent, Washington. This cleanup action was performed in accordance with the general guidelines presented in CAM Properties' letter to the Washington State Department of Ecology (WDOE) dated March 4, 1991. HLA had previously completed a Phase I Preliminary Hazardous Materials Site Assessment (PSA) and a Phase II Site Investigation for the subject property. The results of these two investigations are presented in reports dated November 1, 1990, and January 14, 1991, respectively. A copy of the Phase II Site Investigation report is attached as Appendix A.

FIELD INVESTIGATIONS

The property consists of a metal fabrication and manufacturing facility currently operated by CAB Systems, Inc. in Kent, Washington (Figure 1). The property is owned by CAM Properties. The discovery that a historic release had occurred at the facility was identified as a result of a Phase II Investigation conducted by HLA. The Phase II Investigation was performed to further evaluate the findings of a Phase I PSA, also conducted by HLA, which indicated there was a potential that surface soils may have been impacted from operation of an exhaust air wet scrubber. The PSA also indicated there was a potential that subsurface soil may have been impacted by the use of two underground storage tanks (USTs) used to store gasoline and diesel.

[illegible] 206/292-8812

The storage tanks were removed in 1987, and a soil sample obtained at the time of removal was tested for total oil and grease. The results of this analysis were below the detection limit.

The results of the Phase II Investigation report (Appendix A) indicated that surface soils in the vicinity of the wet scrubber contained concentrations of chromium and lead in excess of the cleanup levels for soil for industrial sites provided in the Model Toxics Control Act Cleanup Regulation (WAC 173-340). Also, one of the soil samples obtained in the vicinity of the previous location of the USTs contained total petroleum hydrocarbons (TPH) slightly above the limits specified in the regulation.

As a result of these findings, CAM Properties elected to proceed with an independent cleanup action at the site to remove the contaminated soils from these two areas, as outlined in their letter to WDOE dated March 4, 1991. Soil excavation, disposal, and confirmation sampling have now been completed at the site. The results of these activities are presented in the following section.

SOIL REMOVAL

CAM Properties contracted with Northwest Enviroservice, Inc. (NEI) in February 1991 to excavate soils from the two different areas, test the excavated soils, and then properly dispose of any contaminated soil. HLA was retained by CAM Properties to oversee the soil excavation activity, and perform confirmation sampling of the remaining soil following excavation.

Former UST Location

The first area to be excavated was in the vicinity of the former underground storage tanks (see Figure 2). The area planned for excavation was approximately 13 feet by 15 feet. Soil excavation was to proceed down until the top of the water table was reached (estimated to be 10 to 12 feet below ground surface).

NEI conducted the soil excavation on February 21, 1991. Excavated soils were placed on clean plastic sheeting in two stockpiles next to the excavation. At a depth of approximately 2.5 feet, debris from a concrete pad was encountered. More concrete was unearthed at a depth of 4 feet. At this point, HLA's field engineer advised NEI to prepare the second stockpile area for the remainder of the soil to be excavated. Soil excavation then continued to a depth of 11 feet, at which time groundwater was encountered, and the excavation was terminated. Approximately 17 cubic yards (CY) of soil was stockpiled in the first pile, and 37 CY in the second. Both stockpiles were covered with plastic sheeting.

Soil samples were collected from both stockpiles, and from the base of the excavation on February 22, 1991. Sampling locations and descriptions are summarized in Table 1, and shown in Figure 3. Analytical results are summarized in Table 2. Analytical laboratory data sheets, and chain-of-custody forms are included in Appendix B.

Samples 5B, 6B, 7X, and 8X were collected from soils at this location, and tested by Pacific Northwest Environmental Laboratory, Inc. (PNELI) for TPH using EPA Method 8015 (modified). Neither of the two soil samples collected from the base of the excavation from the former UST location contained levels of TPH above the MTCA cleanup levels of 200 mg/kg for diesel or other hydrocarbons. Sample 8X from the second soil stockpile also had TPH levels well below the 200 mg/kg cleanup level. However, sample 7X from the first soil stockpile contained 270 mg/kg of TPH, quantified as motor oil. Since this exceeds the MTCA cleanup level of 200 mg/kg, the soil in this stockpile was judged to be contaminated with petroleum hydrocarbons. CAM Properties retained NEI to transport and dispose of this soil (17 CY) at a permitted landfill at a future date.

Soil from stockpile #2 (approximately 37 CY), which was determined not to contain concentrations of TPH in excess of 200 mg/kg, was used to partially backfill the excavation. Imported fill material will be brought in at a later date by CAM Properties to complete the backfilling of this excavation.

Wet Scrubber Area

The previous site investigation work had indicated that there was a good correlation between discolored soils and the presence of elevated levels of metals in the soil. Therefore, the excavation plan for the second area (wet scrubber) called for initial excavation of stained soil to a depth of 6 inches in the area shown in Figure 2. At that point, further excavation would be undertaken in any areas where visible staining of the soil was still present. Excavation would continue until all stained soils had been removed.

The excavation work in this area was also carried out by NEI on February 21, 1991. The hazardous materials storage shed, located adjacent to the blast room, had been moved earlier by CAB Systems to allow soil excavation to proceed in this area. Six to 12 inches of soil was removed from the area shown on Figure 3. Grit-like materials of varying colors (e.g. red, black) were encountered in the soil during this excavation. Approximately 28 CY of soil was excavated from this area, and stockpiled nearby on plastic sheeting. The stockpile was also covered with plastic sheeting.

Samples 1B, 2B, 3X and 4X were collected from soils associated with the wet scrubber area and tested for various metals by PNELI. Three of the four soil samples collected from the wet scrubber area were found to contain levels of chromium and lead above the MTCA cleanup levels for industrial soil (1,000 mg/kg for lead and 500 mg/kg for chromium) as shown in Table

2. Only sample 2B, from the base of the excavation, near the scrubber pad, did not contain concentrations of metals exceeding the MTCA cleanup levels. As a result, it was determined that further excavation of soils in the vicinity of sample 1B was required.

On March 5, 1991, HLA's field engineer returned to the site to collect a sample (9B) of the black grit material encountered in a thin (<1 inch thick) layer of the soil at a depth of 6 to 12 inches below ground surface. The purpose of this analysis was to determine whether this black grit material was also a source of metals contamination in this area (i.e., in addition to the red-stained soil that had been excavated). This sample was found to contain lead and cadmium concentrations above the MTCA cleanup levels. Therefore, it was decided that further soil excavation efforts would be required in this area in order to achieve removal of this black grit.

NEI was again mobilized to the site on June 5, 1991 to undertake the excavation of the black grit layer in the soil. A backhoe was used to excavate this material from the approximate area shown in Figure 3, at depths up to about one foot. The excavation started from the approximate location of soil sample 9B and proceeded in all directions until no further signs of the black grit were observed or until obstructions were encountered. In general, soil excavation was able to proceed without interruption to the north, east and south, allowing for complete removal of this material. However, soil excavation to the west was terminated due to obstruction by the blast room building foundation and the concrete apron. Soil excavation was conducted right up the the building foundation and to the edge of the concrete pad. The HLA field engineer observed that a thin layer (<1-inch thick) of black grit was still present in the soil at a depth of 12-15 inches below ground surface at some locations along the concrete apron and building foundation. This material appeared to extend below the building foundation and the concrete apron, but further excavation was not possible below these structures. At this point, excavation work was terminated and two soil samples were collected for analysis of barium, cadmium, chromium, copper, lead, nickel and zinc. Sample 10B was taken from the base of the newly excavated area (near where sample 9B had been collected) and sample 11S was taken from the sidewall of the excavation at the edge of the concrete apron. Sample 11S contained the black grit material that appeared to extend under the concrete apron and the blast room foundation.

The laboratory results for sample 10B showed that the concentrations for all metals of concern were well below the MTCA Method A Cleanup Levels, as expected. The results for sample 11S indicated that cadmium and lead concentrations exceeded the Method A Cleanup Levels for industrial soil. These results were consistent with previous analyses of soil samples from other areas that contained the black grit material.

The soil excavated on June 5 was added to the existing stockpile created on February 21 adjacent to the main building. All soil from this stockpile (approximately 38 CY) was loaded onto two tandem trailers by NEI, weighed at an offsite scale, manifested and transported to the Chemical Waste Management secure landfill in Arlington, Oregon for disposal as hazardous waste. The total weight of the soil in the two tandem trailers was 97,040 pounds (48.5 tons).

SUMMARY AND CONCLUSIONS

Based on observations by HLA's field engineer, it appears that a thin layer (<1 inch thick) of black grit extends some distance beneath some of the blast room building foundation and the concrete apron. This material was observed to be present at a depth of approximately 1-1.5 feet below ground surface at these locations. It is not known how far this layer of black grit extends horizontally below the building or concrete apron. A shallow test excavation dug to a depth of two feet on the north side of the concrete apron did not encounter any black grit or stained soil, which infers that the black grit layer terminates at some point under the apron.

Concentrations of cadmium, lead and occasionally chromium in excess of the MTCA Method A Cleanup Levels for industrial soil are present in this thin layer of black grit. However, it is physically impossible to remove this material from the subsurface without demolition of the blast room and the adjoining concrete apron. Therefore, this material should be allowed to remain in place at the present time under the following assumptions and conditions:

- the CAB Systems site in Kent meets the definition of an industrial site under MTCA (WAC 173-340-745)
- institutional controls will be implemented in accordance with WAC 173-340-440
- removal of the black grit material from these areas is not technically feasible without demolition of the structures
- the extent of the metals contamination appears to be limited to a very thin layer of material (<1-inch thick)
- laboratory testing of the soil sample collected from below the black grit layer (10B) indicates that the surrounding soils have not been significantly impacted by this material (i.e., leaching of metals from this material does not appear to be a problem)
- the material under the building and concrete apron is isolated from direct contract with surface water infiltration and groundwater
- the grit material should be excavated and properly disposed or treated if the blast room and concrete apron are eventually demolished (either by CAB Systems, CAM Properties or by subsequent property owners)
- institutional controls will include a restrictive covenant on the property recorded with the county register of deeds

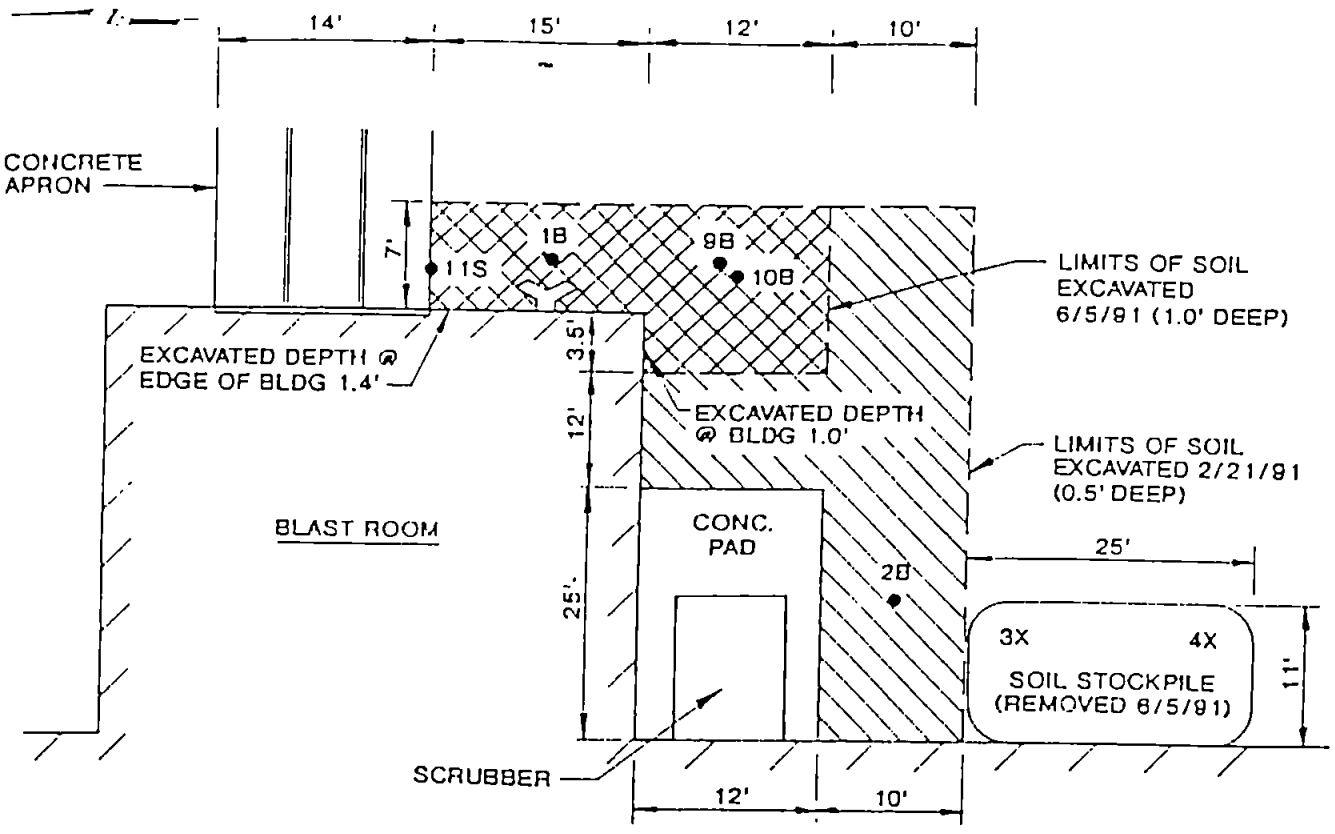
TABLE 1
SAMPLING LOCATIONS AND DESCRIPTIONS

Sample no.	Date	Location	Description
1B	02/22/91	Near grit blow-out, beneath excavated soil.	Tan, compacted silty sand with gravel.
2B	02/22/91	Near scrubber pad, beneath excavated soil.	Tan, compacted silty sand with gravel.
3X	02/22/91	From excavated soil stockpile at scrubber.	Loose, brown-tan silty sand with orange-red staining.
4X	02/22/91	From excavated soil stockpile at scrubber.	Loose, brown-tan silty sand with orange-red staining.
5B	02/22/91	From bottom of excavation at former UST location.	Wet, brown-gray, silty clay.
6B	02/22/91	From bottom of excavation at former UST location.	Wet, brown-gray, silty clay.
7X	02/22/91	From excavated soil stockpile no. 1 at former UST location.	Loose, brown soil with gravel.
8X	02/22/91	From excavated soil stockpile no. 2 at former UST location.	Wet, brown-gray soil.
9B	03/05/91	Near former hazmat building, beneath excavated soil.	Fine black grit.
10B	06/05/91	Near former hazmat building, beneath excavated soil.	Tan, compacted silty sand with gravel.
11S	06/05/91	Near concrete pad.	Fine black grit.

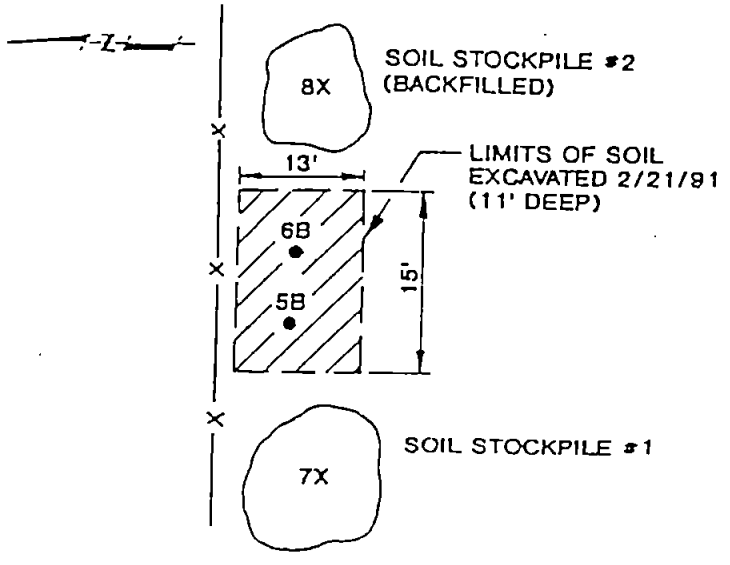
TABLE 2
ANALYTICAL RESULTS FOR SOIL SAMPLES

Analyte	Sample No. 1B	2B	3X	4X	5B	6B	7X	8X	9B	10B	11S
Barium	480	209	310	756	NT	NT	NT	NT	840	66.2	497
Cadmium	4.8	3.6	4.6	2.7	NT	NT	NT	NT	27.3	<1.1	10.8
Chromium	1090	35.5	810	858	NT	NT	NT	NT	67.4	19.9	65.8
Copper	313	528	1690	279	NT	NT	NT	NT	2440	21.6	1550
Lead	2690	409	2130	2380	NT	NT	NT	NT	2820	7.2	1790
Nickel	199	31.6	254	185	NT	NT	NT	NT	59.5	23.5	48.9
Zinc	4280	1270	8930	3330	NT	NT	NT	NT	8590	37.7	5450
TPH (diesel)	NT	NT	NT	NT	< 27	< 23	< 19	< 24	NT	NT	NT
TPH (motor oil)	NT	NT	NT	NT	62	58	270	24	NT	NT	NT

NT = Not Tested
All concentrations shown are in mg/kg



SCRUBBER AREA



FORMER UST LOCATION

LEGEND

● SAMPLING LOCATION

2B SOIL SAMPLE ID No.

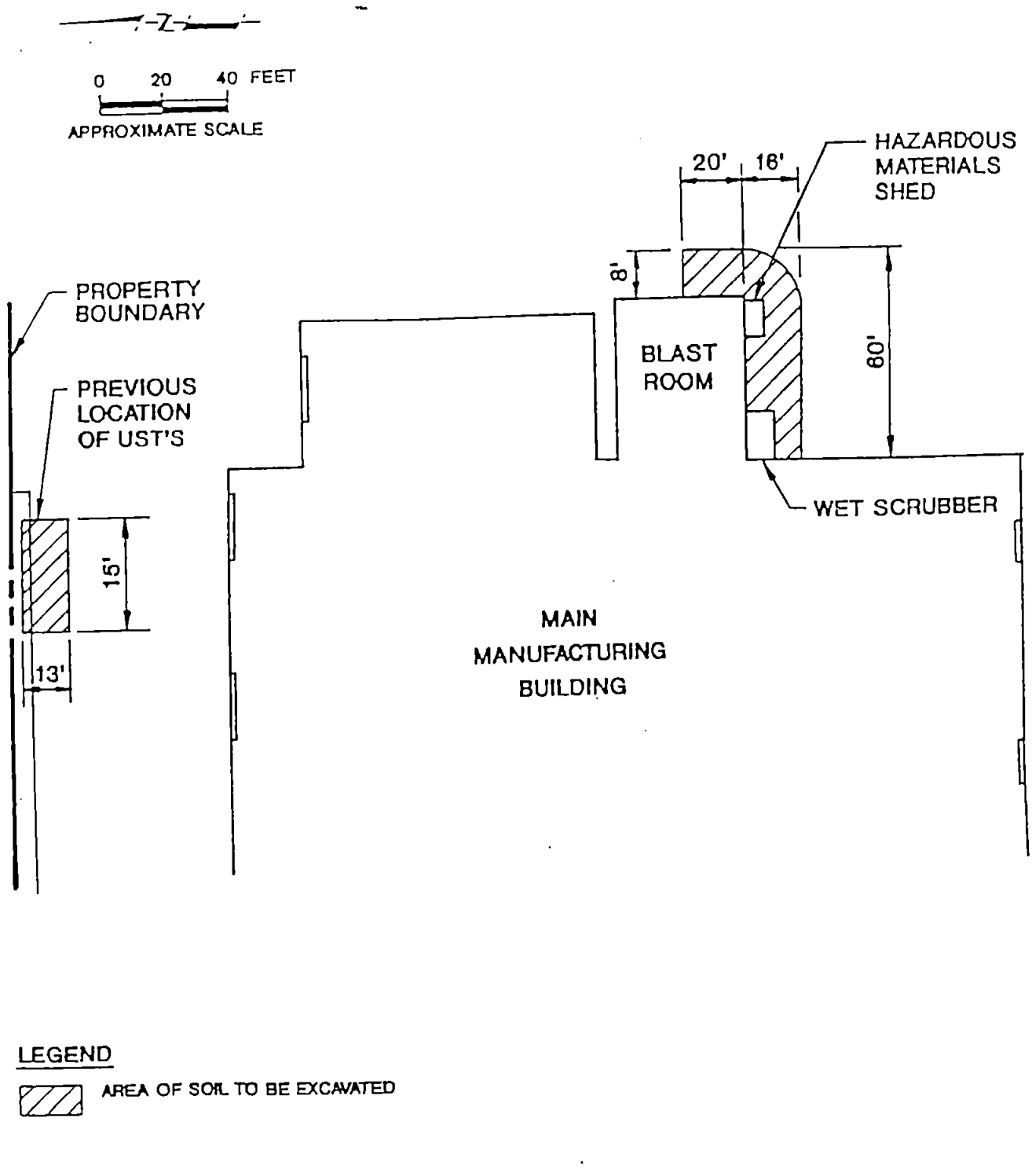
Harding Lawson Associates
Engineering and Environmental Services

SOIL EXCAVATION & SAMPLING LOCATIONS

KENT, WASHINGTON

FIGURE 3

DRAWN	JOB NUMBER	APPROVED	DATE	REVISED DATE
PS	20184.003.09		7/91	



Harding Lawson Associates
Engineering and Environmental Services

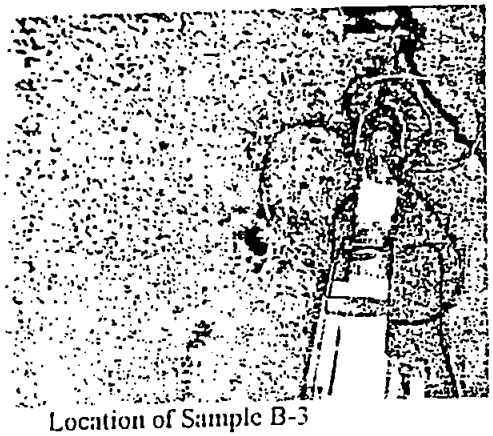
PLANNED SOIL EXCAVATION AREAS
18250 68TH AVENUE SOUTH
KENT, WASHINGTON

FIGUR
2

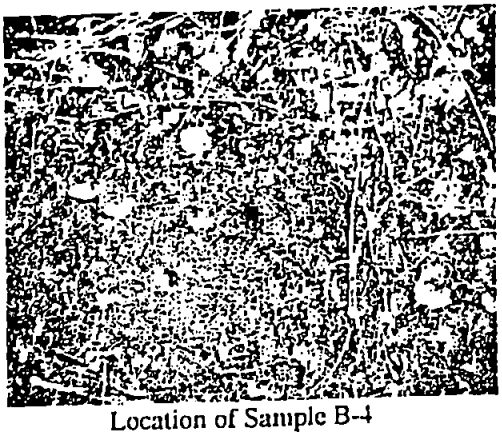
DRAWN	JOB NUMBER	APPROVED	DATE	REVISED DAT
PS	20184.003.09		7/91	

APPENDIX D

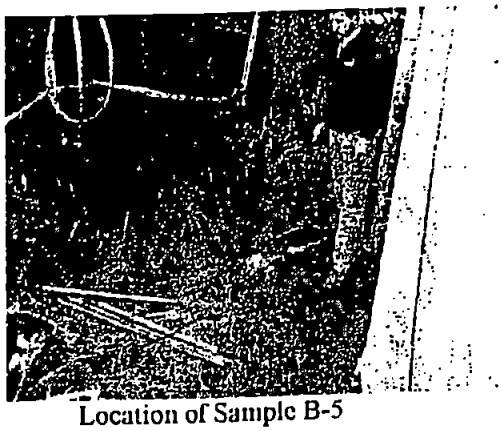
Copies of Selected Pages of TerraSolve's 2000-dated "Soil Analysis Project" Report



Location of Sample B-3



Location of Sample B-4



Location of Sample B-5

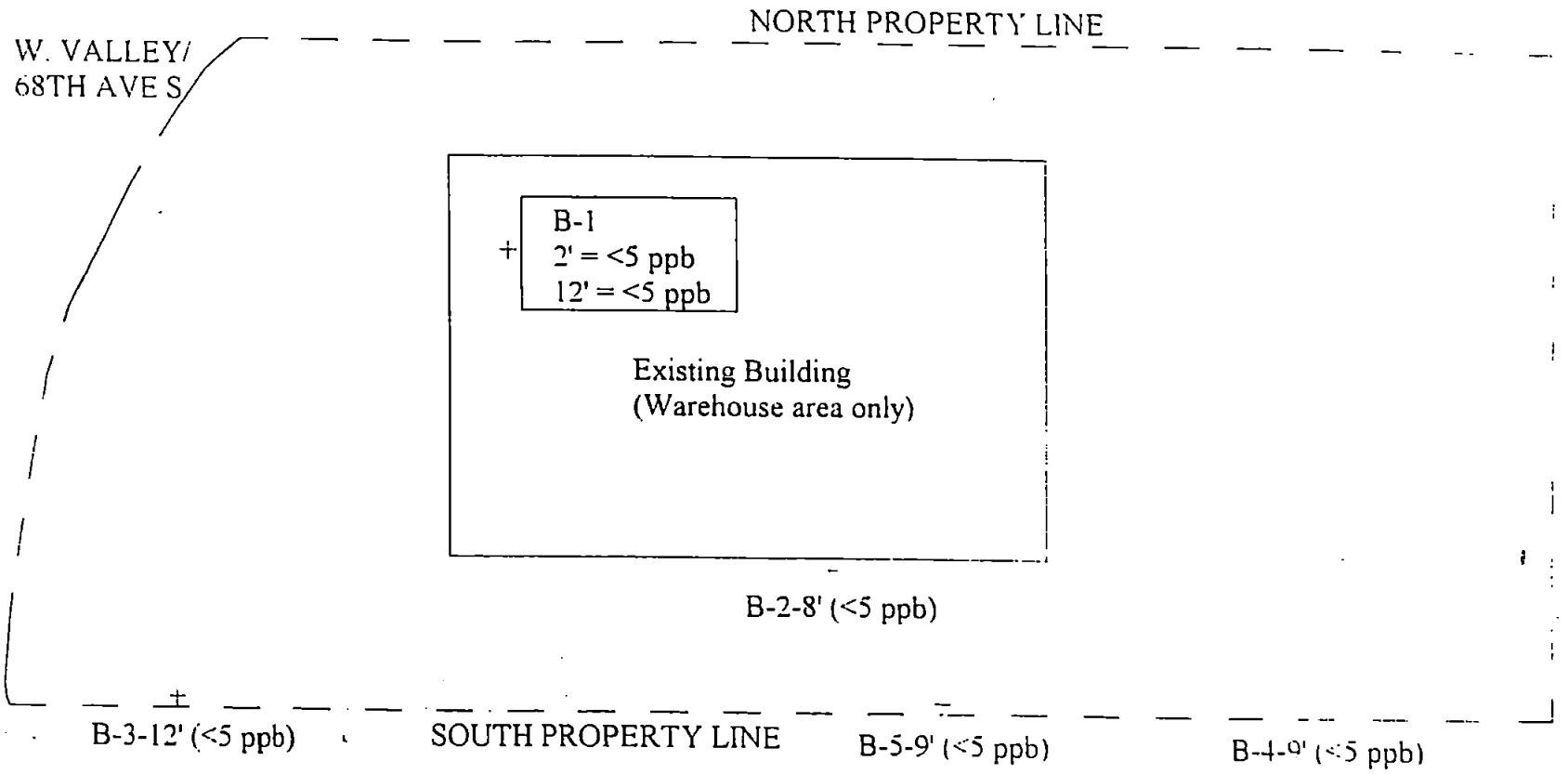
The samples were processed according to WA-DOE standards and transported under standard chain of custody for processing at Friedman & Bruya Inc., a Washington State certified laboratory. The samples were analyzed in accordance with EPA Method 8260B for the follow chlorinated solvents: Vinyl chloride. Chloroethane, 1,1-Dichloroethene. trans-1,2-Dichloroethene, 1,2-Dichloroethene (EDC), 1,1,1-Trichloroethane. Trichloroethane, Tetrachloroethene. These analyses were performed with the intent to confirm or deny the potential existence of chlorinated solvents within the soil strata of the above referenced property boundaries. The laboratory soil tests for all samples resulted in readings that were below 5 parts per billion (ppb or µg/Kg). The sample results indicate that in the areas sampled there is no indication of contamination by the above noted chlorinated solvents.

This report has been prepared using generally accepted professional practices related to the nature of the work accomplished. Findings and conclusions are not warranty (express or implied), guarantee or positive assertion as to the presence, absence or extent of hazardous substances at the above referenced subject property. This report does not represent TerraSolve's professional opinion and is only intended to report the data collected and reviewed by our professional staff to the level and effort authorized. This report does not include a comprehensive investigation of the area for all possible substances subject to regulation or potentially detrimental to human health and/or the environment.

10230 E. RIVERSIDE DRIVE
BOTHELL, WA 98011-3709

P: 425-488-2391
F: 425 486-6976

TERRA SOLVE



Site Map March 22, 2000	Project Number PSCI-WA-99-2583	Scale 1' = 100'
CAM Industries 18250 68TH Ave S Kent, WA 98032	N GRADIENT (negligible)	Figure MAP 1

TERRA SOLVE

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Volatile Compounds By EPA Method 8260B

Client Sample ID:	B-1 0-2'	Client:	Pacific Specialty Construction
Date Received:	02/09/00	Project:	Coates
Date Extracted:	02/01/00	Lab ID:	002004-04
Date Analyzed:	02/02/00	Data File:	020306.D
Matrix:	Soil	Instrument:	5972 - In
Units:	ug/kg (ppb)	Operator:	YA

Surrogates:	% Recovery	Lower Limit	Upper Limit
Dibromofluoromethane	102 J	50	150
1,2-Dichloroethane-d4	91 J	50	150
Toluene-d8	102 J	50	150
4-Bromofluorobenzene	95 J	50	150

Compounds:	Concentration ug/kg (ppb)
Vinyl chloride	<5 J
Chloroethane	<5 J
1,1-Dichloroethene	<5 J
trans-1,2-Dichloroethene	<5 J
1,1-Dichloroethane	<5 J
cis-1,2-Dichloroethene	<5 J
1,2-Dichloroethane (EDC)	<5 J
1,1,1-Trichloroethane	<5 J
Trichloroethene	<5 J
Tetrachloroethene	<5 J

J - The internal standard associated with the analyte is out of control limits. The reported concentration is an estimate.

Analysis For Volatile Compounds By EPA Method 8260B

Client Sample ID:	B-1 12-13'	Client:	Pacific Specialty Construction
Date Received:	02/01/00	Project:	Coates
Date Extracted:	02/01/00	Lab ID:	002004-05
Date Analyzed:	02/02/00	Data File:	020127.D
Matrix:	Soil	Instrument:	5972 - In
Units:	ug/kg (ppb)	Operator:	YA

Surrogates:	% Recovery	Lower Limit	Upper Limit
Dibromofluoromethane	110	50	150
1,2-Dichloroethane-d4	107	50	150
Toluene-d8	105	50	150
4-Bromofluorobenzene	89	50	150

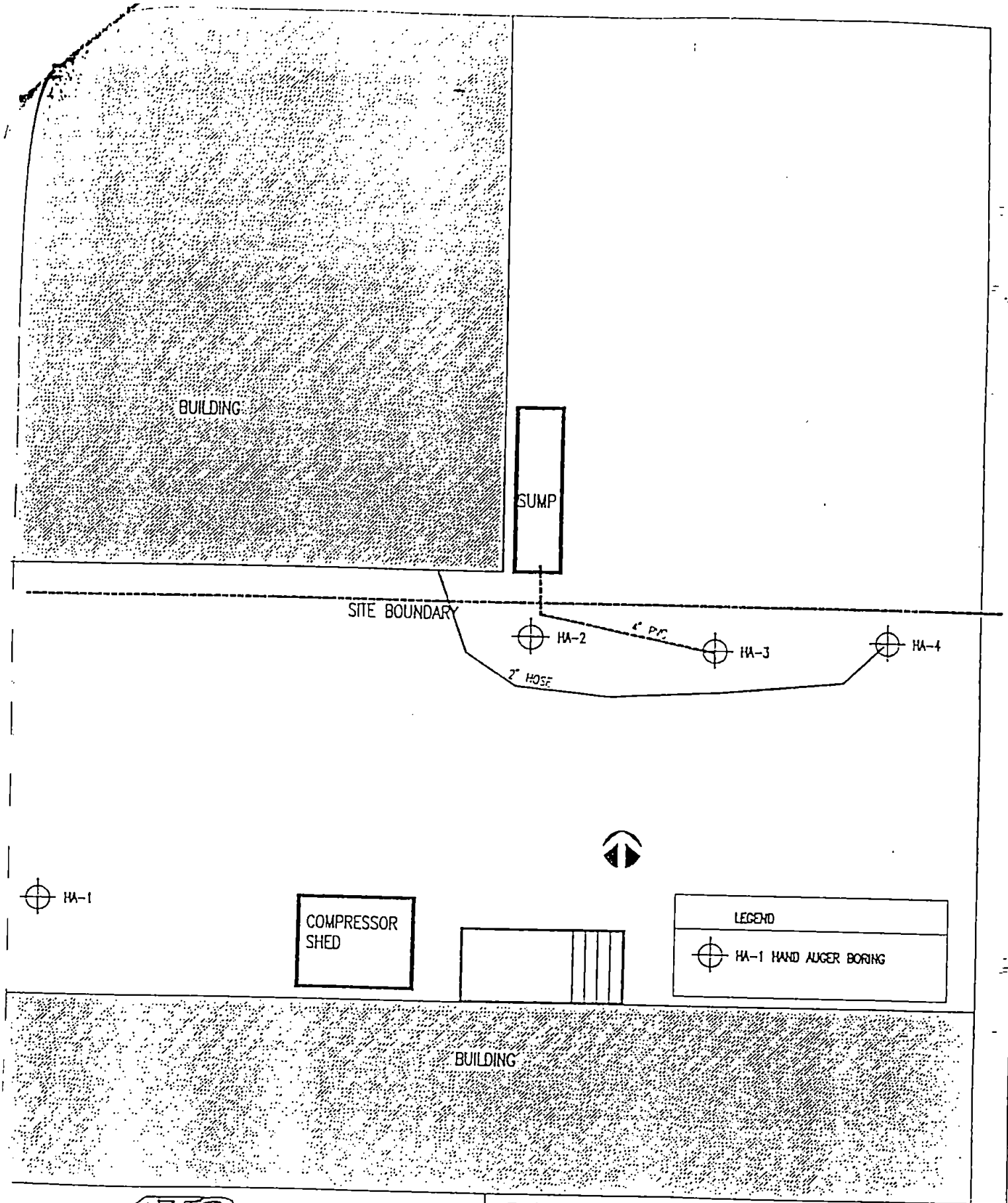
Compounds:	Concentration ug/kg (ppb)
Vinyl chloride	<5
Chloroethane	<5
1,1-Dichloroethene	<5
trans-1,2-Dichloroethene	<5
1,1-Dichloroethane	<5
cis-1,2-Dichloroethene	<5
1,2-Dichloroethane (EDC)	<5
1,1,1-Trichloroethane	<5
Trichloroethene	<5
Tetrachloroethene	<5

Analysis For Volatile Compounds By EPA Method 8260B

Client Sample ID:	B-2 8-10'	Client:	Pacific Specialty Construction
Date Received:	02/01/00	Project:	Coates
Date Extracted:	02/01/00	Lab ID:	002004-06
Date Analyzed:	02/02/00	Data File.	020128.D
Matrix:	Soil	Instrument:	5972 - In
Units:	ug/kg (ppb)	Operator:	YA

Surrogates:	% Recovery	Lower Limit	Upper Limit
Dibromofluoromethane	109	50	150
1,2-Dichloroethane-d4	107	50	150
Toluene-d8	106	50	150
4-Bromofluorobenzene	93	50	150

Compounds:	Concentration ug/kg (ppb)
Vinyl chloride	<5
Chloroethane	<5
1,1-Dichloroethene	<5
trans-1,2-Dichloroethene	<5
1,1-Dichloroethane	<5
cis-1,2-Dichloroethene	<5
1,2-Dichloroethane (EDC)	<5
1,1,1-Trichloroethane	<5
Trichloroethene	<5
Tetrachloroethene	<5



ATC ENVIRONMENTAL INC.

6347 Seaview Ave. NW
Seattle, WA 98107
(206)781-1449 FAX(206)781-1543

FIGURE 1- SAMPLE LOCATION PLAN
SUBSURFACE INVESTIGATION
CLIENT: EQUITABLE REAL ESTATE INVESTMENT MANAGEMENT INC.
SITE: WEST VALLEY BUSINESS PARK
KENT, WASHINGTON
ATC PROJECT NO. : 87076.0805

FRIEDMAN & BRUYA, INC.

ENVIRONMENTAL CHEMISTS

Analysis For Volatile Compounds By EPA Method 8260B

Client Sample ID:	B-3 12-13'	Client:	Pacific Specialty Construction
Date Received:	02/01/00	Project:	Coates
Date Extracted:	02/01/00	Lab ID:	002004-01
Date Analyzed:	02/02/00	Data File:	020123.D
Matrix:	Soil	Instrument:	5972 - In
Units:	ug/kg (ppb)	Operator:	YA

Surrogates:	% Recovery	Lower Limit	Upper Limit
Dibromofluoromethane	105	50	150
1,2-Dichloroethane-d4	102	50	150
Toluene-d8	104	50	150
4-Bromofluorobenzene	91	50	150

Compounds:	Concentration ug/kg (ppb)
Vinyl chloride	<5
Chloroethane	<5
1,1-Dichloroethene	<5
trans-1,2-Dichloroethene	<5
1,1-Dichloroethane	<5
cis-1,2-Dichloroethene	<5
1,2-Dichloroethane (EDC)	<5
1,1,1-Trichloroethane	<5
Trichloroethene	<5
Tetrachloroethene	<5

Analysis For Volatile Compounds By EPA Method 8260B

Client Sample ID:	B-4 9-11'	Client:	Pacific Specialty Construction
Date Received:	02/01/00	Project:	Coates
Date Extracted:	02/01/00	Lab ID:	002004-02
Date Analyzed:	02/02/00	Data File:	020124.D
Matrix:	Soil	Instrument:	5972 - In
Units:	ug/kg (ppb)	Operator:	YA

Surrogates:	% Recovery	Lower Limit	Upper Limit
Dibromofluoromethane	107	50	150
1,2-Dichloroethane-d4	108	50	150
Toluene-d8	107	50	150
4-Bromofluorobenzene	92	50	150

Compounds:	Concentration ug/kg (ppb)
Vinyl chloride	<5
Chloroethane	<5
1,1-Dichloroethene	<5
trans-1,2-Dichloroethene	<5
1,1-Dichloroethane	<5
cis-1,2-Dichloroethene	<5
1,2-Dichloroethane (EDC)	<5
1,1,1-Trichloroethane	<5
Trichloroethene	<5
Tetrachloroethene	<5

Analysis For Volatile Compounds By EPA Method 8260B

Client Sample ID:	B-5 8-11'	Client:	Pacific Specialty Construction
Date Received:	02/01/00	Project:	Coates
Date Extracted:	02/01/00	Lab ID:	002004-03
Date Analyzed:	02/02/00	Data File:	020125.D
Matrix:	Soil	Instrument:	5972 - In
Units:	ug/kg (ppb)	Operator:	YA

Surrogates:	% Recovery	Lower Limit	Upper Limit
Dibromofluoromethane	106	50	150
1,2-Dichloroethane-d4	103	50	150
Toluene-d8	103	50	150
4-Bromofluorobenzene	91	50	150

Compounds:	Concentration ug/kg (ppb)
Vinyl chloride	<5
Chloroethane	<5
1,1-Dichloroethene	<5
trans-1,2-Dichloroethene	<5
1,1-Dichloroethane	<5
cis-1,2-Dichloroethene	<5
1,2-Dichloroethane (EDC)	<5
1,1,1-Trichloroethane	<5
Trichloroethene	<5
Tetrachloroethene	<5

Analysis For Volatile Compounds By EPA Method 8260B

Client Sample ID:	Method Blank	Client:	Pacific Specialty Construction
Date Received:	02/01/00	Project:	Coates
Date Extracted:	02/01/00	Lab ID:	00-123 mb2
Date Analyzed:	02/01/00	Data File:	020122.D
Matrix:	Soil	Instrument:	5972 - In
Units:	ug/kg (ppb)	Operator:	YA

Surrogates:	% Recovery	Lower Limit	Upper Limit
Dibromofluoromethane	104	50	150
1,2-Dichloroethane-d4	107	50	150
Toluene-d8	102	50	150
4-Bromofluorobenzene	91	50	150

Compounds:	Concentration ug/kg (ppb)
Vinyl chloride	<5
Chloroethane	<5
1,1-Dichloroethene	<5
trans-1,2-Dichloroethene	<5
1,1-Dichloroethane	<5
cis-1,2-Dichloroethene	<5
1,2-Dichloroethane (EDC)	<5
1,1,1-Trichloroethane	<5
Trichloroethene	<5
Tetrachloroethene	<5

Date of Report: 02/09/00
Date Received: 02/01/00
Project: Coates

QUALITY ASSURANCE RESULTS FOR THE ANALYSIS OF SOIL SAMPLES FOR VOLATILES BY EPA METHOD 8260B

Laboratory Code: 001091-03 (Duplicate)

Analyte	Reporting Units	Sample Result	Duplicate Result	Relative Percent Difference	Acceptance Criteria
1,1-Dichloroethene	µg/kg (ppb)	<5	<5	nm	0-20
Trichloroethene	µg/kg (ppb)	<5	<5	nm	0-20

Laboratory Code: 001091-03 (Matrix Spike)

Analyte	Reporting Units	Spike Level	Sample Result	% Recovery MS	% Recovery MSD	Acceptance Criteria	Relative Percent Difference
1,1-Dichloroethene	µg/kg (ppb)	50	<5	73	73	50-150	0
Trichloroethene	µg/kg (ppb)	50	<5	48 ip	45 ip	50-150	5

Laboratory Code: Laboratory Control Sample

Analyte	Reporting Units	Spike Level	% Recovery LCS	% Recovery LCSD	Acceptance Criteria	Relative Percent Difference
1,1-Dichloroethene	µg/kg (ppb)	50	95	99	50-150	4
Trichloroethene	µg/kg (ppb)	50	86	87	50-150	1

nm - The analyte was not detected in one or more of the duplicate analyses. Therefore, calculation of the RPD is not applicable.

ip - Recovery fell outside of normal control limits. Compounds in the sample matrix interfered with the quantitation of the analyte.

APPENDIX E

Copies of Recent Waste Disposal Manifests and PSCAA Registration Certificate

M42c | REC'D JUN 02 2003 | 14147

Please Print or Type (Form designed for use on elite (12 pitch) typewriter) DI584509 Form Approved OMB No 2050 0039

UNIFORM HAZARDOUS WASTE MANIFEST

1 Generator's US EPA ID No: WAD009247107 | Manifest Document No: 14509 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: Coatings Unlimited, 18420 - 68Th Ave, Kent, WA 98032 Attn: Paul Adams

4 Generator's Phone: (425) 251-3269

A. State Manifest Document Number:

B. State Generator's ID: 18420 - 68Th Ave Kent, WA 98032

5. Transporter 1 Company Name: Clean Harbors Env Services Inc | 6. US EPA ID Number: MAD039322250 | C. State Transporter's ID:

D. Transporter's Phone: (781) 849-1800

7 Transporter 2 Company Name: MANIFEST | 8. US EPA ID Number: CAT000624247 | E. State Transporter's ID:

F. Transporter's Phone: 800-468-3336

9. Designated Facility Name and Site Address: Clean Harbors Aragonite LLC, 11800 North Aptus Road, Aragonite, UT, 84029 | 10. US EPA ID Number: UTD981552177 | G. State Facility's ID: 84800199999

H. Facility's Phone: (801) 323-8100

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE PAINT, 3, UN1263, PG II	X	003	DM	01500	P	D001 D035 F003 F005
b. WASTE PAINT, 3, UN1263, PG II	X	008	DM	03800	P	D001 D035 F003 F005
c. HAZARDOUS WASTE, SOLID, N.O.S., 9, NA3077, PG III	X	001	DM	00050	P	D001 D035 F003 F005
d.						

J. Additional Descriptions for Materials Listed Above
11a.ERG#127 (S),(I,E) 3x55GDM 11c.ERG#171 (S),(I,E) 1x30GDM
11b.ERG#127 (L),(I,E) #1-8 8x55GDM

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
11a: WACOT-2422355 11b: WACOT-2422359 11c: WACOT-2422348
24 HOUR EMERGENCY # (800) 645 - 8265

DI584509

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: GLENN WAGENER | Signature | Month Day Year: 10/29/03

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: BOB NUTTLE for CHES | Signature | Month Day Year: 10/29/03

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: JACK Houston | Signature | Month Day Year: 05/03/03

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Allison Christensen | Signature | Month Day Year: 05/16/03

Style CF-17 LABELMASTER (800) 621-5808 www.labelmaster.com

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete

Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.

ORIGINAL-RETURN TO GENERATOR

DOMINK

ATC ENVIRONMENTAL INC.

Glen R. Scott
EQUITABLE LIFE ASSURANCE SOCIETY OF THE UNITED STATES
Two Union Square
601 Union Street, Suite 2812
Seattle, Washington 98101

February 11, 1997

RE: LIMITED GROUNDWATER INVESTIGATION
WEST VALLEY BUSINESS PARK
18401 & 18601 72ND AVENUE SOUTH
KENT, WASHINGTON
PROJECT NO. 87076.0806

Dear Mr. Scott:

At the request of Equitable Life Assurance Society of the United States (Equitable), ATC Environmental Inc. (ATC), performed a Limited Groundwater Investigation at West Valley Business Park located at 18401 & 18601 72nd Avenue South, Kent, Washington (project area). The purpose of this investigation was to determine if there was any environmental impact to groundwater from the neighboring property to the north. ATC had performed a previous Limited Subsurface Investigation in which project area soil was investigated (reference Limited Subsurface Investigation, Project No. 87076.0805). Based on the results of the previous investigation, this Limited Groundwater Investigation was performed.

BACKGROUND

The adjoining property to the north, based on exterior site observations, conducts painting and coating of large steel components. The area between the project area and neighboring property is a strip of land that appears to serve in part as a drainage swale for stormwater runoff. Most of this strip of land is indicated to be part of the subject site which extends 15 feet northward from the building to the property line. This strip of land runs along the backside of one of the project area buildings. This area is not readily observable from the majority of the project area or surrounding streets.

On the adjoining property to the north, ATC observed drum storage areas near the property line. One of these drum storage areas was floored and curbed with concrete and was covered. One of the drums was observed to be labeled as methyl ethyl ketone (2-butanone) which is a regulated hazardous substance.

An open concrete-lined sump is located on the adjoining property near the property line. The sump contains murky water with a light sheen. A sump pump discharges into a four inch PVC discharge line that runs from the sump to a discharge point onto the strip of land between the respective properties. The discharge line traverses along the strip of land for a distance of approximately 50 feet. The discharge line appears to be used frequently based on the appearance of the soil located at the discharge point. No active discharging has been observed during successive site visits and investigations. The purpose of the sump and the nature of the discharge is unknown.

ATC's previous Limited Subsurface Investigation included four (4) hand borings that were drilled on November 25, 1996. These borings were identified as HA-1, HA-2, HA-3, and HA-4 (see Figure 1 Site Plan). HA-2 was located near the sump. HA-3 was located at at the PVC line discharge point. HA-4 was

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The analytical results are presented in the following tables:

TABLE 1. ANALYTICAL RESULTS - TOTAL PETROLEUM HYDROCARBONS - DIESEL AND OIL (in parts per billion)

Boring No./Sample No.	Diesel	Oil	Cumulative*
B-1 / 12497-1	520	1,290	1,810
B-2 / 12497-2	550	ND	550
B-3 / 12497-3	250	ND	250
Laboratory Method Reporting Limit (MRL)	250	750	not applicable
MTCA Method A Cleanup Level	1,000	1,000	1,000

* Cleanup level based on cumulative value for all total petroleum hydrocarbons

TABLE 2. ANALYTICAL RESULTS - VOLATILE ORGANIC COMPOUNDS (in parts per billion)

Analyte	B-1/12497-1	B-2/12497-2	B-3/12497-3	Cleanup Level
Chloromethane	1.8	0.5	0.8	3.37**
Carbon Disulfide	0.5	ND	ND	800**
2-Butanone (MEK)	ND	37	ND	4,800**
Trichloroethene (TCE)	0.5	3.0	0.6	5.0*
Toluene	0.7	ND	ND	40.0*
Tetrachloroethene (PCE)	ND	0.9	1.0	5.0*
Ethylbenzene	2.7	ND	ND	30.0*
Total Xylenes	15	ND	ND	20.0*

* MTCA Method A Cleanup Level
** MTCA Method B Cleanup Level

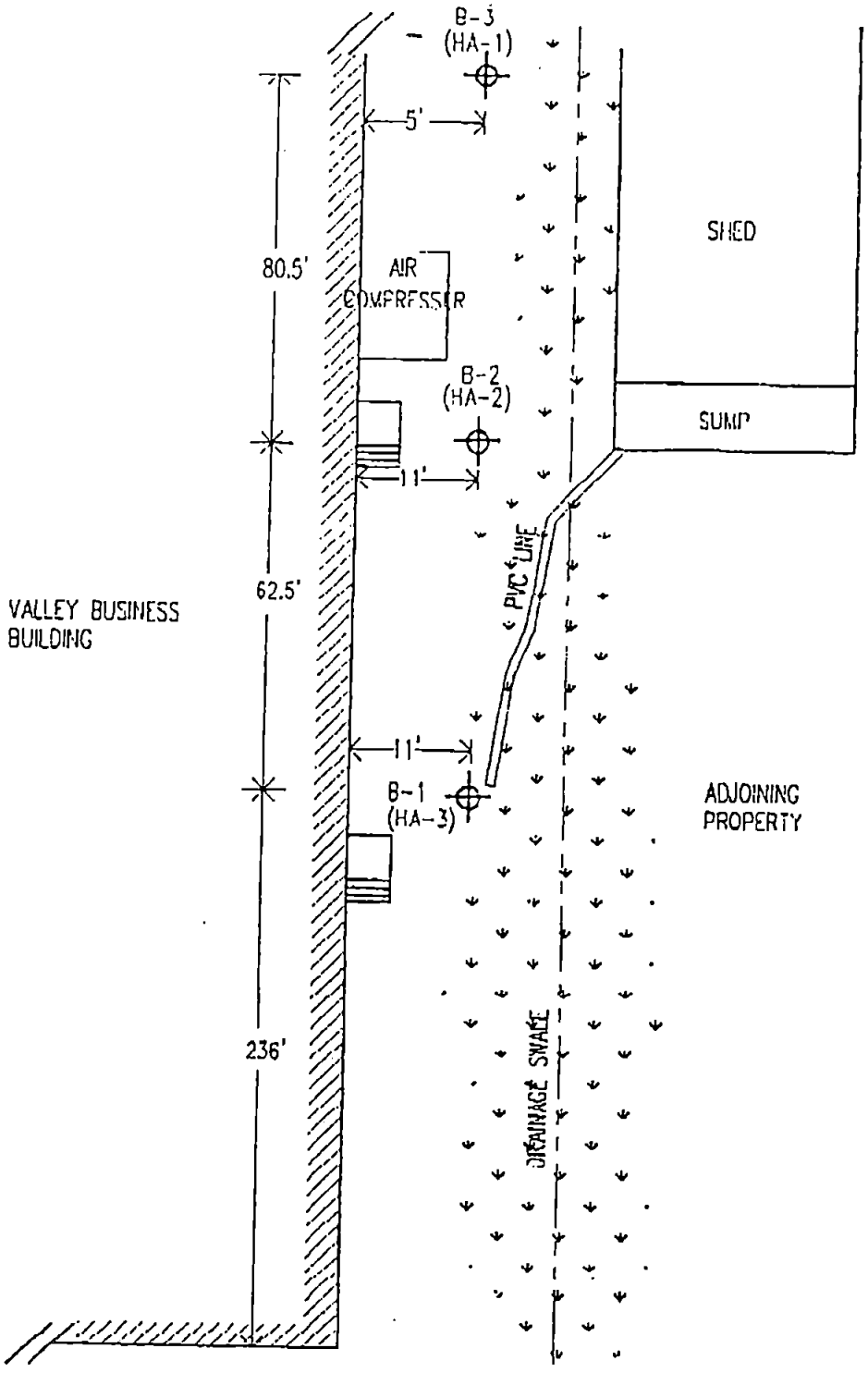
FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

The project area is impacted by diesel and oil-range petroleum hydrocarbons in groundwater above the MTCA Method A cleanup level at the PVC pipe discharge from the sump (B-1). Soil is also impacted at this area and also near the sump as determined during the previous Limited Subsurface Investigation.

Selected VOC's were found to be present in the groundwater at low levels. All the detected VOCs were below the applicable MTCA Method A and B cleanup levels for each of the detected analytes. These detected VOCs are typical solvent ingredients.

Based on the previous investigation, two areas of soil are impacted above regulatory cleanup levels with respect to TPH. The most likely source is from the adjoining property to the north which conducts painting and was observed to store hazardous substances. The extent of the impact in the project area appears limited. However, it is unknown to what extent the impact may exist on the adjoining property. It may be possible to excavate the impacted areas on the project area and also to possibly remediate groundwater by pump and treat methods. However, without knowing the extent of the problem on the adjoining property, there is always a possibility that further impacts to the project area may occur in the future from the adjoining property.

ATC would recommend that the adjoining property owner be contacted and presented with these findings. The adjoining property owner should also remove the existing discharge points. It appears that these discharge points may violate existing wastewater discharge regulations. ATC would recommend



NOTE: HA-4 NOT SHOWN ON THIS PLAN

DRAWING NO. 1 SITE PLAN	DRAWN BY: DMV CHECKED BY: NRG DATE: 2/3/97 PROJECT NO. 87076.0806	NORTH	CLIENT: WEST VALLEY BUSINESS CENTER / EQUITABLE PROJECT: GROUNDWATER INVESTIGATION WEST VALLEY BUSINESS PARK KENT, WASHINGTON PROJECT NO. :87076.0806	AVC ENVIRONMENTAL, INC. Solutions For Environmental Concerns 6347 Seaview Ave. NW Seattle, WA 98107 (206)781-1449 FAX(206)781-1543

ATC ASSOCIATES INC.
ENVIRONMENTAL, GEOTECHNICAL AND MATERIALS PROFESSIONALS

May 28, 1997

Equitable Life Assurance Society of the United States
c/o Glen R. Scott
Vice President - Pacific Northwest Division
EQUITABLE REAL ESTATE INVESTMENT MANAGEMENT INC.
Two Union Square, Suite 2812
601 Union Street
Seattle, Washington 98101

RE: ADDITIONAL SOIL SAMPLING AT COMPRESSOR
WEST VALLEY BUSINESS PARK
18401 & 18601 72ND AVENUE SOUTH
KENT, WASHINGTON
PROJECT NO. 87076.0807

Dear Mr. Scott:

At the request of Equitable Life Assurance Society of the United States (Equitable), ATC Associates Inc. (ATC) performed additional soil sampling at the air compressor area located on the north side of the 18601 72nd Avenue South building (Caravali Coffee) which is part of the above referenced property (project area). The purpose of the additional soil sampling was to collect a soil sample at the compressor area and compare the analytical results and associated chromatograms to previous analytical results from this general area (reference Limited Subsurface Investigation, ATC Project No. 87076.0805, January 6, 1997 and Limited Groundwater Investigation, ATC Project No. 87076.0806, February 11, 1997).

BACKGROUND

Activities on the adjoining property to the north appear to include painting and coating. The strip of land between the project area and the adjoining property to the north has been the subject of ongoing investigation by ATC as referenced above. These investigations were prompted by the presence of a concrete-lined sump on the adjoining north property which discharged into a 4 inch PVC pipe onto the project area. ATC's initial investigation (reference Limited Subsurface Investigation, ATC Project No. 87076.0805) revealed soil on the project area had been impacted at the discharge point and near the concrete-lined sump. Further investigation by ATC (reference Limited Groundwater Investigation, ATC Project No. 87076.0806, February 11, 1997) revealed that groundwater was also impacted at these locations.

ATC's scope of work for this investigation was designed to address the conclusions presented by the north adjoining property owner, CAM Properties, as presented in a report by Pacific Specialty Construction, Inc. (PSCI) dated April 2, 1997. PSCI had concluded that the petroleum-impacted soil and groundwater revealed by ATC's investigations were the result of of an air bleed off-vent which discharges under a stairwell next to the project area building. The PSCI report eliminated the air compressor as a direct source of impact since it is confined and separated from the impacted area. PSCI indicated that the air bleed-off vent was within 4 linear feet of ATC's sampling point HA-2. The bleed-off vent is actually approximately 30 linear feet from HA-2.

[illegible] Seattle, WA 98107 • (206) 781-1449 FAX (206) 781-1543

EXHIBIT D

stairwell air bleed-off vents to have migrated this distance and be detected at the levels found at HA-2. Furthermore, HA-2 was within approximately 5 feet of the concrete sump on the north adjoining property.

The chromatograms for the previous soil and water samples from HA-2 (soil sample nos. HA-2-2.0 and HA-2-4.0 and water sample nos. 12497-2) are not similar to the chromatograms of the compressor oil and the soil samples collected at the compressor bleed-off (sample no. S-1) and air bleed-off under the stairwell (sample no. S-2). In general, the peak elution times (shown on the lower axis) for the HA-2 soil samples (sample nos. HA-2-2.0 and HA-2-4.0) begin and end sooner than shown for the soil samples (sample nos. S-1 and S-2). The soil samples (sample nos. S-1 and S-2) are nearly identical and show the presence of compressor oil as well as another petroleum-like product (second thicker peak on the chromatogram) not found in the samples from HA-2. The HA-2 soil and water samples do not indicate the presence of compressor oil when compared to the compressor oil chromatogram. The chromatograms from the following are attached:

Soil Sample Nos. HA-2-2.0 and HA-2-4.0 (concrete sump area)
Water Sample No. 12497-2 (from the HA-2 sample point)
Soil Sample No. S-1 (compressor bleed-off area)
Soil Sample No. S-2 (air bleed-off area under stairwell)
Compressor Oil (Sullair – Suilube 32 – Compressor Fluid)

The soil samples at the compressor bleed-off (sample no. S-1) and stairwell air bleed-off (sample no. S-2), as would be expected, show this area to be impacted by compressor oil and motor oil. The presence of diesel range-range hydrocarbons show the beginning of oil which elutes in the diesel region on the chromatograms. The analytical results for sample no. S-1 show compressor oil at 89,000 parts per million (ppm) and motor oil at 20,000 ppm. The analytical results for sample no. S-2 show motor oil at 130,000 ppm. A compressor oil standard was not run for sample no. S-2.

It is ATC's conclusion that, based on the distance from HA-2 and the chromatogram comparison, the compressor bleed-off and stairwell air bleed-off areas are not a source of the petroleum hydrocarbon-impact at the HA-2 sample point.

If you have any questions regarding this report, please call us in our Seattle office.

Sincerely,

ATC ASSOCIATES INC.

Neil R. Gilham, CHMM
Project Manager

Jane P. Rowcliffe, CSP
Director, National Client Accounts

Attachments

cc: Brice Williams, Equitable
Rick Kolpa, R.J. Hallissey

Versar INC.

COPY

PHASE I ENVIRONMENTAL SITE ASSESSMENT AND LIMITED PHASE II ACTIVITIES

WEST VALLEY BUSINESS PARK
18401-18657 72ND AVENUE SOUTH
KENT, WASHINGTON 98032

Prepared for:

AMB Property, L.P.
505 Montgomery Street, Fifth Floor
San Francisco, California 94111

Versar Project No. 4176-207

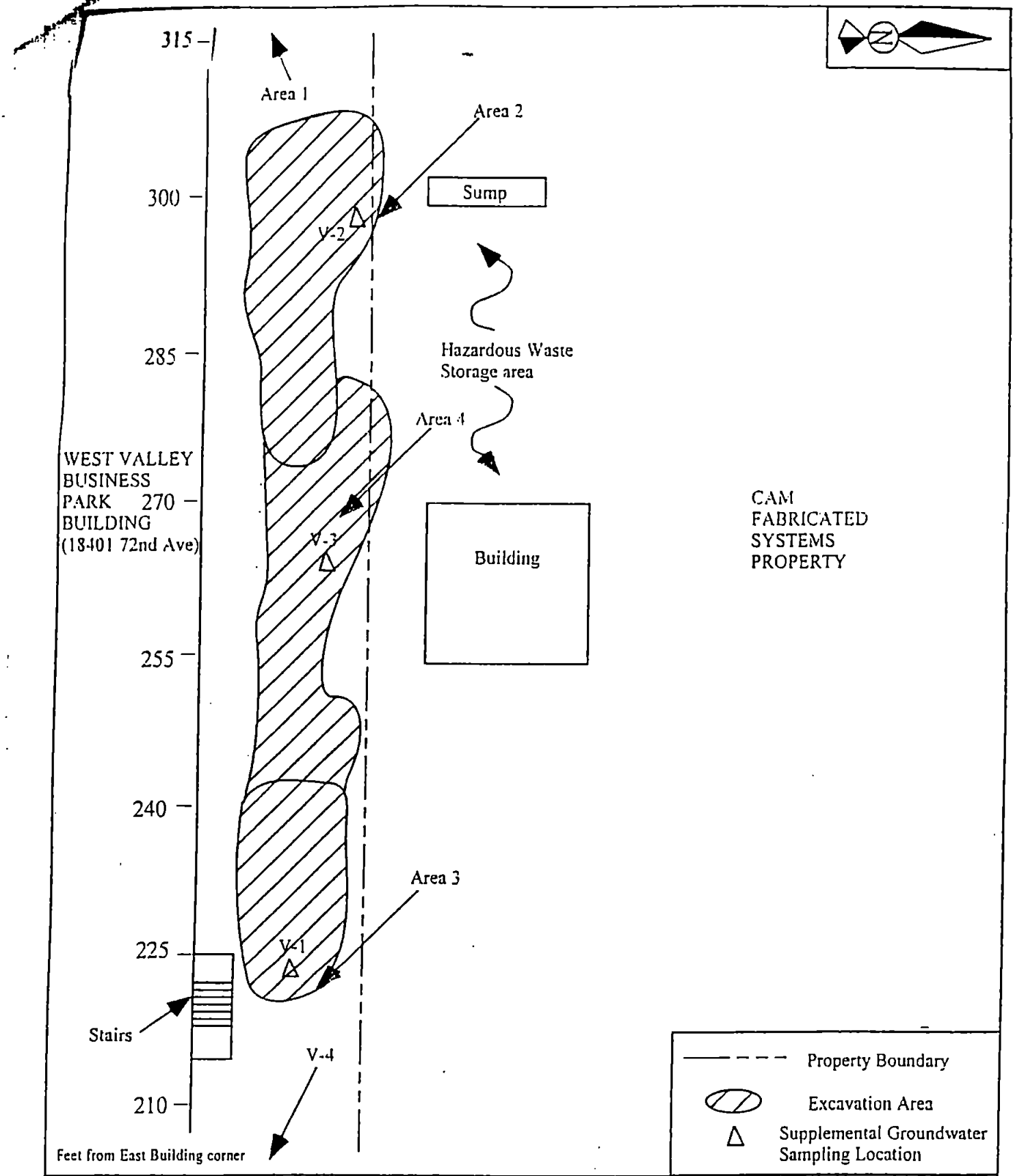
November 24, 1998

This document has been prepared in accordance with accepted scientific and engineering practices and procedures and Versar, Inc.'s Quality Assurance Program.

Prepared by: _____ 11/24/98
for Gary L. Dyner — Date
Environmental Scientist

Approved by: _____ 11/24/98
Scott Allin — Date
Senior Program Manager

• SACRAMENTO OFFICE •
7844 MADISON AVENUE, SUITE 167 • FAIR OAKS, CALIFORNIA 95628 • TELEPHONE: (916) 962-1612 FAX: (916) 962-2678



Detailed By: AEC Scale Approximate 1 inch = 12 feet Project: 4174-207	Werner 7844 MADISON AVENUE SUITE 167 FAIR OAKS, CA 95628 (916) 962-1612	West Valley Business Park Kent, Washington	Soil Excavation and Groundwater Sampling Locations	FIG 3

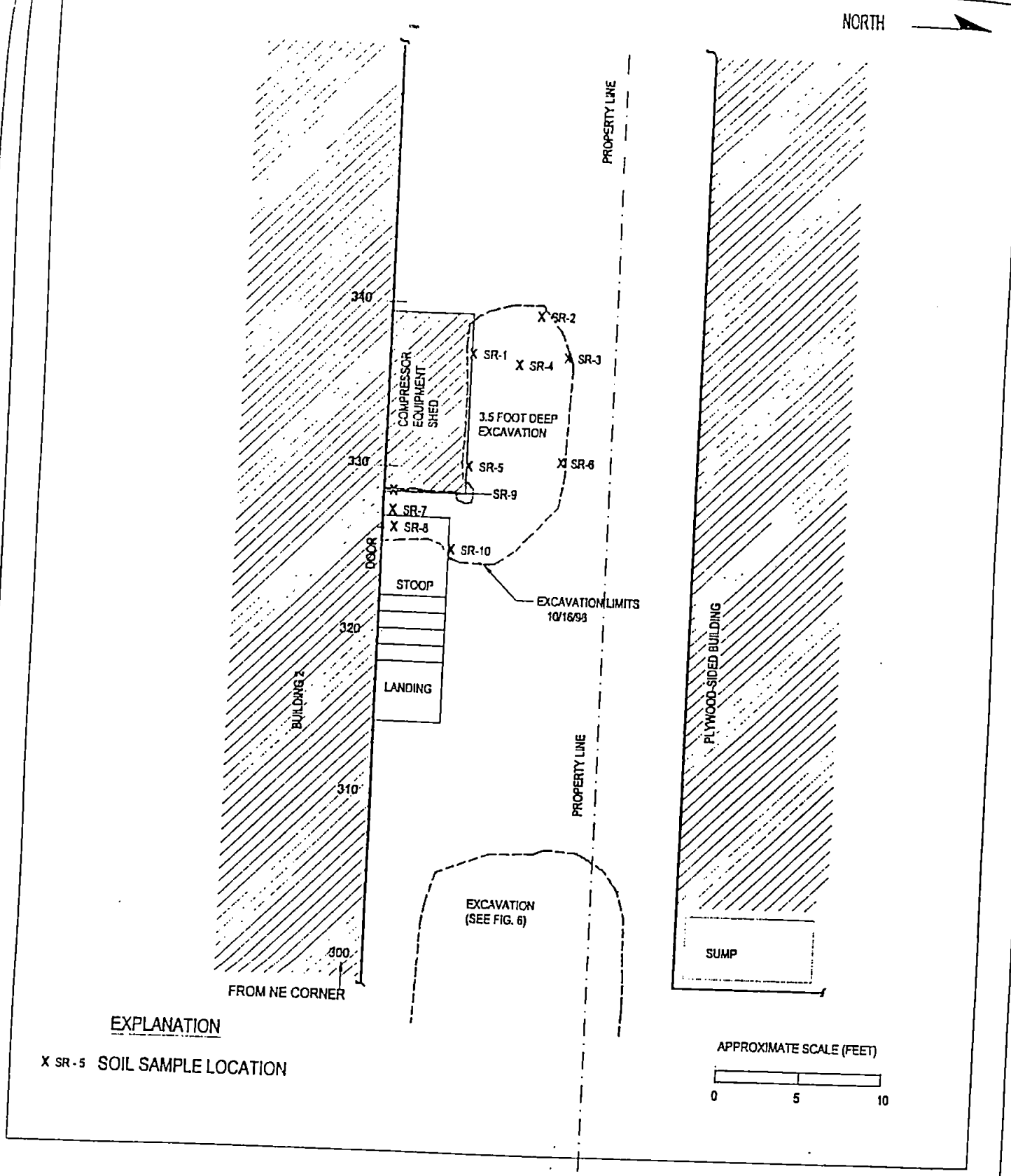
2.2 Eastern Excavation – Sump Area and Sump Discharge Area

On October 16, 1998, the area adjacent to CAM Properties sump was excavated (see Figure 6). This area had been identified during ATC's previous investigation (*Limited Subsurface Investigation*, January 6, 1997) as an area with diesel- and oil-range petroleum hydrocarbons exceeding MTCA Method A Cleanup Levels. The excavation was dug to approximately 4 feet bgs, except near the sump at hand auger location HA-2 (Figure 4) from ATC's previous investigation (*Limited Subsurface Investigation*, January 6, 1997) where the excavation was dug to 6 feet bgs. The excavation was dug to 6 feet bgs in this location because the previous investigation indicated that petroleum hydrocarbons exceeded MTCA Method A Cleanup Levels at 4 feet bgs in this location (hand auger location HA-2).

During the course of the excavation work on October 16, 1998, a dark layer of soil with a strong petroleum odor was noted on the eastern wall of the excavation. This layer was found approximately 2 feet bgs, varying in thickness from 1 to 6 inches and in width from 2 to 5 feet wide. This layer also included matted roots, grass, and occasional metal machine turnings, crushed cans, and other debris. The dark layer appeared to have been the former soil surface that was later buried. The excavation was continued eastward, "chasing" the dark layer. The limits of the dark layer had not been defined by the end of the work day.

The excavation work was halted at the end of day (October 16, 1998) and confirmatory samples were collected (sample nos. SR-11 through SR-22). Sample no. SR-22 was collected from the dark layer at the eastern limit of the excavation. These soil samples were analyzed for the presence of diesel- and oil-range petroleum hydrocarbons using Ecology Method WTPH-D extended. No diesel- and oil-range petroleum hydrocarbons were detected in the sample nos. SR-11 through SR-17. Diesel- and oil-range petroleum hydrocarbons were detected in the sample nos. SR-18, SR-19, and SR-20 at less than the 200 milligram per kilogram (mg/kg) MTCA Method A Cleanup Level. Sample nos. SR-21 and SR-22 both contained concentrations of diesel- and oil-range petroleum hydrocarbons that exceeded the MTCA Method A Cleanup Level. Sample no. SR-21 contained a concentration of 560 mg/kg diesel-range petroleum hydrocarbons and 1,300 mg/kg oil-range hydrocarbons. Sample no. SR-22 from the dark layer contained a concentration of 25,000 mg/kg diesel-range petroleum hydrocarbons and 120,000 mg/kg oil-range hydrocarbons. According to the laboratory, the detected diesel concentrations are attributed to an oil-range product eluting partially in the diesel range. The analytical results are summarized in Table 1.

On October 17, 1998, the area around the former sump discharge location was excavated (see Figure 6). This area had been identified during ATC's previous investigation (*Limited Subsurface Investigation*, January 6, 1997) as an area with diesel- and oil-range petroleum hydrocarbons exceeding MTCA Method A Cleanup Levels. This excavation was located approximately 35 feet east of the excavation dug on October 16, 1998. The excavations were subsequently connected on October 19, 1998 to form one large excavation. The October 17, 1998, excavation was dug to approximately 4 feet bgs. The excavation work was halted at the end of day and confirmatory samples were collected from the bottom and sidewalls of the excavation (sample nos. SR-23 through SR-30). These soil samples were analyzed for the presence of diesel- and oil-range petroleum hydrocarbons using Ecology Method WTPH-D extended. No diesel- or oil-range petroleum hydrocarbons were detected in sample nos. SR-24, SR-25, and SR-28 through SR-31. Diesel- and oil-range petroleum hydrocarbons were detected in sample nos. SR-26 and SR-27 at less than the 200 milligram per kilogram (mg/kg) MTCA Method A Cleanup Level. Sample no. SR-23 contained concentrations of diesel- and oil-range petroleum hydrocarbons that exceeded the MTCA Method A Cleanup Level. Sample no. SR-23 contained 2,900 mg/kg of diesel-range petroleum hydrocarbons and 7,800 mg/kg of oil-range hydrocarbons. According to the laboratory, the detected diesel concentrations were attributed to an oil-range product eluting partially in the diesel range. The analytical results are summarized in Table 1.



ATC ASSOCIATES INC.
6347 SEAVIEW AVE. NW
SEATTLE, WA 98107
206.781.1449
FAX: 206.781.1543

PROJECT: INDEPENDENT REMEDIAL ACTION
PETROLEUM CONTAMINATED SOIL REMEDIATION
WEST VALLEY BUSINESS PARK
KENT, WASHINGTON
CLIENT: LEND LEASE REAL ESTATE INVESTMENTS
ATC Project Number 87076.0808

FIGURE 5
EXCAVATION AND SAMPLE LOCATION PLAN-COMPRESSOR AREA

TABLE 1: SOIL SAMPLE SUMMARY AND ANALYTICAL RESULTS

Sample No.	Analytical Results (mg/kg)		Date	Depth (Ft.)	Coordinates**		Type
	Diesel	Oil			West	North	
SR-1	ND	ND	10/16/98	1.5	336.5	6	Wall
SR-2	ND	ND	10/16/98	2	340	9	Wall
SR-3	ND	ND	10/16/98	2	336.5	10.5	Wall
SR-4	ND	ND	10/16/98	3.5	336.5	8.5	Floor
SR-5	ND	ND	10/16/98	1.5	331.5	6	Wall
SR-6	ND	ND	10/16/98	2	331	10.5	Wall
SR-7	ND	ND	10/16/98	2.5	327.5	1	Wall
SR-8	ND	ND	10/16/98	1.5	326	1	Wall
SR-9	ND	ND	10/16/98	1.5	328.5	1	Wall
SR-10	ND	ND	10/16/98	2	325	4	Wall
SR-11	ND	ND	10/16/98	6.5	301	13.5	Floor
SR-12	ND	ND	10/16/98	2.5	307	14	Side
SR-13	ND	ND	10/16/98	2.5	304	4.5	Side
SR-14	ND	ND	10/16/98	4	300	9	Floor
SR-15	ND	ND	10/16/98	2	294	5	Side
SR-16	ND	ND	10/16/98	2.5	292	13.5	Side
SR-17	ND	ND	10/16/98	3.5	291	10	Floor
SR-18	33	60	10/16/98	2	287	12	Side
SR-19	48	140	10/16/98	2	283	7	Side
SR-20	78	190	10/16/98	3	279	9	Floor
SR-21*	560	1,300	10/16/98	2	277	13.5	Side
SR-22*	25,000	120,000	10/16/98	2	275	10	Side
SR-23*	2,900	7,800	10/17/98	2	241	11	Side
SR-24	ND	ND	10/17/98	2	241	4.5	Side
SR-25	ND	ND	10/17/98	2	234	4.5	Side
SR-26	26	99	10/17/98	2	235	13	Side
SR-27	37	190	10/17/98	2	228	13	Side
SR-28	ND	ND	10/17/98	2	226	4.5	Side
SR-29	ND	ND	10/17/98	2	222	10	Side
SR-30	ND	ND	10/17/98	3.5	226	10	Floor
SR-31	ND	ND	10/17/98	3.5	232	9.5	Floor
SR-32	64	170	10/19/98	3	275	12.5	Floor
SR-33*	94	360	10/19/98	2	270	7	Wall
SR-34	ND	ND	10/19/98	3	265	10.5	Floor
SR-35	ND	ND	10/19/98	2	260	13	Wall
SR-36	ND	ND	10/19/98	2	259	5.5	Wall
SR-37	ND	ND	10/19/98	3	255	8	Floor
SR-38	48	78	10/19/98	2	250	10.5	Wall
SR-39	ND	ND	10/19/98	2	250	5.5	Wall
SR-40	ND	ND	10/19/98	3	244	8	Floor
SR-41*	190	1,200	10/19/98	2	244	13	Wall
SR-42	ND	ND	10/22/98	2	270	3	Wall
SR-43	ND	56	10/22/98	3	243	14	Floor
MTCA Method A	200	200					

ND = none detected

* = sample location over-excavated

** = coordinates established from point of origin at northeast corner of Building 2

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (425) 649-7000

August 30, 1999

Mr. Matt Leedham and
Mr. Steve Campbell
AMB Property L.P.
505 Montgomery Street, 5th Floor
San Fancisco, CA 94111

Dear Mr. Leedham & Mr. Campbell

Re: Independent Remedial Action
West Valley Business Park
18401 & 18601 72nd Avenue South
Kent, WA 98032

Thank you for submitting the results of your independent remedial actions for review by the State of Washington Department of Ecology (Ecology). Ecology appreciates your initiative in pursuing this administrative option under the Model Toxics Control Act (MTCA).

Ecology's Toxics Cleanup Program has reviewed the following information regarding the West Valley Business Park facility located at 18401 and 18601 72nd Avenue South, Kent, Washington:

1. Limited Subsurface Investigation West Valley Business Park
18401 & 18601 72nd Avenue South, Kent, Washington
ATC Associates Inc., January 6, 1997

2. Limited Groundwater Investigation West Valley Business Park
18401 & 18601 72nd Avenue South, Kent, Washington
ATC Associates Inc., February 11, 1997

3. Soil Sampling at Air Compressor Bleed-off Valve Discharge
West Valley Business Park
18401 & 18601 72nd Avenue South, Kent, Washington
ATC Associates Inc., May 28, 1997

4. Site discovery and Release Report
West Valley Business Park
Kent, Washington
ATC Associates Inc., October 27, 1998

5. Phase I Environmental Site Assessment and Limited Phase II Activities
West Valley Business Park
18401 72nd Avenue South, Kent, Washington
Versar, Inc. November 24, 1998

6. Independent Remedial Action Report
Contaminated Soil Remediation
West Valley Business Park
18401 72nd Avenue South, Kent, Washington
ATC Associates Inc. February 3, 1999

7. Off-Site Source Determination Review
West Valley Business Park, Kent, Washington
ATC Associates Inc. April 9, 1999

The reports listed above will be kept in the Central Files of the Northwest Regional Office (NWRO) of Ecology for review by appointment only. Appointments can be made by calling Central Records at the NWRO at (425) 649-7190 or -7239.

Based upon the information in the reports listed above, Ecology has determined that, at this time, the release of petroleum hydrocarbons into the soil no longer poses a threat to human health or the environment. However, Ecology has identified concerns that must be addressed prior to issuance of a "no further action" determination for the groundwater portion of this site. Specifically, groundwater samples presented in the October 27, 1998 report by ATC Associates Inc. and the November 24, 1998 report by Versar indicates cis-1,2 dichloroethene is present at concentrations that exceed the MTCA Method-B cleanup standard for groundwater. Further investigation, remedial action and/or monitoring may be required to address this issue.

Therefore, Ecology is issuing this determination that no further remedial action is necessary only for the soil portion of this site under MTCA, chapter 70.105D RCW. Please note that because your actions were not conducted under a consent decree with Ecology, this letter is written pursuant to RCW 70.105D.030(1)(i) and does not constitute a settlement by the state under RCW 70.105D.040(4) and is not binding on Ecology.

Ecology's no further action determination is made only with respect to the release identified in the reports listed above. This no further action determination applies only to the soil area of the property affected by the release identified in the reports at 18401 & 18601 72nd Avenue South, Kent, Washington. It does not apply to any other release or potential release at the property, any other areas on the property, nor any other properties owned or operated by AMB Property L.P.

Ecology will update its database to reflect this "No Further Action" determination for the soil portion of the site. A "further Action" determination will be [illegible]

Suspected Contaminated Sites Report.

The state, Ecology, and its officers and employees are immune from all liability and no cause of action of any nature may arise from any act or omission in providing this determination.

Again, thank you for taking the initiative to voluntarily address the contamination at your site. Your efforts are recognized by Ecology as a positive step in our work to protect human health and the environment in Washington State.

If you would like additional consultation on how to proceed, please feel free to contact me at (425) 649 7265.

Sincerely,

Brian S. Sato
Toxics Cleanup Program

BSS/bs

cc: Neil R. Gilham, ATC Associates Inc.

ATC ASSOCIATES INC.

6347 Seaview Avenue North
Seattle, Washington 98
www.atc-enviro.c
206.781.14
Fax 206.781.15

August 17, 2000

Mr. Steve Campbell
AMB Property, L. P.
505 Montgomery Street, 5th Floor
San Francisco, California 94111

Re: Groundwater Sampling and Washington State Department of Ecology File Review (Reference Previous Field Activity Report, "Monitoring Well Installation and Groundwater Sampling Survey, May 2000")

Dear Mr. Campbell:

This letter transmits the results of ATC Associates, Inc. (ATC) groundwater sampling results conducted on June 21, 2000 and review of Washington State Department of Ecology (Ecology) files. The subject property ("Site") is located at 18401 & 18601 72nd Avenue South, Kent, Washington (Figure 1).

ATC conducted groundwater sampling and Ecology file review according to the request of Scott Allin with Versar, Inc. The purpose of conducting the sampling event at the Site was to determine the groundwater gradient and evaluate trends in Vinyl Chloride concentrations in the groundwater. The file review was completed to evaluate potential sources of on-site vinyl chloride contamination from off-site facilities located within the vicinity of the Site.

It is ATC's understanding that Versar, Inc. has the regulatory documents or prior reports related to the adjacent upgradient property known as CAM Properties and therefore, ATC did not conduct a review of those documents. CAM Properties, listed as Seaport Fabrication on the Washington State Department of Ecology's Confirmed and Suspected Contaminated Sites Report dated May 2000 is located hydraulically upgradient and adjoining the Site. Onsite activities include painting, coating and storage of hazardous substances and wastes.

Groundwater Sampling:

Based on groundwater level measurements taken on June 21, 2000, groundwater flow was toward the West and Southwest, which is generally consistent with previous observations. The monitoring well elevations were surveyed by Michael Hotes of Barghausen Consulting Engineers, Inc. (see Site Map, Figure 2) in May 2000.

On June 21, 2000, ATC collected groundwater samples from the three (3) on-site monitoring wells (MW-1, MW-2 and MW-3). EPA prescribed method protocols regarding sample collection, cross contamination prevention, sample preservation, sample container type, sample holding temperature, and holding times were followed. Samples were collected and placed into laboratory prepared sample vials and placed into a cooler to keep the temperature below 40 degrees Fahrenheit. Each sample cooler was chain-of-custody sealed and a chain-of-custody form was completed in triplicate and placed in the cooler prior to sealing and shipment. The groundwater samples were transported to the laboratory for volatile organic compound (VOCs) analysis (EPA Method 8260).

Vinyl chloride was detected in groundwater sample MW-2 at a concentration of 24 micrograms per liter (ug/L). This concentration exceeds the MTCA Method A cleanup level of 0.2 ug/L for vinyl chloride in groundwater. No other VOCs were detected in MW-2. No VOCs were detected in the MW-1 or MW-3 groundwater samples.

The detected concentration of vinyl chloride in MW-2 was less than the concentration detected during the previous sampling event conducted in May 2000 (150 ug/L vinyl chloride). Laboratory reports are provided in Attachment A.

Ecology File Review:

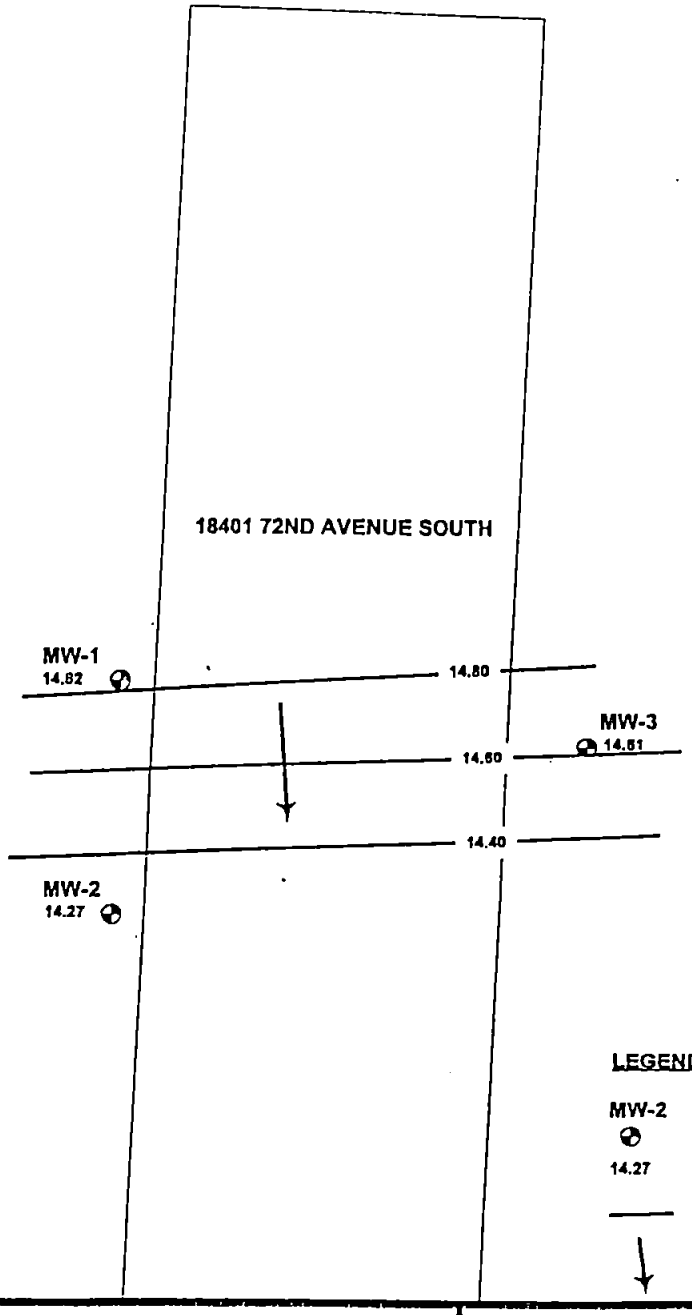
ATC completed an Ecology file review, which included federal and state regulatory records. The file review included properties, which may be suspect as source contributors to on-site migration of vinyl chloride. Files were pulled from properties that have known or suspected VOC contamination from the USEPA National Priority List (NPL), the Comprehensive Environmental Response, Compensation and Liability Information Systems (CERCLIS) and the WADOE Confirmed & Suspected Contaminated Sites Report. Attachment B presents the Ecology files.
The following properties were reviewed:

1. **Hydraulic Repair and Design, Inc.**
   6942 South 196th Street
   Kent, WA

2. **LIDCO**
   7113 South 196th Street
   Kent, WA

3. **Chemcentral**
   7601 South 190th Street
   Kent, WA

4. **Standard Equipment and Western Processing**
   7215 S. 196th Street
   Kent, WA



LEGEND:

MW-2 = APPROXIMATE MONITORING WELL LOCATION

14.27 = GROUNDWATER ELEVATION (6/21/00)

——— = GROUNDWATER CONTOUR

↓ = INFERRED GROUNDWATER FLOW DIRECTION

VATC ASSOCIATES INC.
Solutions for Environmental Concerns

PROPOSAL NO.: 76.18118.0102		
DESIGNED BY: CV	SCALE: 1"=65'	
DRAWN BY: DFK	DATE: 7/13/00	FILE: WVBPFig2.VSD

FIGURE 2. GROUNDWATER CONTOURS

MONITORING WELL INSTALLATION AND GROUNDWATER SAMPLING SURVEY
WEST VALLEY BUSINESS PARK
18401 - 18601 72nd AVENUE SOUTH
KENT, WASHINGTON

West Valley Bus Park. 9/26/00 lbs

ton Joe Hickey

- Call Steve Cambell - Tell him Ecology can not release him of liability due to 3rd party liability. (contamination)
- Ecology will review info to determine if another site should be listed.
- Steve has to resolve his own 3rd party liability issues.
  - neighborly agreement
  - legal measures.
- Pass on to II group. Gail C.

9/27/00 - Steve Campbell - AMB

Left message - Ecology can not release liability - only through a court of law can this be done.

- Try contacting neighbor and compel them to take action or pursue legal action.

Groundwater Sampling Due 2000 & DOE File Review - by ATR Aug 17, 2000

→ lab detection limits are too high for method Vinyl chloride detection limit = 5 ppm vs Method A = 0.2 ppb.

→ AMB cover letter (Sept. 18, 2000) States suspected source may not be identified by Ecology but report States Suspected some is CAM Properties, listed as Seaport Fabrication" on Ecologys Confirmed & Suspected Contaminated Sites list. ??

→ No info on May 2000 sampling event

APPENDIX G

AHERA Certification Documents

Certificate of Training

J&J Associates is pleased to certify that

Don W. Spencer

has attended and successfully completed the

AHERA Building Management Planner Refresher

in accordance with
40 CFR Part 763, Subpart E, Appendix C
on this 30th day of September 2002
at Bellevue, Washington

Valid through September 30, 2003

John G Luter Jr.
COURSE INSTRUCTOR

John G Luter Jr.
TRAINING DIRECTOR

J&J020930-MPR-01
ACCREDITATION NO.

J&J Associates
550 NW Fairwood Way
Bremerton, Washington 98311
(360) 692-5925

LITHO IN U.S.A.

Certificate of Training

J&J Associates is pleased to certify that

Don W. Spencer

has attended and successfully completed the

AHERA BUILDING INSPECTOR REFRESHER

in accordance with
40 CFR Part 763, Subpart E, Appendix C
on this 30th day of September 2002
at Bellevue, Washington

Valid through September 30, 2003

John G Lester Jr.
COURSE INSTRUCTOR

John G Lester Jr.
TRAINING DIRECTOR

J&J020930-BIR-04
ACCREDITATION NO.

J&J ASSOCIATES
550 NW Fairwood Way
Bremerton, Washington 98311
(360) 692-5925

LITHO IN U.S.A.

Certificate of Training

J&J Associates is pleased to certify that

Chris Cass

has attended and successfully completed the

AHERA Building Inspector Refresher

in accordance with
40 CFR Part 763, Subpart E, Appendix C
on this 30th day of September 2002
at Bellevue, Washington

Valid through September 30, 2003

John G Lester Jr.

COURSE INSTRUCTOR

John G Lester Jr.

TRAINING DIRECTOR

J&J020930-BIR-07

ACCREDITATION NO.

J&J Associates
550 NW Fairwood Way
Bremerton, Washington 98311
(360) 692-5925

LITHO IN U.S.A.

APPENDIX H

EPA PCB Guidance Document

United States
Environmental Protection
Agency

Region 10
1200 Sixth Avenue
Seattle WA 98101

Air & Toxics Division

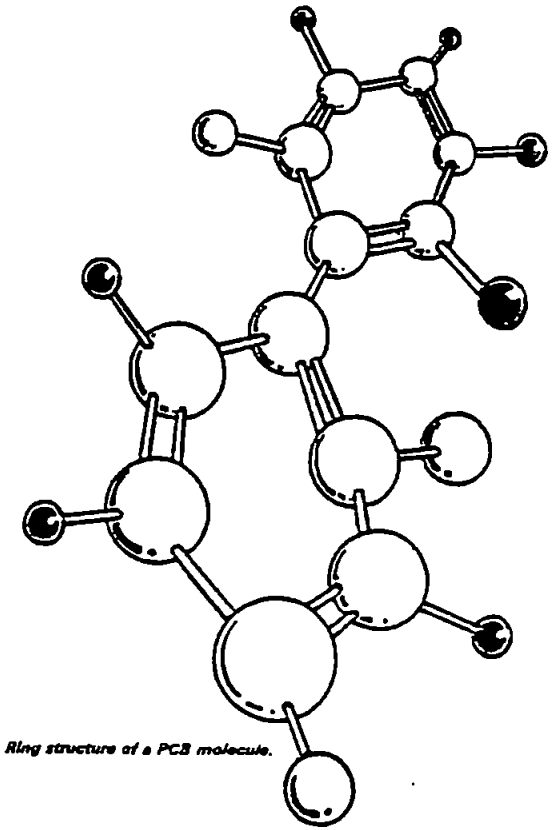
EPA

PCBs in Fluorescent Light Fixtures

A Fact Sheet

Introduction

The purpose of this brochure is to provide some basic information on polychlorinated biphenyls (PCBs) and guidelines for handling PCBs in fluorescent light fixtures. Although the precautionary actions described in this fact sheet may seem extreme, or suggest to some that cleanup of a small PCB spill is personally hazardous, this is not generally so. For example, if you should get a small amount of PCB on your skin during cleanup, it is highly unlikely that you would be harmed. However, given the nature of PCBs and the fact that much is still unknown about the effects of minor exposures, no absolute guarantees or reassurances can be given. For that reason, EPA has chosen to describe a conservative approach which minimizes personal hazard. It is EPA's hope that this information will inform you rather than alarm you.



Ring structure of a PCB molecule.

What Are PCBs?

PCBs (polychlorinated biphenyls) belong to a broad family of organic chemicals known as chlorinated hydrocarbons. PCBs are produced by the combination of one or more chlorine atoms and a biphenyl molecule. Virtually all PCBs in existence today have been synthetically manufactured.

PCBs range in consistency from heavy oily liquids to waxy solids. Prior to 1979, PCBs were widely used in electrical equipment such as transformers, capacitors, switches, and voltage regulators for their "cooling" properties because they do not readily burn or conduct electricity, and only boil at high temperature. Also, PCBs do not readily react with other chemicals. They were also used in mining equipment, heat transfer and hydraulic systems, carbonless copy paper, pigments, and microscopy mounting media.

Why Are PCBs Harmful to Human Health and the Environment?

When released into the environment, PCBs do not easily break apart and form new chemical arrangements (i.e., they are *not* readily biodegradable). Instead, they persist for many years, bioaccumulate, and bioconcentrate in organisms. Laboratory data show that PCBs cause cancer in animals. Although there are no actual data showing that PCBs cause cancer in humans, EPA's policy is to consider any animal carcinogen a possible human carcinogen. Animal studies show adverse reproductive and developmental effects from repeated exposure to PCBs. In addition, it has been shown that PCBs are toxic to fish at very low levels of exposure. The survival rate and the reproductive success of fish can be adversely affected by the presence of PCBs. EPA believes there may be similar cause for concern when humans are exposed to large doses of PCBs. Exposure to PCBs can cause chloracne (a painful, disfiguring skin illness), nausea, dizziness, eye irritation, and bronchitis. Ingestion of PCBs can cause liver damage and digestive problems.

How Does EPA Regulate PCBs?

EPA regulates PCBs through rules issued pursuant to the Toxic Substances Control Act of 1976. These regulations generally control the use, marking, storage, records, and disposal of PCBs. There are millions of pieces of equipment in operation in the U.S. which were manufactured prior to these regulations and which contain PCBs.

Small Capacitors in Fluorescent Light Ballasts

Light ballasts are the primary electric components of fluorescent light fixtures and are generally located within the fixture under a metal cover plate. The ballast units are generally composed of a transformer to reduce the incoming voltage, a small capacitor (which may contain PCBs), and possibly a thermal cut-off switch and/or safety fuse. These components are surrounded by a tar-like substance that is designed to muffle the noise that is inherent in the operation of the ballast. This substance covers the small capacitor. When a ballast unit fails, excessive heat can be generated which will melt or burn the tar material, creating a characteristic foul odor.

In considering causes of ballast failure, some privately conducted tests have indicated that operation of power-saving lamps with a standard ballast or standard lamps with a power-saving ballast tends to significantly increase the ballast operating temperature and decrease its normal life-span. It appears that ballasts will fail less frequently if standard

This is the ballast portion of a typical fluorescent light fixture.

saving lamps with power-saving ballasts. Fluorescent lamps should be changed in pairs; new lamps should not be used with old lamps.

Does Your Fluorescent Light Ballast Contain PCBs?

Before EPA banned the manufacture of PCBs in 1978, PCBs were used in the manufacture of fluorescent light ballasts. The use of PCBs in ballasts manufactured prior to 1978 is not regulated by EPA. All light ballasts manufactured since 1978 which do not contain PCBs should be marked by the manufacturer with the statement *"No PCBs."* For those manufactured prior to that time, or for those ballasts which contain no statement regarding PCB content, you should assume that they do contain PCBs.

If the ballast does contain PCBs, they are located inside the small capacitor. There would be approximately 1 to 1½ ounces of PCB fluid in the capacitor itself. If the ballast fails, the capacitor *may* break open, allowing the PCB oil to drip out of the fixture. The capacitor does not always leak when the ballast fails, but when it does happen, measures should be taken to limit or avoid personal exposure.

What Should I Do if My Light Ballast Leaks?

EPA has these recommendations for anyone with a fluorescent light ballast leaking PCBs:

1. Vacate the room or area immediately and open any windows to ventilate the room to the outside. If the incident occurred in a room which cannot be vented, the person replacing the failed ballast and cleaning up can reduce exposure by wearing a chemical cartridge respirator equipped with an organic vapor cartridge.

Once you have removed the fluorescent tubes and the central cover, you will be able to easily locate the ballast(s). Note the gloves and goggles worn to prevent possible personal contact with PCBs.

2. Turn off the light fixture at the switch and disconnect electricity at the fuse or breaker box. Let the ballast unit cool for 20-30 minutes before proceeding.

   If the room is fully ventilated, the amount of PCB-contaminated particulate matter in the air should decrease significantly enough to make negligible any risk from breathing.

3. Wear rubber gloves that will not absorb PCBs (e.g., neoprene, butyl, or nitrile). Further, if you will be working directly under the fixture, consider using additional protective gear such as goggles (or a face shield) and a rubber apron to help avoid possible exposure from further leaking or cleanup activities. Exercise caution to avoid personal contamination (e.g., from touching your face with a contaminated glove).

   During the cleanup or removal period, smoking should be prohibited in the area because smoking increases the inhalation rate of contaminated air. In addition, you may be using a flammable solvent in the cleanup.

4. Remove the fluorescent lamps.

5. Recheck that the power is off at the fuse or breaker box. Remove the metal cover over the wiring and ballast unit; loosen the ballast unit by taking out the metal screws which hold it to the end of the fixture; cut the electrical wires going to the ballast and remove the ballast. *Note: Wire connectors can be used when installing a new ballast.*

6. Proceed to clean up leaks using the following guidelines.

   PCBs that leak onto *nonabsorbent* surfaces such as table tops and uncarpeted floors should first be cleaned up by wiping with a rag or paper towel or by scraping with a putty knife if hardened. Avoid smearing the PCB around. This would only contaminate a larger area. Surfaces should then be thoroughly cleaned twice using an appropriate solvent or detergent. Only certain solvents are effective in cleaning up spilled PCBs. These include *mineral spirits, deodorized kerosene, turpentine,* and *rubbing alcohol.* Certain detergents containing trisodium phosphate (such as *"Soilax"* or *"Spic 'n Span"*) may also be used. However, they should be used only at *full strength* and applied with a damp rag rather than diluted in a bucket. That solution would become contaminated and cannot legally be disposed of in the sewer system. Some of the other effective detergent products (which are commercially available) include: *"Triton X-100"* (Rohm-Haas), *"Sterox"* (Monsanto), and *"Power Cleaner 155"* (Penetone Corp.). EPA does not endorse these particular products. Other effective products may also be available.

   For leaks onto *absorbent* materials such as drapes and carpets, there is no reliable way to clean and decontaminate the material. In the case of rugs and fabrics, the material should be cut away in a six-inch radius around the contamination point(s). In areas where foot traffic has spread contamination, the entire carpet should be

disposed of. Proper disposal procedures for all such materials are described in the following section. Associated surfaces, such as flooring under contaminated carpeting, should be thoroughly cleaned with a solvent or detergent as previously described.

7. Contaminated materials (*ballasts, rags, contaminated clothing, gloves, drapes, carpets, etc.*) should be packed into crumpled newspapers or other sorbent materials (*sawdust, kitty litter, vermiculite, soil, etc.*) and placed in a double thickness plastic bag. This bag should be taken to one of the transporters listed in the following section of this fact sheet. There, the contaminated materials will be packed in a drum approved for PCBs by the Department of Transportation and finally disposed of at an EPA approved site.

   (One might consider discarding the entire light fixture instead of decontaminating the unit. This would eliminate the chance of skin coming into direct contact with the PCBs while cleaning inside the light fixture.)

8. When you are completely through with the cleanup process, and contaminated materials and protective clothing have been packed for disposal, you should wash your hands thoroughly with detergent.

9. Continue to ventilate the room for 24 hours before reuse.

How to Get Rid of Your PCBs

Arrangements may be made with one of the following Seattle area transporters for shipment of ballasts, PCB-soiled items, or fluorescent fixtures containing PCBs to an EPA-approved chemical waste processing site. You may wish to call more than one transporter to compare prices. If you live outside of the Seattle metropolitan area, please check the telephone yellow pages under waste disposal to locate an authorized transporter. If you have difficulty finding a transporter, please call EPA's regional office in Seattle at (206) 442-1270.

1. Chemical Processors, Inc.
   (206) 767-0350
2. Northwest Tank Service
   (206) 622-1090
3. Crosby and Overton
   (206) 872-8030 (24-hour number)
4. Westinghouse
   (206) 292-4111

For homeowners within the Seattle metropolitan area, small numbers (less than 5) of non-leaking fluorescent light ballasts can be dropped off at one of four collection points maintained by the Seattle-King County Health Department. Appointments must be made beforehand. ***Leaking units will not be accepted.*** The numbers to call for these centers are:

Eastside (Bellevue area)	885-1278
Southeast (Renton area)	228-2820
North (Northgate area)	363-4766
Central (downtown area)	587-2722

The Seattle-King County Health Department will make arrangements to have the ballasts collected at these centers shipped to an EPA-approved chemical waste landfill for PCBs.

For further information, please contact EPA Region 10 at (206) 442-1270.

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