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December 2, 1999

ADaPT Job Nos. WA99-3021 & WA99-3021-1

**Guaranty Mortgage and
Empire Enterprises, Inc.**

4200 – 196th Street Southwest
Suite 200
Lynnwood, Washington 98037

Attention: Mr. Gary Hopkins and Mr. Young Shin

Subject: Phase I Environmental Site Assessment and
Limited Soil Vapor Sampling & Testing
4th Avenue Retail Center
12720 – 4th Avenue West
Everett, Washington

Gentlemen:

ADaPT Engineering, Inc. (ADaPT) is pleased to present the results of our Phase I Environmental Site Assessment and Limited Soil Vapor Sampling & Testing for the above-referenced property. The Phase I assessment was performed in general accordance with ASTM Practice E 1527-97.

ADaPT appreciates the opportunity to be of service to you on this project. Should you have any questions concerning this report, or if we can assist you in any way, please feel free to contact us at (206) 654-7045.

Respectfully Submitted,

ADaPT Engineering, Inc.

Adam E. Escalona
Senior Project Manager

AEE/aee

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- Figure 1 Location/Topographic Map
- Figure 2 Parcel Map
- Figure 3 Vicinity Map
- Figure 4 Site Plan
- Figure 5 Sample Location Plan

- Appendix A Laboratory Certification

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1.0 EXECUTIVE SUMMARY

ADaPT is pleased to present the results of the Phase I Environmental Site Assessment (Phase I) for the subject site located at 12720 – 4th Avenue West in unincorporated Snohomish County, Washington.

Site Description: The subject site is rectangular shaped and covers a reported 1.65 acres. The site is developed with a one-story strip mall. The building is roughly L-shaped with the inside-corner facing northwest. According to tax assessment records, the masonry building has 14,336 square feet, and was constructed in 1984. Two of the eight tenants include a dry cleaners (Lisa's Custom Dry Cleaners), and a 7-Eleven that retails gasoline (see Section 3.0).

Site History: Historical research (see Section 6.0) revealed that the site was undeveloped from at least 1947 until 1984 when the current strip mall was constructed. A dry cleaners has occupied the site since the building was opened. The dry cleaners is currently in Suite E, but previously was located in the adjacent Suite F. Based on anecdotal information from the site property management company, and the current owner of the dry cleaners, prior to 1994 the dry cleaners was a "drop shop" where cleaning was conducted at an off-site location.

There is a data failure in that historical information specifically dated prior to 1940 was not found by ADaPT. Considering, however, the undeveloped, tree-covered appearance of the site in a 1947 aerial photograph, it appears likely the site was undeveloped prior to 1940.

Regulatory Agency Information: A review of regulatory agency lists and databases (see Section 8.0) revealed the site to have registered underground storage tanks (USTs) associated with the 7-Eleven. A pump island and three USTs are situated southeast of the site building. The USTs are aligned side-by-side, with the ends oriented roughly in a northwest-southeast direction. Reportedly, the USTs were installed in 1984, are 10,000 to 19,999 gallons, and contain gasoline. The review of a Washington Department of Ecology (Ecology) file indicated the USTs and the associated piping are of fiberglass reinforced plastic construction. Further, notations in the Ecology file state that compliance tags were issued for the USTs on February 16, 1999, indicating the USTs and piping meet current Washington UST regulation requirements. Finally, the Ecology file contains passing results of tightness tests for the USTs from 1993, 1996, 1997, and 1998. The site does not appear on the Ecology's listing of leaking USTs.

The regulatory agency lists and databases review additionally revealed the presence of a number of sites in the subject area with reported environmental concerns. These sites appear to be situated in positions that are inferred to be hydrologically non-tributary to the subject site, based on the topography. Considering this, it is unlikely the reported contamination at these sites would migrate to the subject site.

Site Reconnaissance: Excluding the dry cleaners and the USTs, the site reconnaissance (see Section 7.1) did not reveal readily apparent indications of the following recognized environmental conditions: above ground storage tanks containing hazardous substances; lagoons; landfills; pipelines; hazardous materials and hazardous waste storage/disposal areas including sumps, pits, ponds, drums; dead and chemically stressed vegetation; discarded electrical transformers and capacitors; groundwater monitoring wells; obvious locations of past and present chemical disposal.

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Limited Visual Asbestos Survey: A limited visual survey for asbestos-containing building materials (ACBMs) revealed the presence of suspect asbestos-containing gypsum wallboard; several types of suspended "T-grid" ceiling panels; several types of sheet vinyl flooring and 12-inch floor tile; cove base; and carpet mastic. Although the roof was not accessed, it is flat and likely is covered with an asphalt composite, which is considered a suspect ACBM. The observed suspect ACBMs were in good condition and there is no regulatory need to remove them at this time (see Section 9.0).

Limited Soil Vapor Sampling & Testing: To assess whether there has been a release of the common dry cleaning solvent perchloroethylene (PCE) at the site, ADaPT conducted a soil gas survey in Suite E where the current dry cleaners is situated. Four soil vapor samples were collected from Suite E on November 18, 1999. Three samples were collected from immediately to the west, south, and east of the dry cleaning machine, and a fourth sample was collected from near a floor drain in the boiler room. Concentrations of PCE were detected in all four samples including 85.3 parts per billion (ppb), 36.6 ppb, and 72.1 ppb near the dry cleaning machine, and 12.6 ppb near the floor drain. Parts per billion is a rough approximation of micrograms per liter ($\mu\text{g/L}$) of air.

Conclusions: The Phase I revealed the presence of recognized environmental conditions (as defined by ASTM Practice E1527-97) associated with the subject site including an on-site dry cleaners where there has been an apparent PCE release (based on Limited Soil Vapor Sampling & Testing). In ADaPT's professional opinion, further assessment of the apparent PCE release is warranted.

The three on-site USTs are an environmental concern because of the potential for leaks and spills. The USTs and their piping, however, reportedly are in compliance with the Washington UST regulations. Further, the USTs and piping have passed tightness testing since 1993. While ADaPT found no information that there has been a release associated with the USTs, they may be considered a potential source of a release.

Suspect ACBMs associated with the site building were observed to be in a good condition. Considering the 1984 construction date of the site building, it is less likely the observed suspect ACBMs contain asbestos. This is because the manufacturing of ACBMs was halted in 1980. Currently, there is no regulatory need for a more thorough sampling survey to be performed, unless renovation or demolition activities are anticipated.

The Executive Summary is intended for introductory purposes only and should be used in conjunction with the full text of this report.

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2.0 INTRODUCTION

2.1 Purpose

The purpose of the Phase I is to evaluate the subject site for indications of recognized environmental conditions due to previous or ongoing, on-site and off-site activities or conditions. Where applicable, the Phase I also strives to satisfy one of the requirements to qualify for the *innocent purchaser/landowner defense* to Comprehensive Environmental Response, Compensation and Liability Act, 42, U.S.C. 9601, et seq. (CERCLA) liability. The Phase I endeavors to provide “*all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice in an effort to minimize liability*” as stated in CERCLA and MTCA.

2.2 Special Terms and Conditions

Authorization to perform the Phase I was given with the acceptance of ADaPT Proposal P-1530, signed by Mr. Gary Hopkins of Guaranty Mortgage on November 11, 1999.

2.3 Scope of Work

The scope of work for the Phase I consisted of gathering reasonably ascertainable information in general accordance with the American Society for Testing and Materials (ASTM) Standard Practice for Phase I Environmental Site Assessments (ASTM Practice E 1527-97). Specifically, this Phase I consisted of the following:

- A reconnaissance to assess the subject site and the parcels immediately surrounding the subject site for recognized environmental conditions.
- A review of regulatory agency (U.S. Environmental Protection Agency, Washington State Department of Ecology, etc.) database lists, and individual site files, if necessary, to evaluate reported environmental concerns near the subject site.
- A survey of available local geologic and topographic maps, as well as additional information concerning public and private water sources in the project vicinity.
- A review of historical sources including available business directories, aerial photographs, maps, tax assessment records, and building/planning department records. The historical information was used to evaluate past and present land use at the subject site and immediate surrounding area to document businesses, activities, or conditions that could possibly compromise the environmental integrity of the subject site.
- A visual survey for suspect asbestos-containing building materials (ACBMs) for the site building to make the client aware of the presence of building materials that may contain asbestos. The visual ACBM survey does not satisfy the "Good Faith Inspection" requirements specified in Chapter 296-62-07721 Washington Administrative Code (WAC), and other federal, state, and local regulations for buildings that are to be renovated or demolished.

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- Preparation of a report documenting the findings of the Phase I and our opinion of the possibility that contamination of the subject site may exist due to on-site or nearby off-site land use activities.

ADaPT additionally conducted Limited Soil Vapor Sampling & Testing in Suite E of the site building to assess for the presence of PCE beneath the concrete slab.

2.4 Limitations

This assessment is intended to provide the client with information regarding apparent suspicions of existing and potential recognized environmental conditions associated with the subject property. ADaPT warrants that this Phase I Environmental Site Assessment was performed using generally accepted, good commercial and customary environmental assessment practices. ADaPT believes that the information obtained from the records review and the interviews concerning the site is reliable. However, ADaPT cannot and does not warrant or guarantee that the information provided by these other sources is accurate or complete. No other warranty, either implied or express is given.

Environmental impairment of property because of activities such as illicit or unreported dumping or spilling of hazardous or deleterious materials may not be readily apparent. The opinions and conclusions presented in this report are based on information readily available at the time of the assessment. The collection of quantitative information, such as data generated by the analysis of soil or water samples, was beyond the scope of this assessment. The Phase I does not address the ASTM Phase I non-scope issues of radon, lead-based paint, lead in drinking water, and wetlands. Other project specific limitations are presented in the appropriate sections of this report.

This report has been prepared for the exclusive use of Guaranty Mortgage, Empire Enterprises, Inc. (Mr. Young Shin), and their agents for specific application to the project site. Use or reliance upon this report by a third party is at their own risk. ADaPT does not make any representation or warranty, express or implied, to such other parties as to the accuracy or completeness of this report or the suitability of its use by such other parties for any purpose whatever, known or unknown, to ADaPT.

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3.0 SITE DESCRIPTION

A Location/Topographic Map (Figure 1), Parcel Map (Figure 2), Vicinity Map (Figure 3), and Site Plan (Figure 4) are attached at the end of the report.

3.1 Location

The subject site is located at 12720 – 4th Avenue West in unincorporated portion of Snohomish County, Washington south of Everett (Section 25, Township 28 North, Range 4 East, W.M.).

3.2 Site and Vicinity Characteristics

The subject site is rectangular shaped and covers a reported 1.65 acres. The site is developed with a one-story strip mall. The site is owned by Mr. Jong C. Lee, and managed by Management Northwest, Inc.

According to the United States Geological Survey (USGS) 7.5-minute series topographic map "Everett" (1953, revised 1973), the site is at an elevation of approximately 575 feet above mean sea level. Topographically, the site has a slight downslope from west to east, there being an estimated three-foot difference in elevation between the west and east sides of the site. The surface of the site is covered with the site building, asphalt and concrete paving, and landscape areas.

The site is bordered on the north by a fire lane, beyond which is a condominium complex (4th Avenue Village); on the east by 4th Avenue West, beyond which are the Mariner Square shopping plaza, and a Mitzel's restaurant; on the south by Southeast 128th Street, beyond which is the Puget Park retail center; and on the west by a fire lane, beyond which is a Pizza Hut and a vacant lot.

3.3 Description of Improvements

The site is occupied by a one-story retail strip mall. The building is roughly L-shaped with the inside-corner facing northwest. According to tax assessment records, the masonry building has 14,336 square feet, and was constructed in 1984. The building has roof-mounted heat pumps that appear to be fueled by natural gas. The building has eleven suites and eight tenants. The tenants include: Teriyaki Plus – Suite A; Big Wheel Auto Parts – Suites B and C; My Kitchen (caterer) – Suite D; Lisa's Custom Dry Cleaners – Suite E; One Hour Photo – Suite F; 7-Eleven – Suite G; Alfy's Pizza – Suites H and I; and Pandora's Books – Suites J and K.

In addition to the building, the site has a canopy, pump island, and underground storage tanks (USTs) associated with the 7-Eleven. The fueling facility is southeast of the building.

Utilities at the site consist of water and sanitary sewer (Alderwood Water District), electricity (Snohomish County Public Utility District No. 1), and telephone (GTE Northwest).

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4.0 INTERVIEWS, REPORTS, AND ENVIRONMENTAL LIENS

Persons who may have information concerning environmental conditions at and surrounding the subject site were interviewed. Pertinent information obtained during the interviews appears below, and in the appropriate sections of this report.

Previous environmental reports for the site, if they exist, were not located and reviewed by ADaPT.

5.0 PHYSICAL SETTING

5.1 Regional Physiographic Conditions

The host parcel is situated on a rolling upland, glacial till plain. The host parcel appears to lie within the drainage of North Creek, which flows due south approximately three-quarters mile to the east. Stickney Lake is situated approximately one mile southwest of the site.

5.2 Geologic and Soil Conditions

According to the USGS "Geologic Map of the Everett 7.5-Minute Quadrangle, Snohomish County, Washington" (James P. Minard, 1985), the geologic unit underlying the host parcel is glacial till. The map describes glacial till as follows:

"These deposits mantle hills, ridges, and slopes. The till (locally referred to as Vashon till) is a nonsorted mixture of mud, sand, pebbles, cobbles and boulders (diamicton); it resembles concrete mix. The till contains some lenses of stratified material, particularly in its lower part. It is compact to locally cemented lodgement till, commonly called hardpan. The till has a sheeting or fissility near and parallel to the surface and tends to spall and crumble where exposed. It is varied in clast composition and is similar to the recessional outwash. Outcrops of till are from 3 to 20 m thick in the quadrangle. The till was deposited directly by the ice as it advanced over bedrock and older Quaternary sediments. Its compactness partly results from the weight of the ice, which was hundreds of meters thick when it overrode the till. Drainage is good in the uppermost 1 to 2 m of loose, weathered material, but water ponds and moves laterally along the buried hardpan surface. The till lies unconformably on or against older underlying deposits."

The United States Department of Agriculture Soil Conservation Service's *Soil Survey of Snohomish County Area, Washington* (Alfonso Debose and Michael W. Klungland. Pringle, 1983) was consulted for information relating to soils underlying the subject site. The survey indicates the soil unit underlying the host parcel is McKenna gravelly silt loam, 0 to 8 percent slopes, which the survey describes as follows:

"This moderately deep, poorly drained soil is in depressional areas and drainageways on till plains. It formed in glacial till..."

"Typically, the surface layer is very dark grayish brown gravelly silt loam about 8 inches thick. The subsoil is brown and light olive brown gravelly silt loam about 25 inches thick. Olive, compact glacial till is at a depth of 33 inches. Depth to glacial till ranges from 20 to 40 inches..."

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“Permeability of this McKenna soil is slow. Available water capacity is moderate... Runoff is slow, and the hazard of erosion is slight. A seasonal perched water table is at a depth of 0 to 6 inches. Ponding occurs from November to April...”

5.3 Groundwater Conditions

Near-surface or perched groundwater typically occurs when an underlying soil layer of less permeability prevents the downward percolation of water. Water will build up above the less permeable soil, and move laterally in the more permeable overlying soils. Wet or saturated soils may also be encountered at depth due to cleaner sand and gravel zones. Groundwater conditions should be expected to fluctuate due to season, amount of precipitation, and other on-site and off-site factors. Considering the reported presence of glacial till in the subject area, near-surface groundwater is expected to be present within 30 feet of the ground surface.

Although groundwater flow direction is difficult to predict without the installation of at least three monitoring wells that measure water levels over time, an estimate of possible near-surface groundwater flow direction is provided to help evaluate potential on-site and off-site contaminant impacts. Groundwater flow direction is the path along which dissolved contaminants might migrate if present in groundwater supplies. Typically, in this region, the near-surface groundwater flow direction generally follows topography. The subject area slopes down to the east, and so near-surface groundwater flow direction likely follows the topography and moves toward the east. Variations in the assumed flow direction may exist that would remain uncharacterized without performing a subsurface exploration program with groundwater monitoring wells, which is beyond the Phase I scope of work.

5.4 Drinking Water Supplies and Water Wells

The subject area obtains its public drinking water supply from the Alderwood Water District, which obtains its drinking water supply from the City of Everett. The City of Everett obtains its drinking water supply from Spada Lake in central Snohomish County. Based on the separation distance, it is highly unlikely this drinking water supply would be influenced by the subject site.

6.0 HISTORICAL USE INFORMATION

This section is divided into two subsections. The first subsection (Section 6.1) summarizes the various historical sources that were consulted. The second subsection (Section 6.2) is a discussion of the historical uses of the subject site and immediate surrounding area.

6.1 Historical Sources

The land use history of the subject site and immediate surrounding area was researched utilizing the various reasonably ascertainable sources described below.

Tax Assessment Records

We obtained tax assessment information from the Snohomish County Assessor. The parcel number for the site is 3805-000-001-0000.

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Aerial Photographs

ADaPT reviewed aerial photographs dated 1947, 1955, 1967, 1976, 1981, 1985, 1993, and 1997 at Walker & Associates, Inc. of Tukwila, Washington. The photographs range in scale from 1:1,000 to 1:2,000, and are black and white and color. In the review of the aerial photographs, observations are interpretative and limited to the area within approximately one-quarter-mile of the subject site. The scale of each photograph limited the assessment of some specific site characteristics. However, we were able to discern the absence and presence of structures on the subject site, as well as developmental trends in the immediate subject area.

Historical Maps

We reviewed the USGS 7.5-minute series topographic map "Everett" dated 1953, and photorevised in 1973.

We reviewed the collection of Sanborn Map Company fire insurance maps at Suzallo Library at the University of Washington. Sanborn maps, as they are commonly referred, typically detail building construction type and use, and may show underground and above ground storage tanks, chemical storage areas, and other recognized environmental conditions. The Sanborn Map Company published maps dating from 1867 to the present for various cities and towns, and therefore the maps are a good source for identifying the past uses of a property. The reviewed collection does not have Sanborn maps of the subject site and area.

Business Directories

In an effort to document past occupants of the subject site addresses and immediate surrounding addresses, ADaPT reviewed available historical business directories that include reverse street directories such as those published by R.L. Polk & Company and Cole Publications. These directories are commonly known as Polk and Cole directories. ADaPT reviewed the collection of business directories at the main branch of the Seattle Public Library. A review of the collection revealed one Cole directory (dated 1986) with coverage of the subject area.

ADaPT additionally reviewed the yellow pages of a standard 1985-86 GTE telephone directory for dry cleaners.

6.2 Historical Findings

Following is a decade by decade discussion of the uses of the subject site and immediate surrounding area.

1940s

A 1947 aerial photograph shows the site and surrounding area largely undeveloped and covered with trees. Exceptions are 4th Avenue West immediately to the east of the site, and 128th Street Southwest immediately to the south. Additionally, what appears to be a residence is south of 128th Street Southwest.

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Historical information specifically dated prior to 1940 was not found by ADaPT. Considering, however, the undeveloped, tree-covered appearance of the site in the 1947 aerial photograph, it appears likely the site was undeveloped prior to 1940.

1950s

A 1955 aerial photograph shows the addition of residential-like structures east and west of the site. The site itself remains tree covered.

1960s

A 1967 aerial photograph shows the site and immediate surrounding area developed much as they appear in the 1955 aerial photograph. One exception is the addition of Interstate 5 approximately one-quarter mile east of the site.

1970s

A 1973 photorevised version of the 1953 USGS 7.5-minute topographic map "Everett" depicts the site undeveloped and covered with vegetation. A 1976 aerial photograph shows the residences previously observed to the east, south, and west of the site to no longer be present. The site remains covered with trees.

1980s

A 1981 aerial photograph shows the site undeveloped. North of the site, the current 4th Avenue Village condominiums are present. The other immediate surrounding parcels are undeveloped. A 1985 aerial photograph shows the site developed with the current building, including the pump island canopy. East of the site, beyond 4th Avenue West, the current Mitzel's restaurant is developed. Southeast and south of the site the current Skipper's and Puget Park retail center are present.

Tax assessment records indicate the subject building was constructed in 1984. The yellow pages of a 1985-86 GTE telephone directory lists Alderwood Dry Cleaners at the subject address of 12720 – 4th Avenue West.

1990s

A 1993 aerial photograph shows the addition of the current Pizza Hut immediately to the west of the site. A 1997 aerial photograph shows the site and surrounding area developed much as they currently appear.

A 1986 Cole directory lists the following businesses at the subject address of 12720 – 4th Avenue West: Alderwood Dry Cleaners, Alfy's Pizza, Gone to Maui, Realty World, 7-Eleven, Video Outlet.

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7.0 RESULTS OF RECONNAISSANCE

7.1 On-Site Inspection Observations

An ADaPT representative conducted a reconnaissance of the subject site on November 11 and 16, 1999. The purpose of the site reconnaissance was to evaluate current conditions at the subject site and to look for recognized environmental conditions. The reconnaissance consisted of walking on, and observing the subject site to provide an overlapping field of view.

Dry Cleaners

Suite E is occupied by a dry cleaners. Environmental concerns associated with the dry cleaners are presented in Section 10.0.

Underground Storage Tanks/Fueling Facility

The 7-Eleven retails gasoline. A pump island and three USTs are situated on the southeast portion of the site. The USTs are aligned side-by-side, with the ends oriented roughly in a northwest-southeast direction. Ecology's listing of registered USTs (see Section 8.4) indicates the USTs were installed in 1984, are 10,000 to 19,999 gallons, and contain gasoline. ADaPT reviewed a file concerning the USTs at Ecology's Northwest Regional Office in Bellevue, Washington. Information in the file indicates the USTs are owned and operated by The Southland Corporation. The USTs and the associated piping are of fiberglass reinforced plastic construction. Further, notations in the Ecology file state that compliance tags were issued for the USTs on February 16, 1999, which indicates the USTs and piping meet current Washington UST regulation requirements. Finally, the Ecology file contains passing results of tightness tests for the USTs from 1993, 1996, 1997, and 1998.

Polychlorinated Biphenyls

The site building has fluorescent light fixtures that have associated ballasts. Fluorescent light ballasts manufactured prior to 1979 sometimes contained polychlorinated biphenyl (PCB). Ballast not labeled "No PCBs" should be assumed to contain PCBs. In case of future repair work, remodeling, or demolition of the fluorescent lights, certain regulations concerning the disposal of the ballasts must be followed. EPA Region 10 has established a policy that PCB ballasts must be disposed of in a chemical waste landfill or in a high-temperature incinerator. Considering the 1984 construction date of the site building, it is unlikely the fluorescent light ballasts contain PCBs.

Other Environmental Concerns

The reconnaissance did not reveal readily apparent indications of the following on the subject site: above ground storage tanks containing hazardous substances; lagoons; landfills; pipelines; hazardous materials and hazardous waste storage (excluding the dry cleaners)/disposal areas including sumps, pits, ponds, drums; dead and chemically stressed vegetation; discarded electrical transformers and capacitors; groundwater monitoring wells; obvious locations of past and present chemical disposal.

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7.2 Adjacent Site and Vicinity Observations

A representative of ADaPT conducted a reconnaissance of the area surrounding the subject site on November 11 and 16, 1999. The purpose of this reconnaissance was to observe land use in the subject site vicinity and to evaluate the potential for nearby businesses to generate, use, or store hazardous substances that may affect the subject site. The off-site reconnaissance was non-intrusive with the adjoining properties observed from the subject site and public right-of-ways. ADaPT did not observe readily apparent recognized environmental conditions associated with the adjoining parcels.

8.0 STANDARD REGULATORY AGENCY ENVIRONMENTAL RECORD SOURCES

Publicly available and practically reviewable regulatory agency reports generated from databases were reviewed with respect to the subject site. The reports, obtained from federal, state, and local government agencies, were reviewed in an effort to document any reported environmental concerns that have occurred at the subject site or in the surrounding area. Sites or facilities appearing on the reviewed reports, within a certain search distance of the subject site, are discussed below. The search distances ADaPT utilizes for Phase I reports meet those specified in ASTM Practice E 1527-97. The following reports were reviewed (the search distance for each report is listed in parentheses):

- U.S. Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) report (one-half mile) and sites on the National Priority List (one mile).
- Washington State Department of Ecology's (Ecology) Confirmed and Suspected Contaminated Sites report (one mile).
- The EPA's Resource Conservation and Recovery Act (RCRA) total notifiers report (subject site and adjoining properties), including RCRA Treatment, Storage, and Disposal (TSD) facilities (one-half mile), and TSD facilities subject to Corrective Action (CORRACTS) under RCRA (one mile).
- Ecology's Underground Storage Tank registration list (subject site and adjoining properties).
- Ecology's Leaking Underground Storage Tank list (one-half mile).
- Emergency Response Notification System (ERNS) Spill Report (subject site).
- Landfills (one-half mile).

8.1 NPL and CERCLIS

The EPA uses the CERCLIS database to track activity conducted under the Superfund program. Three types of sites are listed in this database, including sites which may be hazardous and require a preliminary investigation; sites for which no further remedial action is planned (NFA); and sites which represent a long-term threat and are classified on the National Priorities List (NPL). **The reviewed database (dated September 15, 1999) did not indicate the presence of CERCLIS sites located within approximately one-half mile of the subject site, and no presence of NPL sites located within approximately one mile of the subject site.**

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8.2 Confirmed and Suspected Contaminated Sites Report

Ecology's Confirmed and Suspected Contaminated Sites (CSCS) report is an inventory of suspected or confirmed hazardous substance sites in the state of Washington. **A review of the CSCS report (dated May 21, 1999) revealed the presence of two CSCS facilities located within one mile of the subject site.** The facilities are listed below, along with their approximate distances and directions from the subject site:

1. PALLISTER PAINT at 1037 CENTER RD..... 0.75 mile northwest
2. MCCOLLUM PARK at 128TH ST SE & 4TH DR SE 0.5 to 0.75 mile east-southeast

The two CSCS facilities are situated in positions that appear to be hydrologically non-tributary to the subject site, based on the topography, and thus it is unlikely the reported contamination at these facilities would migrate to the subject site.

8.3 RCRA Total Notifiers, TSD, and CORRACTS TSD

The RCRA total notifiers report is a list of regulated generators, handlers, transporters, and disposers of hazardous materials. Listing on the RCRA report does not indicate a facility has been adversely affected by a hazardous material, but merely that the facility is required to monitor and document hazardous waste activities to the EPA or Ecology. **The reviewed RCRA report (dated October 26, 1999) does not list a RCRA facility on or adjoining the subject site. The reviewed RCRA total notifiers report does not include TSD facilities located within one-half mile of the site. The CORRACTS report (dated October 26, 1999) does not list a CORRACTS facility situated within one mile of the site.**

8.4 Underground Storage Tanks

Ecology's report of USTs (dated November 1, 1999) includes USTs that have been registered with state of Washington, in accordance with the Washington UST Regulations (Chapter 173-360 WAC). **The reviewed report includes the subject site, but no adjoining sites.** The subject site is listed as 7-ELEVEN FOOD STORE 2306-25331-J at 12720 4TH AVE W. The subject site USTs are discussed in Section 7.1.

8.5 Leaking Underground Storage Tanks

Ecology's leaking UST (LUST) list is limited to reported leaking USTs. **A review of Ecology's listing of LUST facilities dated November 1, 1999 revealed five LUST facilities located within approximately one-half mile of the subject site.**

The nearest site is listed as SOUTH EVERETT TIRE DEX #3258 (Goodyear) at 531 128TH ST SW, located approximately one-eighth mile west and upslope of the site. A file concerning the Goodyear facility was reviewed at Ecology's Northwest regional office in Bellevue, Washington. Information in the file indicated the release was associated with the removal of a waste oil UST in 1996. Soil surrounding the UST was affected by the release, but groundwater was reportedly not affected. The soil contamination was cleaned up, and a "reported cleaned up" status was given to the Goodyear facility in 1998. Considering the reviewed information in the Ecology file, it is unlikely the reported release at the Ecology facility has affected the subject site.

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The remaining four facilities are listed below, along with their approximate distances and directions from the subject site:

1. TEUFEL NURSERY at 666 134TH SW 0.5 mile southeast
2. 90445 PDQ OIL 1112 at 200 128TH SW one-eighth mile east-southeast
3. TEXACO STATION #63-076-0340 at 201 128TH ST SW 0.5 mile east
4. MCKESSON DRUG COMPANY at 710 132ND STREET SW 0.25 to 0.5 mile southwest

The above LUST facilities are situated in positions that appear to be hydrologically non-tributary to the subject site, based on the topography, and thus it is unlikely contamination at these facilities would migrate to the subject site.

8.6 Emergency Response Notification System Spill Report

The Emergency Response Notification System (ERNS) Spill Report is a national database used to collect information on reported accidental releases of oil and hazardous substances. The database contains information from spill reports made to federal authorities including the EPA, the United States Coast Guard, the National Response Center, and the United States Department of Transportation. **A review of the yearly ERNS lists, dated from January 1987 through November 3, 1999 did not reveal the subject site to be listed.**

8.7 Landfills

Two listings/studies/reports of landfills compiled by Ecology and the local health department were reviewed for landfills located within an approximate one-half mile radius of the host parcel. The reviewed documents included the Snohomish Health District's "*Solid Waste Sites of Record*" (June 2, 1997), and Ecology's listing of Municipal Solid Waste (MSW) facilities located in the state of Washington (dated November 22, 1996). **The reviewed listings/studies/reports includes one landfill located within one-half mile of the host parcel.** The landfill is listed as McCOLLUM/EMANDER SWLF/closed AT 600 128th St SE. This landfill additionally appears on Ecology's CSCS listing, and is discussed in Section 8.2.

9.0 LIMITED ASBESTOS-CONTAINING MATERIALS SURVEY

The Phase I included a limited visual survey for suspect asbestos-containing building materials (ACBM) for the site building. While an EPA accredited Asbestos Hazard Emergency Response Act (AHERA) building inspector performed the limited visual survey for suspect ACBMs, it should be noted that it does not constitute an AHERA style survey. The visual survey for suspect ACBMs does not satisfy the "*Good Faith Inspection*" requirements specified in WAC 296-62-07721, and other federal, state, and local regulations for buildings that are to be renovated or demolished. The limited visual survey was conducted by performing a walkthrough of accessible areas of the site building and noting exposed building materials that are typically considered to be suspect ACBMs. The quantity and exact locations of the suspect ACBMs were not recorded.

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Suspect ACBMs observed by ADaPT included gypsum wallboard; several types of suspended "T-grid" ceiling panels; several types of sheet vinyl flooring and 12-inch floor tile; cove base; and carpet mastic. Although the roof was not accessed, it is flat and is likely covered with an asphalt composite, which is considered a suspect ACBM. The observed suspect ACBMs were in a good condition. The suspect ACBMs that may be considered friable are the ceiling panels. A material is considered friable if, when dry, it can be crushed, pulverized, or reduced to powder under hand pressure. A friable ACBM is more likely to release asbestos fibers into the air. The non-friable suspect ACBMs may become friable if sufficiently disturbed.

10.0 DRY CLEANERS/LIMITED SOIL VAPOR SAMPLING & TESTING

10.1 Background

Suite E is occupied by Lisa's Custom Dry Cleaners. Dry cleaners use solvents such as perchloroethylene (PCE)¹ that are considered hazardous substances if released to the environment. Perchloroethylene and its breakdown daughter compounds, trichloroethylene, dichloroethylene, and vinyl chloride are chemicals of concern. Perchloroethylene and other chlorinated solvents are considered extremely mobile if released in the environment and increase in toxicity with time. Because these compounds are dense non-aqueous phase liquids (DNAPLs), upon release to the environment, they tend to migrate quickly down (from gravity) through permeable soils and groundwater supplies. Eventually, DNAPLs will migrate through less permeable clay and silt layers depending upon the volume of release. Typically a free-phase product component of PCE "fingers" down through subsurface material and groundwater supplies collecting temporarily on less permeable strata. A dissolved-phase PCE component can also be released to groundwater supplies when free-phase product enters the groundwater supplies. A vapor phase of PCE is additionally possible through off-gassing from soils and groundwater.

10.2 On-Site Dry Cleaners History

Historical research indicates Alderwood Dry Cleaners (Alderwood) occupied the subject building from the time the building was opened in 1984 until 1994. According to Ms. Rose Dammrose of Management Northwest, Inc., the site management company, Alderwood was originally in Suite F, which is adjacent to the current dry cleaning operation in Suite E. Ms. Dammrose said her records show Alderwood moved from Suite F to Suite E in 1993. Ms. Dammrose said that she thinks that Alderwood was a drop-off operation while it occupied Suite F, and then started conducting on-site dry cleaning after moving to Suite E in 1993. In support of this possibility is the fact that Suite F is at least half the size of Suite E, and appears to not have enough room for an on-site dry cleaning operation.

The current proprietors of Lisa's Custom Dry Cleaners, Dick and Lisa Yu, told ADaPT they bought the dry cleaning operation in 1997. The Yus confirmed that the on-site Alderwood operation was a "drop shop", with the dry cleaning conducted at a facility in Lynnwood, Washington. Mr. Yu said the current dry cleaning machine has been in operation in Suite E since 1994, and that to his knowledge, it is the only machine that has operated on site. Mr. Yu said that when he acquired the dry cleaners in 1997, a containment pan was placed beneath the dry cleaning machine.

¹ Perchloroethylene is also known as perc, tetrachloroethene, and tetrachloroethylene.

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10.3 Dry Cleaners Observations

The dry cleaning equipment is a self-contained machine that, according to the proprietor, was installed in 1994. The machine has a closed loop that re-uses the PCE. Safety Kleen maintains the machine by periodically adding PCE and removing the waste still bottoms. A record attached to the side of the machine indicates that 80 gallons of PCE were added to the machine in 1994, and the periodically 10 gallons have been added as needed. Since 1994, 50 to 60 make-up gallons of PCE have been added to the machine. No PCE containers are reportedly stored by the business and none were observed by ADaPT. The surrounding concrete floor did not exhibit indications of spillage. The nearest floor drain is in a separate boiler room, approximately 15 feet from the machine. There is a seam in the concrete floor immediately to the west of the dry cleaning machine.

10.4 Sampling & Testing

To assess whether there has been a release of PCE at the site, ADaPT conducted Limited Soil Vapor Sampling & Testing in Suite E where the current dry cleaners is situated. Verbal authorization to perform the Limited Soil Vapor Sampling & Testing was given by Mr. Shaun S. Yoo of America's Choice Real Estate on November 17, 1999. Written authorization to conduct the Limited Soil Vapor Sampling & Testing was given with the acceptance of ADaPT General Services Contract P-1538, signed by Mr. Young Shin of Empire Enterprises, Inc. on November 19, 1999. This preliminary study does not include the work scope required to fully delineate the exact vertical and lateral extent of a PCE release.

Four soil vapor samples were collected from Suite E on November 18, 1999. The approximate sample locations are depicted on the Sample Location Plan (Figure 5) attached at the end of the report. In short, the samples were collected immediately to the west, south, and east of the dry cleaning machine, and the fourth sample was collected from near a floor drain in the boiler room.

At the four sample locations, a roto-hammer, with a 1.5-inch bit was used to drill through the approximate four-inch thick concrete, and approximately six to eight inches into the soil beneath the concrete slab. All holes were field screened using a portable Mini RAE photoionization detector (PID) with a 10.6-ev lamp. The PID readings were obtained prior to soil vapor sampling by inserting the PID probe tip into the hole to just below the bottom of the concrete. An AMS hand soil gas probe with a soil gas tip was placed in each hole and driven approximately 1.5 feet into undisturbed soil at the bottom of the hole. The soil gas tip was opened by retracting the probe approximately 2 inches to expose the screen to the soil. Soil gas samples were collected using the PID as a pump. A ¼-inch inside-diameter polyethylene tube was attached to the soil gas tip and to the PID's tip. A second ¼-poly tube was attached to the out port of the PID and was connected to a Tedlar bag. The Tedlar bag was opened and allowed to be filled to approximately 80% of full. The Tedlar bags containing the four samples were placed in a cooler at approximately 4 degrees Celsius for transport to the laboratory under ADaPT's chain of custody.

All sampling and drilling equipment was decontaminated between each sampling event with a water and Liqui-Nox solution. The equipment was rinsed with tap water and final rinsed with de-ionized water. The concrete slab was repaired with Quick-Crete.

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The samples were delivered to the laboratory by the end of the day, November 18, 1999 under ADaPT's chain-of-custody. North Creek Analytical of Bothell, Washington performed the analytical testing. The samples were tested for halogenated volatile organics by EPA Method 8021B (modified). The samples were analyzed on a 24-hour turn-around-time.

Table 1 summarizes the sample number, location, and concentration of PCE in parts per million (ppb), which is a rough approximation of micrograms per liter of air.

TABLE 1		
Sample Number	Sample Location	PCE Concentration
HP-1	Adjacent to the west of the dry cleaning machine.	85.3 ppb
HP-2	Adjacent to the south of the dry cleaning machine.	36.6 ppb
HP-3	Adjacent to the east of the dry cleaning machine.	72.1 ppb
HP-4	Adjacent to the floor drain in the boiler room.	12.6 ppb

EPA Method 8021B (modified), in addition to PCE, tests for 27 other halogenated volatile organic compounds, including the PCE daughter compounds trichloroethylene, dichloroethylene, and vinyl chloride. None of the additional 27 halogenated volatile organic compounds were detected above the reporting limit in the four samples.

11.0 CONCLUSIONS AND RECOMMENDATIONS

The Phase I revealed the presence of three recognized environmental conditions associated with the subject site. The conditions are presented below, along with recommendations.

1. Dry cleaning has been conducted in Suite E of the site building since 1994. Because PCE is commonly released to the environment by dry cleaning operations, ADaPT conducted Limited Soil Vapor Sampling & Testing in Suite E. Four soil vapor samples were collected from beneath the concrete slab, around the dry cleaning equipment, and near a floor drain in a separate boiler room. Testing of the vapor samples found concentrations of PCE ranging from approximately 12.6 ppb to 85.3 ppb. Based on the results of the soil vapor testing, it is ADaPT's opinion that a release of PCE has occurred at the site. What is not known from the preliminary data collected is the magnitude of the release.

In ADaPT's opinion, it would be prudent to further evaluate the apparent PCE release at the site. Firstly, soil samples from beneath the slab, near the dry cleaning machine may be collected. This is based on the assumption that the release point is near the dry cleaning machine. This would involve coring of an approximate 12-inch diameter hole in the slab, and collecting soil samples either by hand tools or a limited access drill rig. Preferably, samples would be collected at depths where field reading instruments no longer detect vapors; however, this would be dependent upon the available sampling method. If PCE concentrations taper off with depth, then it is possible the release is limited to the immediate area of the dry cleaning machine. If PCE concentrations do not taper off, then it is possible that the release has migrated downward and reached near-surface groundwater.

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In this case, it would then be prudent to collect near-surface groundwater samples from the site, and test them for PCE. A prudent method for collecting near-surface groundwater samples is to use a Geoprobe or similar type drill rig that uses hydraulics to advance rods into the ground. Sample collection points would be adjacent to the exterior of Suite E.

2. The three on-site USTs that are owned and operated by The Southland Corporation (7-Eleven) are an environmental concern because of the potential for past or current leaks and spills. The USTs and their piping, however, reportedly are in compliance with the Washington UST regulations (Chapter 173-360 WAC). Further, the USTs and piping have passed tightness testing since 1993. While ADaPT found no information that there has been a release associated with the USTs, they may be considered a potential source of a release.
3. Suspect ACBMs associated with the site building included gypsum wallboard; several types of suspended "T-grid" ceiling panels; several types of sheet vinyl flooring and 12-inch floor tile; cove base; and carpet mastic. Although the roof was not accessed, it is flat and is likely covered with an asphalt composite, which is considered a suspect ACBM. Considering the 1984 construction date of the site building, it is less likely the observed suspect ACBMs contain asbestos. This is because the manufacturing of ACBMs was halted in 1980.

Currently, there is no regulatory need for a more thorough sampling survey to be performed, unless renovation or demolition activities are anticipated. Any activities that would cause the observed suspect ACBM to become damaged or friable should be avoided. These activities include, but are not limited to, renovation, demolition, sanding, cutting, grinding, or abrading, especially by mechanical methods. Prior to demolition or renovation, federal and state regulations require that a more thorough asbestos survey be performed by an EPA AHERA Building Inspector. The survey would involve the collection and analytical testing of bulk samples of suspect ACBMs. If an asbestos survey confirms the presence of ACBMs in a building, the ACBMs must first be removed in accordance with applicable regulations prior to renovation or demolition. Depending on the type of ACBMs and the removal method, the removal may need to be performed by state certified asbestos workers.

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ADaPT appreciates the opportunity to be of service to you on this project. Should you have any questions concerning this report, or if we can assist you in any way, please contact us at (206) 654-7045.

Respectfully Submitted,

ADaPT Engineering, Inc.

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AEE/ace

APPENDIX A

LABORATORY CERTIFICATION