



Geotechnical Engineering
Construction Observation/Testing
Environmental Services



**PHASE I ENVIRONMENTAL SITE ASSESSMENT
MARYSVILLE PROPERTY
3812, 3824, 3922, 3930, AND 4000 - 88TH STREET NORTHEAST
MARYSVILLE, WASHINGTON**

ES-6271.01

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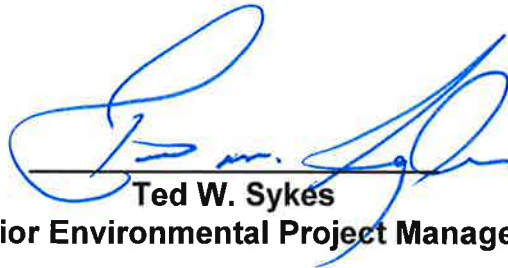
PREPARED FOR

DEVCO, INC.

October 2, 2018



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EXECUTIVE SUMMARY

At the request of Mr. David Ratliff of DevCo, Inc. (Client), Earth Solutions NW, LLC (ESNW) has completed a Phase I Environmental Site Assessment (ESA) for the subject site located southwest of the intersection between 88th Street Northeast and State Avenue, in Marysville, Washington (see Vicinity Map – Plate 1). This Phase I ESA was prepared in general accordance with the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, Designation E1527-13.

The following addresses are listed in connection with the subject property: 3812, 3824, 3922, 3930, and 4000 – 88th Street Northeast, in Marysville, Washington. The property consists of one tax parcel (Snohomish County Parcel No. 30052100203800) comprising a total of approximately 21.43 acres of land area (see Site Plan – Plate 2). The site is currently developed with a commercial retail building, one light industrial manufacturing warehouse, three commercial storage buildings, a single-wide mobile home facility, and detached garages, sheds, and carports constructed between 1946 and 1986 (according to Snohomish County Assessor Office [SCAO] documents). Remaining portions of the site consist of grass and tree-covered areas. See below for detailed discussion of former and current business occupants at the subject site.

The subject site was formerly occupied by Quil Ceda Tanning (and one other company – Jansha Tanning Company) for treatment, production, embossing and/or dyeing, and sale of animal hides for the approximate time period of 1946 to 2011 (3824 – 88th Street Northeast). Metal coating and painting activities (completed by Metal Finishing Inc. and prior companies) reportedly occurred at the property from approximately 1988 to 2006 (4000 – 88th Street Northeast). Additionally, from 1997 to 2011, various construction companies (specifically JR Construction and, subsequently, Gott Construction) occupied the structures and associated fenced lot at 3930 – 88th Street Northeast. During our site reconnaissance, the property owner verbally reported that previous construction company occupants stored empty heating fuel tanks at the property following removal from off-site construction projects and/or completed rebar cutting activities with electric-powered cutting equipment.

Presently, the former Quil Ceda Tanning retail store is occupied by Dry County Distillery for production and sale of alcohol (3922 – 88th Street Northeast). Also, the structures and associated fenced lot at 3930 – 88th Street Northeast are now occupied by Nordstrom Heating and Air for the sale and/or maintenance of heating and air conditioning units. Finally, one single-wide residential mobile home is present in the central portion of the subject site (3812 – 88th Street Northeast). Remaining structures at the property are currently vacant.

No obvious visual indication of outdoor hazardous material spills, stressed vegetation, and/or chemical/petroleum odors were noted by ESNW during the site reconnaissance. However, significant chemical and hazardous waste storage was observed at the property, including outdoor storage of two 55-gallon drums (one empty and one full) on soil west of 3930 – 88th Street Northeast. Additionally, significant concrete staining was observed in the structures associated with Quil Ceda Tanning operations and Metal Finishing Inc. operations. There is potential for historical releases of chemicals to site soil in areas of current and former outdoor chemical storage, which represents a recognized environmental condition (REC) for the property. See Table 6 of this report for further discussion of site observations.

Three heating fuel steel underground storage tanks (USTs) and one “hazardous substance” concrete UST are listed in Washington State Department of Ecology (Ecology) records for the subject site. These USTs were reportedly installed in 1964, and no record was identified indicating UST removal following an “exempt” status update in 1996. No aboveground storage tanks (ASTs) were listed on the regulatory databases for the subject property. Several large, empty metal drums and concrete-lined below-grade tubs (used for treatment and drying of animal hides) remain within Quil Ceda Tanning’s former operations buildings. However, no ASTs or fill ports/vent pipes associated with potential abandoned heating fuel or hazardous substance USTs were observed at the property during our site reconnaissance. Based on Ecology’s records and the age of the on-site structures, there is potential that abandoned heating fuel (and/or hazardous substance) USTs remain at the property. See Appendix J to review Ecology’s records.

The Environmental Data Resources, Inc. (EDR) report identified the subject site on Federal, State, and/or local regulatory databases in connection with several different addresses, businesses, and/or sources of historical soil contamination at the property. Specifically, Spills and Confirmed and Suspected Contaminated Sites List (CSCSL) regulatory databases indicated the presence of chromium-impacted soil at concentrations above Ecology’s Model Toxics Control Act (MTCA) Method A chromium cleanup level for unrestricted land-use (CUL). A limited Subsurface Investigation, completed by Aspect Consulting, LLC in 2016 at the buildings and surrounding lot formerly occupied by Metal Finishing Inc., identified no concentrations of chromium III in soil exceeding the MTCA Method A chromium CUL and no detectable concentrations of chromium VI in soil. However, one localized area of soil reportedly contained concentrations of arsenic exceeding the MTCA Method A arsenic CUL. Also, a 2018 Spills listing for Metal Finishing Inc. indicates additional releases of chromium-impacted wastewater to site soil following the 2016 limited subsurface investigation completed by Aspect Consulting, LLC. Additionally, Spills listings for Quil Ceda Tanning and CSCSL records of chromium concentrations in soil that exceed the MTCA Method A chromium CUL, as well as the lack of recorded soil and/or groundwater sampling around the Quil Ceda Tanning operations buildings, indicates a separate REC at the property.

Section 3.1.1 discusses regulatory database listings for the subject site. Section 4.5 of this report discusses previous Phase I ESA and [Limited] Subsurface Investigation report findings, and Section 6.1 discusses records of some former cleanup and waste disposal at the Quil Ceda Tanning operations buildings. Appendix J includes Ecology Spills, CSCSL, UST, and hazardous waste records for the subject site. Appendix L includes previous Phase I ESA and [Limited] Subsurface Investigation reports (among others).

The EDR report also identified several nearby properties on the Federal, State, and/or local regulatory databases. The “Jiffy Lube Marysville” site (8417 State Avenue) is listed on the CSCSL and UST regulatory databases (among others) in connection with diesel-contamination of soil at concentrations reportedly exceeding the MTCA Method A CUL of 2,000 mg/kg. As the “Jiffy Lube Marysville” facility is located within 200 feet east of and upgradient (along the inferred hydraulic groundwater gradient) from the subject site, and there is no available record of remediation being completed at the facility, there is potential for shallow, perched groundwater to interact with remnant soil contamination and allow contaminants to migrate toward the subject site.

However, given the lack of recorded soil or groundwater contamination at the remaining off-site facilities, the nature of the listings, the distance between these remaining facilities and the subject site, a No Further Action (NFA) determination from Ecology, and/or the present of a hydraulic groundwater barrier, the remaining off-site facilities do not represent an environmental concern for the subject site. Section 3.1.2 discusses regulatory database listings for nearby off-site facilities.

The reconnaissance of the subject property and adjacent properties, a review of regulatory lists and files, a review of the subject property history, and interviews with knowledgeable persons revealed evidence of several historical RECs (HRECs), current RECs, and a potential off-site environmental concern. Specifically, identified HRECs, RECs, and a potential off-site environmental concern consist of the following:

1. Long-term use and reported releases of fluids containing chromium on-site as part of historical tanning operations (HREC and potential current REC) and potential remnant buried hides (treated with chromium) or other waste byproducts from historical tanning operations (potential current REC).
2. Past use and reported past releases of solvents and metal-bearing (including chromium) solutions (fluids) in the commercial buildings in the southeast corner of the site (HREC); identified area of arsenic in soil exceeding the MTCA Method A arsenic CUL (REC); and more recent 2018 spill record indicating release of chromium wastewater to site soil (REC).
3. “The surficial releases of petroleum hydrocarbons and accumulation of debris on the contractors tenant space in the northeast corner of the site,” as identified in the 2006 Phase I ESA report completed by Aspect Consulting, LLC (REC).
4. Potential abandoned heating fuel and/or “hazardous substance” USTs at the property, which may have released heating fuel and/or “hazardous substances” to site soil (potential current REC).
5. Remnant diesel-contaminated soil at the “Jiffy Lube Marysville” property (located at 8417 State Avenue, east of and contiguous to the subject site) may interact with shallow perched groundwater, allowing for migration of contaminants toward the subject site (potential environmental concern).

Please see Section 8.1 of this report for overall recommendations regarding the subject site.

This is an executive summary of findings and should not be relied upon without consulting the attached report for a more detailed description of the Phase I ESA performed by ESNW for the use of DevCo, Inc. This report is subject to the limitations included in Section 1.5 of this report.

Table of Contents

ES-6271.01

<u>Section</u>	<u>Page</u>
1.0 INTRODUCTION	1
1.1 LOCATION AND LEGAL DESCRIPTION	1
1.2 PURPOSE	1
1.3 SCOPE-OF-SERVICES	2
1.4 USER RELIANCE	3
1.5 LIMITING CONDITIONS AND EXCEPTIONS	3
1.6 DEVIATIONS FROM APPLICABLE GUIDANCE	4
1.7 SIGNIFICANT ASSUMPTIONS AND SPECIAL TERMS AND CONDITIONS	4
2.0 USER-PROVIDED INFORMATION	5
2.1 TITLE RECORDS, ENVIRONMENTAL LIENS, AND ACTIVITY AND USE LIMITATIONS	5
2.2 VALUE REDUCTION	5
3.0 RECORDS REVIEW	6
3.1 STANDARD ENVIRONMENTAL RECORDS SOURCES	6
3.1.1 Subject Site	8
3.1.2 Off-Site Facilities	8
3.2 ADDITIONAL AGENCY ENVIRONMENTAL RECORDS	9
4.0 HISTORICAL USE OF THE PROPERTY AND ADJOINING PROPERTIES	12
4.1 AERIAL PHOTOGRAPHY	12
4.1.1 Subject Site	13
4.1.2 Surrounding Areas	13
4.2 SANBORN FIRE INSURANCE MAPS	14
4.3 CITY DIRECTORIES	14
4.4 HISTORICAL TOPOGRAPHIC MAP REVIEW	14
4.5 PREVIOUS ENVIRONMENTAL SITE ASSESSMENT REPORTS	15
5.0 SITE RECONNAISSANCE	17
5.1 GENERAL SITE SETTING	17
5.2 SITE OBSERVATIONS	17
5.3 DESCRIPTION OF PROPERTY STRUCTURES/IMPROVEMENTS	24
5.4 CURRENT USES OF SURROUNDING PROPERTIES	24
5.5 GEOLOGY AND GROUNDWATER	24

Table of Contents

Cont'd

ES-6271.01

<u>Section</u>	<u>Page</u>
6.0 INTERVIEWS	25
6.1 SITE OWNER REPRESENTATIVE.....	25
6.2 LOCAL GOVERNMENT OFFICIALS.....	26
7.0 EVALUATIONS	27
7.1 FINDINGS AND CONCLUSIONS.....	27
7.2 ADDITIONAL SERVICES	30
7.3 QUALIFICATIONS AND STATEMENT OF ENVIRONMENTAL PROFESSIONALS	30
8.0 NON-SCOPE SERVICES.....	31
8.1 RECOMMENDATIONS.....	31
9.0 REFERENCES	33

TABLES

1	Location and Legal Description	1
2	Records and Review – Search Distance Findings.....	7
3	Agency Records Search.....	10
4	Historical Sources.....	12
5	Aerial Photographs Reviewed	12
6	Site Observations	17
7	Surrounding Properties.....	24

PLATES

1	Vicinity Map
2	Site Plan

Table of Contents

Cont'd

ES-6271.01

APPENDICES

A	The EDR Radius Map Report with GeoCheck
B	Site Photographs
C	Snohomish County Assessor Documents
D	The EDR Certified Sanborn Map Report
E	The EDR Aerial Photo Decade Package
F	The EDR City Directory Image Report
G	The EDR Historical Topographic Map Report
H	Completed Environmental Questionnaire and Email Correspondence
I	Resumes of Environmental Professionals
J	Ecology Records
K	Records Request Responses
L	Owner-Provided Records
M	Environmental Soil Boring Logs

1.0 INTRODUCTION

1.1 LOCATION AND LEGAL DESCRIPTION

The information presented in Table 1 describes the physical location and legal description of the site. This information was obtained from observations made during the site reconnaissance and information obtained from maps, public records, and interviews.

Table 1
Location and Legal Description

SITE NAME	Marysville Property.
SITE ADDRESSES	3812, 3824, 3922, 3930, and 4000 – 88 th Street Northeast, Marysville, Washington.
LOCATION	Southwest of the intersection between 88 th Street Northeast and State Avenue, in Marysville, Washington.
SITE PARCEL NUMBER	30052100203800.
LEGAL DESCRIPTION	30052100203800: SEC 21 TWP 30 RGE 05 TH PTN OF E1/2 SW1/4 NW1/4 & N1/3 E1/2 NE1/4 NW1/4 SW1/4 LY E OF QUILCEDA CREEK & TGW BEG AT NW COR SE1/4 NW1/4 TH S ON 1/16TH LN TAP THAT IS N01*24 37W 169.92FT FR COR SE1/4NW1/4 TH E TO WLY MGN OF GN RR TH N ALG SD R/W TO INT N BDY OF SE1/4 NW1/4 TH W ALG SD N BDY TO TPB LESS CO RD & LESS ADD'L RD R/W PER QCD 357/34 & PER SWD REC AF 9403240117 REFER TO 213005-2-038-0105FOR MH ONLY.
TOWNSHIP, SECTION, & RANGE	Township: 30 North, Section: 21, Range: 05 East.
ACREAGE	Approximately 21.43 acres.

1.2 PURPOSE

ESNW conducted a Phase I ESA for the Marysville Property, located southwest of the intersection between 88th Avenue Northeast and State Avenue, in Marysville, Washington (as shown in Plate 1). In this report, the property will be referred to as “the site”, “subject site”, “subject property”, or “the property”.

ESNW understands DevCo, Inc. (Client) will use the information contained in this report to better understand environmental conditions associated with the past and current use of the site. ESNW performed this Phase I ESA in accordance with our August 6, 2018 Phase I ESA Proposal (PES-6271.01) and in general accordance with the scope and limitations of the ASTM Standard Practice for Phase I ESAs: ESA Process E1527-13.

The purpose of this assessment is to assist the client, in recognizing “environmental conditions” at the site. A REC is defined by the ASTM standard as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions”.

ESNW performed a reconnaissance of the subject site and surrounding properties on August 21, 2018. Information obtained during the site reconnaissance, as well as information obtained at public agencies reviewed by ESNW, was used to complete this Phase I ESA investigation.

1.3 SCOPE-OF-SERVICES

The following sections of this report (summarized below) describe the report format and scope:

- **Executive Summary:** This section provides a summary of the Phase I ESA process, findings, opinions, and conclusions.
- **Section 1, Introduction:** This section identifies the property, location, legal description, and the purpose of the Phase I ESA. This section also provides contractual details as well as limiting conditions, deviations, exceptions, significant assumptions, and special terms and conditions.
- **Section 2, User-Provided Information:** This section presents information provided by the user of the Phase I ESA and information from the user questionnaire.
- **Section 3, Records Review:** This section presents a review of standard and additional environmental records sources available from Federal, State, and local regulatory agencies regarding hazardous substance use, storage, or disposal at the site, and for off-site facilities up to a one mile radius from the site. Environmental liens or activity and use limitations determined during this records review are included in this section.
- **Section 4, Historical Use of the Property and Adjoining Properties:** This section provides a summary of the historical use of the site and adjoining properties. This history is based on various sources including a review of: aerial photographs, fire insurance maps, city or suburban directories, historical topographic maps, chain-of-title records (if provided by the client), and previous environmental reports completed for the site (if available).
- **Section 5, Site Reconnaissance:** This section presents site reconnaissance observations including general site setting, interior and exterior observations, current uses and conditions of the property and adjoining properties, and a discussion of the geology and groundwater of the site.
- **Section 6, Interviews:** This section provides a summary of interviews regarding the subject property, including the site owner representative and local government officials.
- **Section 7, Evaluations:** This section presents a summary of our findings, opinions, and conclusions as they pertain to environmental conditions associated with the subject site. This section also presents deviations (if applicable) from ASTM Standard Practice for Phase I ESAs: ESA Process E1527-13. A summary of the qualifications and statement of the Environmental Professionals (Ms. Jessica D. Babb and Mr. Ted W. Sykes) involved in the completion of this Phase I ESA are also provided in Section 7.

- Section 8, **Non-Scope Services**: Based on the results of the Phase I ESA investigation, this section presents our recommendations regarding environmental conditions associated with the subject site.
- Section 9, **References**: This section provides a summary of the resources used to compile this report.

1.4 USER RELIANCE

This Phase I ESA has been prepared for the exclusive use of the Client. The contents of the report should not be relied upon by other parties without the express written consent of ESNW and the Client.

Provided this report is still reliable (as determined by ESNW), ESNW may issue a third-party reliance letter to a party, other than the Client, identifying in writing under the following conditions: that the third party, including the client and their successors and assigns, by such reliance, agree in writing to be bound by Terms and Conditions of the contract between the Client and ESNW.

Based on the intended use of the report, ESNW may require that additional work be performed and that an updated report be issued. Non-compliance with any of these limitations, by the Client or anyone else, will release ESNW from any liability resulting from the use of this report by any unauthorized party.

1.5 LIMITING CONDITIONS AND EXCEPTIONS

A Phase I ESA is non-comprehensive by nature and is unlikely to identify all environmental problems or eliminate all risk. The report is a qualitative assessment. ESNW offers a range of investigative and engineering services to suit the needs of our clients, including more quantitative investigations. Although risk can never be eliminated, more detailed and extensive investigations yield more information, which may help you understand and better manage your risks. Since such detailed services involve greater expense, we ask our clients to participate in identifying the level of service which will provide them with an acceptable level of risk. Please contact the signatories of this report if you would like to discuss further this issue of risk management as it relates to more quantitative investigation.

ESNW performed this Phase I ESA in general accordance with the scope and limitations of the ASTM Standard Practice for Phase I ESAs: ESA Process E1527-13. No warranty, either expressed or implied, is made. Environmental issues not specifically addressed in the report were beyond the scope of our services and not included in this Phase I ESA evaluation.

Land use, site conditions (both on-site and off-site), and other factors will change over time. Since site activities and regulations beyond our control could change at any time after the completion of this report, our observations, findings, and opinions can be considered valid only as of the date of the site visit. This report should not be relied upon after 180 days from the date of issuance (ASTM Standard E1527, Section 4.6).

1.6 DEVIATIONS FROM APPLICABLE GUIDANCE

This section presents deviations from ASTM Standard Practice for Phase I Environmental Site Assessments: Environmental Site Assessment Process E1527-13.

ESNW did not interview previous owners of the subject site during the course of this Phase I ESA investigation, as they were either unavailable or deceased.

1.7 SIGNIFICANT ASSUMPTIONS AND SPECIAL TERMS AND CONDITIONS

No site-specific significant assumptions or terms and conditions affecting the results or conclusions of this Phase I ESA were identified.

2.0 USER-PROVIDED INFORMATION

Mr. David Ratliff (DevCo, Inc.) provided ESNW with property owner information that was used to conduct this Phase I ESA. According to the Snohomish County Assessor's Office, "Matico LLC" is on record as the current owner of the subject site.

2.1 TITLE RECORDS, ENVIRONMENTAL LIENS, AND ACTIVITY AND USE LIMITATIONS

A current Chain-of-Title report or Property History document was not provided to ESNW for review prior to the production of this report. However, a 2006 title report was available for review as an appendix to a December 21, 2006 Phase I ESA report (completed by TAI). No environmental related liens have been identified at the site through review of this 2006 title report or during other portions of this Phase I ESA. Additionally, no Activity and Use Limitations (AULs), such as engineering controls, land use restrictions or institutional controls, have been identified at the site.

2.2 VALUE REDUCTION

As part of the ASTM E1527-13 process, information must be gathered regarding the prospective purchase price of the property relative to the fair market value of the subject site. If there appears to be a value reduction, that reduction must be identified with respect to whether the difference could be attributed to environmental degradation of the property. No environmental related value reduction for the property has been identified as of the date of this report.

3.0 RECORDS REVIEW

The purpose of the records review is to obtain and review records that will help identify recognized environmental conditions in connection with the subject site and surrounding properties.

3.1 STANDARD ENVIRONMENTAL RECORDS SOURCES

Federal, State, and local regulatory agencies publish databases or "lists" of businesses and properties that handle hazardous materials or hazardous waste, or locations of known releases of hazardous substances to soil and/or groundwater. These databases are available for review and/or purchase at the regulatory agencies, or the information may be obtained through a commercial database service. ESNW retained a commercial database service, Environmental Data Resources, Inc. (EDR), to review the regulatory agency lists for references to the subject site and other off-site listings within the appropriate ASTM minimum search distances. The EDR database search results for the subject site and for other nearby facilities are contained in the EDR Radius Map Report with GeoCheck (Appendix A), Regulatory Agency Database Report. The Federal and State databases reviewed along with the number of sites plotted in each database category are summarized in Table 2.

The EDR report identified one unmappable site in the site area listed as an "orphan site". Wherever possible, ESNW attempts to identify locations of orphan sites and include them as part of the records review, where applicable. The "Paine Field Federal Aviation" orphan site (located along Mission Beach Road, Marysville, Washington 98270) is listed on the Washington State Independent Cleanup Reports (ICR) regulatory database in connection with 1991 and 1992 records of petroleum-impacted soil from a leaking tank or tank spill. However, this orphan site is located well outside of ASTM minimum search distances and does not represent an environmental concern to the subject site.

Table 2
Records Review – Search Distance Findings

FEDERAL		Total Number of Facilities Listed	Number of Upgradient or Adjacent Facilities Listed*	Subject Site Listed
NPL (National Priority List)	Site & 1.0 Mile	0	0	No
Delisted NPL	Site & 0.5 Mile	0	0	No
CERCLIS (Comprehensive Environmental Response, Compensation, and Liability Act Information System)	Site & 0.5 Mile	0	0	No
CERCLIS NFRAP (No Further Remedial Action Planned)	Site & 0.5 Mile	0	0	No
RCRA (Resource Conservation and Recovery Act) CORRACTS (Corrective Actions Sites)	Site & 1.0 Mile	0	0	No
RCRA non-CORRACTS TSD (Transfer Storage and Disposal Sites)	Site & 0.5 Mile	0	0	No
RCRA Generators	Site & 0.25 Mile	5	5	Yes
US INST/ENG Controls (Institutional Control/Engineering Control Registries)	Site & Adjoining Properties	0	0	No
ERNS (Emergency Response Notification System Listings)	Site	0	0	No
LOCAL, STATE, AND TRIBAL				
Equivalent NPL – HSL (Hazardous Sites List)	Site & 1.0 Mile	2	0	No
CSCSL (Department of Ecology's Confirmed & Suspected Contaminated Sites List)	Site & 1.0 Mile	7	2	Yes
CSCSL NFA (Department of Ecology's Confirmed & Suspected Contaminated Sites List, with No Further Action determination)	Site & 0.5 Mile	3	2	No
SWF/LF (Solid Waste Facilities/Landfill Sites Database)	Site & 0.5 Mile	1	0	No
WA SWCRY (Recycling Facility Database)	Site & 0.5 Mile	3	1	No
LUST (Leaking Underground Storage Tank Sites)	Site & 0.5 Mile	1	0	No
UST (Underground Storage Tank Sites)	Site & 0.25 Mile	7	7	Yes
INST/ENG Controls	Site & 0.5 Mile	0	0	No
VCP (Voluntary Cleanup Program Sites)	Site & 0.5 Mile	1	1	No
BROWNFIELDS (Brownfields Sites Listings)	Site & 0.5 Mile	0	0	No
WA ICR (Washington State Independent Cleanup Reports)	Site & 0.5 Mile	2	0	No
Allsites	Site & 0.5 Mile	33	26	Yes

**Note: Upgradient facilities listed in Table 2 are topographically upgradient relative to the subject site but may not be upgradient along the inferred hydraulic groundwater gradient.*

3.1.1 Subject Site

The EDR report identified the subject site on Federal, State, and/or local regulatory databases in connection with several different addresses, businesses, and/or sources of historical soil contamination at the property. One listing is incorrectly plotted off of the subject site in the EDR report but is associated with the property. The "Quil Ceda Tanning Co Inc." (T30N R5 S21) UST regulatory database listing indicates the presence of three steel heating fuel USTs and one "hazardous substance" UST (all reportedly installed on December 31, 1964). These recorded USTs represent a potential REC for the subject site, in connection with potential past and/or current releases of heating fuel and/or "hazardous substances" at the subject site.

EPCRA (Emergency Planning and Community Right-to-Know Act), RCRA-LQG, and FTTS regulatory database listings exist for the property in connection with operations of the tannery and production of hazardous wastes. Specific hazardous wastes associated with "Quil Ceda Tanning" are listed in RCRA-LQG permitting records, included in Appendix J.

The subject site ("Quil Ceda Tanning", at 3812 and 3922 – 88th Street Northeast) is also listed on the CSCSL and Spills regulatory databases in connection with "metals" contamination of soil, exceeding the applicable Ecology's Model Toxics Control Act (MTCA) Method A cleanup level for unrestricted land-use (CUL), and other recorded releases to site soil. Associated records can be reviewed in Appendix J of this report. Records of chromium releases to site soil, reportedly in exceedance of the MTCA Method A chromium CUL, represent an HREC and potential current REC. Based on the available records, there is potential that groundwater, shallow perched groundwater, and/or surface water in the nearby Quilceda Creek were also impacted by chromium during historical operation of the tannery.

Additionally, the "Metal Finishing Inc." business (4000 – 88th Street Northeast) at the subject site is listed on the HAZNET, FINDS, RCRA-LQG (associated with metal plating and painting operations and associated hazardous waste production), and Spills regulatory databases (among others). Applicable records (hazardous waste production permit documents and spill records) can be reviewed in Appendix J of this report. Spills listings associated with a reported March 29, 2018 release of chromium-impacted wastewater to site soil represent an HREC and potential current REC.

3.1.2 Off-Site Facilities

The EDR report also identified several nearby properties on the Federal, State, and/or local regulatory databases.

The "Charlie State Avenue Collision Repair" (9015 State Avenue North), "Precision Tune Marysville" (9113 State Street), and "Haggen OPCO North LLC Marysville" (3711 – 88th Street Northeast) sites are listed on the Federal RCRA-CESQG regulatory database in connection with Conditionally Exempt Small Quantity Generation of hazardous wastes. These three off-site facilities are located topographically upgradient from, within one-quarter mile of (but in excess of 400 feet from), and north of the subject site. However, given the lack of recorded soil or groundwater contamination at these facilities, the nature of the listings, and the distance between these facilities and the subject site, these off-site facilities do not represent an environmental concern for the subject site.

No other off-site facilities are listed on Federal regulatory databases within ASTM minimum search distances from the subject site.

The “Jiffy Lube Marysville” site (8417 State Avenue) is listed on the CSCSL and UST regulatory databases (among others) in connection with diesel-contamination of soil at concentrations reportedly exceeding the MTCA Method A CUL of 2,000 mg/kg. UST records indicate the presence of a 1,000-gallon waste oil UST (installed in 1987 and closed in place in 1998) and a 4,000-gallon motor oil UST (also installed in 1987 and closed in place in 1998). Additionally, records included in Ecology’s online Document Repository for cleanup sites indicate an initial discovery of soil contamination in 2007 (additionally including heavy oil-range hydrocarbons and cadmium), initial participation in the VCP, and subsequent cancellation of the VCP Agreement by Ecology in 2013 due to indications that the site owner had never begun or had discontinued soil remediation efforts. As the “Jiffy Lube Marysville” facility is located within 200 feet east of and upgradient (along the inferred hydraulic groundwater gradient) from the subject site and there is no available record of remediation being completed at the facility, there is some potential for shallow, perched groundwater to interact with remnant soil contamination and allow contaminants to migrate toward the subject site. See Section 8.1 for recommendations.

Given the distance between remaining UST-listed facilities and the subject site, the hydraulic groundwater gradient, the presence of a hydraulic barrier, and/or an NFA determination from Ecology, the remaining UST-listed facilities do not represent an environmental concern for the subject site.

The “Seattle Goodwill” site (9315 State Avenue) is listed on the SWRCY regulatory database in connection with recycling of “portable DVD players” (and similar electronics) the E-Cycle Washington electronics recycling program. “Seattle Goodwill” is located greater than one-quarter mile north of and topographically upgradient from the subject site. Actual recycling activities do not occur on-site, and this off-site facility does not represent an environmental concern.

Given the nature of the remaining off-site facility listings, the lack of recorded soil or groundwater contamination, an NFA determination from Ecology, the distance between the off-site facilities and the subject site, and/or the hydraulic groundwater gradient, the remaining off-site facilities don’t represent an environmental concern to the subject site.

The one identified orphan site is located well outside of ASTM minimum search distances and does not represent an environmental concern to the subject site.

3.2 ADDITIONAL AGENCY ENVIRONMENTAL RECORDS

Local regulatory agencies were contacted and interviewed for reasonably ascertainable and practicably reviewable documentation regarding recognized environmental conditions present at the site and surrounding properties. Table 3 summarizes the agencies contacted for documentation:

Table 3
Agency Records Search

	AGENCY	DATE	CONTACT NAME	PHONE	TYPE OF INFORMATION
City	Marysville City Hall.	August 30, 2018.	Ms. Janis Lamoureux, Planning Specialist.	(360) 363-8214.	Permit and Parcel Map Information, Zoning Codes, Hazardous Materials Records, Critical Areas Records, and Historical Site Use Information.
County	Snohomish County Fire Marshal.	August 17, 2018.	Ms. Maggie Dervin, Records Specialist.	(425) 388-3622.	UST and Hazardous Materials Storage and Spill Records.
County	Snohomish County Health District.	August 23, 2018.	Ms. Jannah Abdul-Qadir, Privacy and Public Records Officer.	(425) 339-8641.	Septic Systems, Wells, ASTs, USTs, Hazardous Materials Storage, Spill Records, Previous Phase I / Phase II ESA Reports, and Property-Use Restrictions.
State	Department of Ecology.	August 20, 2018.	Ms. Heidi Iha, Public Disclosure Coordinator.	(360) 407-6443.	Previous Phase I / Phase II ESA Reports, NOVs, and Spill Records.
County	Snohomish County Auditor's Office.	August 21, 2018.	Service Desk.	(425) 388-3388.	Recorded Liens and Deeds.
County	Snohomish County Assessor's Office.	August 21, 2018.	Service Desk.	(425) 388-3433.	Building and Parcel Map Information, and Recorded Liens.

Marysville City Hall (MCH): ESNW contacted MCH regarding development records, permits, zoning information, UST records, groundwater well records, critical areas records, and historical site use information. Available records on-file with MCH indicated that the subject site consists of one tax parcel (Snohomish County Parcel No. 30052100203800) comprising a total of approximately 21.43 acres of land area. MCH records indicate that the subject site was incorporated into the city of Marysville in 1971 and 1974. Additionally, the following records were available MCH: Application and Building Permit documents from 1985 to 1991, a Demolition Permit from February 19, 1991, Commercial – Mechanical Permits from 1999 and 2000, a Master Plan for 88th Street development, and maps of previous parcel divisions and annexations into the city of Marysville. Demolition and building permit documents discuss fire damaged areas at the previous Gott Construction building (currently occupied by Nordstrom Heating and Air), 3930 – 88th Street Northeast. The 88th Street Master Plan indicates that zoning at the subject site is currently “light industrial”, with a zoning code of “LI” and a zoning overlay of “mixed-use”. MCH records did not indicate environmental issues at the subject site. See Appendix K of this report to review the above-discussed records and an email correspondence from Ms. Lamoureux, MCH Planning Specialist.

Snohomish County Fire Marshal (SCFM): ESNW contacted SCFM for records pertaining to current or former aboveground and underground storage tanks (ASTs and USTs, respectively), hazardous materials spills, environmental cleanup orders, and recorded violations involving the subject site. SCFM has no records indicating environmental concerns at the subject site. See Appendix K of this report for email correspondence from Ms. Dervin, Snohomish County Records Specialist.

Snohomish County Health District (SCHD): ESNW contacted SCHD for records pertaining to septic systems, wells, ASTs, USTs, hazardous materials storage, spill records, previous Phase I / Phase II ESA reports, and property-use restrictions. SCHD has none of the above-listed records in connection with the subject site. The correspondence from Ms. Abdul-Qadir (SCHD Privacy and Public Records Officer) can be reviewed in Appendix K of this report.

Department of Ecology (Ecology): ESNW contacted Ecology for records pertaining to previous Phase I / Phase II ESA reports, NOVs, and spill records. Ecology sent ESNW several spill records associated with the Quil Ceda Tannery (3922 – 88th Street Northeast) and Metal Finishing Inc. (4000 – 88th Street Northeast) operations for the time period of 1997 to 2018. Additionally, hazardous waste production permits and related documents associated with the two above-listed on-site businesses were also provided to ESNW for review. The permit for hazardous waste production activities at the Quil Ceda Tannery became inactive in 2016. Although the Metal Finishing Inc. warehouse is vacant and no longer operating, its hazardous waste production permit remains active at this time. Based on Ecology's records, remnant soil contamination may exist at the former Quil Ceda Tannery and Metal Finishing Inc. buildings. This represents a REC for the subject site.

Snohomish County Auditor's Office: ESNW contacted the Snohomish County Auditor's Office for records pertaining to recorded liens and deeds at the subject site. Snohomish County Auditor's Office records indicate Quit Claim Deeds, Deeds, a financial Lien (with "Redhead Racing Ent."), Deeds of Trust, and an Assignment of Rents for the subject site from 2004 to 2013. No environmental issues, deed restrictions, or nuisances associated with the site were identified at the Snohomish County Auditor's Office.

Snohomish County Assessor's Office (SCAO): ESNW contacted SCAO for records pertaining to Building and Parcel Map Information, or Recorded Liens at the subject site. Records reviewed at SCAO revealed that the subject site consists of one tax parcel (Snohomish County Parcel No. 30052100203800) comprising a total of approximately 21.43 acres of land area. According to SCAO, "Matico LLC" is on record as the current owner of the subject site. SCAO records identify dates of construction for each of the site structures as follows: tannery operation building construction in 1946 (which conflicts with an Ecology record that lists operations as beginning in 1932); single-wide mobile home construction in 1972; hide storage building construction in 1973 (adjacent to operation building); tannery retail building construction in 1984 ("Dry County Distillery"); southeast warehouse construction in 1986 ("Metal Finishers Inc."); and central warehouse construction in 1986 ("Nordstrom Heating"). No environmental issues, deed restrictions, or nuisances/problems associated with the site were identified in records reviewed at SCAO (Appendix C).

4.0 HISTORICAL USE OF THE PROPERTY AND ADJOINING PROPERTIES

The history of the site was researched to identify obvious uses of the site from the present to first developed use (or back to 1940, whichever is earlier) from readily available resources. ESNW retrieved the historical information of the subject property from available resources referenced herein. The earliest historical record available covering the site area was a historical topographic map dated 1911. Other historical records provided site coverage following 1911. Historical records covering the site area prior to 1911 were unavailable. Table 4 (below) summarizes the availability of information reviewed during this assessment.

Table 4
Historical Sources

	Year(s) Available	Source
AERIAL PHOTOGRAPHS	1941, 1954, 1956, 1968, 1973, 1979, 1981, 1990, 2006, 2009, and 2017.	The EDR Aerial Photo Decade Package (EDR).
SANBORN FIRE INSURANCE MAPS	No coverage available for site.	The EDR Certified Sanborn Map Report.
CITY DIRECTORIES	1964-2014.	The EDR City Directory Image Report.
TOPOGRAPHIC MAPS	1911-2014.	The EDR Historical Topographic Map Report.
CHAIN-OF-TITLE REPORT		Not Provided.

4.1 AERIAL PHOTOGRAPHY

Historical aerial photographs were reviewed to evaluate past land use at the site and surrounding area. Aerial photographs providing coverage for 1941, 1954, 1956, 1968, 1973, 1979, 1981, 1990, 2006, 2009, and 2017 were made available for review by the EDR Aerial Photo Decade Package (see Appendix E). The aerial photographs reviewed for this assessment are listed below in Table 5.

Table 5
Aerial Photographs Reviewed

Year	Scale	Type	Quality
1941	1"=500'	Black and White	Poor
1954	1"=500'	Black and White	Fair
1956	1"=500'	Black and White	Very Poor
1968	1"=500'	Black and White	Poor
1973	1"=500'	Black and White	Fair
1979	1"=500'	Black and White	Fair
1981	1"=500'	InfraRed	Fair
1990	1"=500'	Black and White	Fair
2006	1"=500'	Color	Good
2009	1"=500'	Color	Good
2017	1"=500'	Color	Good

A summary of the aerial photograph review is presented below:

4.1.1 Subject Site

- Aerial photographs reviewed from 1941 to 1973 depict a large structure, associated with historical Quil Ceda Tannery operations, within the central-western portion of the subject site. Quilceda Creek flows along and with the western margin of the property. In 1968, additional attached structures associated with the Quil Ceda Tannery appear at the southeast side of the original structure. Moderately to densely forested areas appear in the remaining portions of the property (except a southeast clearing and areas immediately east and west [beginning in 1968] of the tannery buildings). By 1973, additional road access appears from State Avenue (east of the subject site).
- Aerial photographs reviewed from 1979 and 1981 depict a large warehouse (4000 – 88th Street Northeast) east of the tannery buildings (along the eastern margin of the site), single-family residential home and a detached accessory structure in the central portion of the site. Disturbed soil appears immediately south of the tannery buildings. Previous cleared areas appear re-vegetated.
- Aerial photographs reviewed from 1990 to 2017 depict a warehouse structure in the northeast corner of the subject site (3922 – 88th Street Northeast), formerly occupied by retail shop operations for the tannery. A few additional structures and fenced construction yard (less visible due to tree cover) also appear on the property, south of the northeast warehouse. Some attached building additions appear at the southeast warehouse (4000 – 88th Street Northeast). Bright blue deposits appear on the ground along the southern side of and at the northeast corner of the tannery buildings in aerial photographs from 2006 and/or 2009.

4.1.2 Surrounding Areas

- Aerial photographs reviewed from 1941 to 1956 depict 88th Street Northeast along the northern perimeter, Quilceda Creek and associated vegetated areas along the western perimeter, and a railroad track (and associated service road) and State Avenue beyond the eastern perimeter of the subject site. Remaining areas surrounding the subject site appear to be occupied by small agricultural and sporadic single-family residential home development.
- Aerial photographs reviewed from 1968 to 1990 depict increasingly dense commercial development along State Avenue.
- Aerial photographs reviewed from 2006 to 2017 depict increasingly dense commercial development along 88th Street Northeast.

Note: Aerial photographs only provide information on indications of land use, and no conclusions can be drawn from photographs alone. ESNW's review of available aerial photographs revealed obvious signs of disturbed soil (surrounding tannery buildings) and releases of chromium-impacted soil or water to the ground (aerial photographs from 2006 and 2009). No other obvious signs of spilling, disposal of hazardous materials or wastes, or illegal dumping were observed at the site in the above-reviewed aerial photographs. The historical aerial photograph discussion in the December 21, 2006 Phase I ESA report completed by TAI may slightly differ and may be referenced in Appendix L for further detail.

4.2 SANBORN FIRE INSURANCE MAPS

Sanborn fire insurance provides historical land use information for some metropolitan and small established towns. ESNW retained EDR-Sanborn, Inc. to search the nation's largest and most complete collection of Sanborn fire insurance maps covering the site area. Sanborn fire insurance map coverage was not available for this site (Appendix D).

4.3 CITY DIRECTORIES

ESNW retained EDR to review current and historical city directory listings. City directories from 1967 to 2014 were made available during production of the EDR City Directory Image Report (see Appendix F), which researched as far back as 1964. See below for a list of site occupants:

3812 – 88 th Street Northeast:	None listed.
3824 – 88 th Street Northeast:	Jody Sears (2014) Occupant Unknown (2010) Jody Jacob (2005) Chris Peters (1995, 1992)
3922 – 88 th Street Northeast:	Quil Ceda Tanning Co. Inc. (2014, 2010, 2005, 2000, 1995, 1992)
3930 – 88 th Street Northeast:	Jim and Cathy Investments, LLC (2010) Gott Construction Co. (1995)
4000 – 88 th Street Northeast:	Metal Finishing Inc. (2010, 2005, 2000) Hilker H. C. and Associates Inc. (1992)

No other site addresses associated with the subject site were listed in the city directories. Available city directory listings did not indicate the historical presence of either automobile maintenance facilities or dry-cleaning businesses. City directory listings from 1990 or earlier did not report any of the addresses that are known to be associated with the subject site.

4.4 HISTORICAL TOPOGRAPHIC MAP REVIEW

Historical topographic maps of the site area were made available by the EDR Historical Topographic Map Report (see Appendix G). The maps were published from 1911 through 2014. Topographic maps covering the site area prior to 1911 were not available for review.

Beginning with the first available topographic map (1911), a railroad track is present along the eastern perimeter of the subject site, and a creek and associated wetlands appear within the western margin of the property. A topographic map from 1956 depicts the first appearance of three site structures, at the end of a detached road accessed at the property's northeast corner. One additionally small detached structure appears in the topographic map from 1973. Topography at the site appears relatively unchanged over time, and no site usage was indicated on the topographic maps.

4.5 PREVIOUS ENVIRONMENTAL SITE ASSESSMENT REPORTS

- *Phase I Environmental Site Assessment Report*, Quil Ceda Tanning Company, 3824 – 88th Street Northeast, Marysville, Washington. Completed by Terra Associates, Inc., dated December 21, 2006.

In 2006, TAI described the property as a “mixed-use site that consists of a leather retail store [now occupied by Dry County Distillery], a tannery, a metal electro-plating facility, a construction contractor storage yard, and a single-family residence”, which encompasses the same 21.43 acres as the current subject site. The December 21, 2006 Phase I ESA report completed by TAI identified the following three RECs in connection with the subject site: the long-term use of fluids containing chromium on-site as part of the tanning operations; the past use of solvents and metal-bearing solutions (fluids) in the commercial building in the southeast corner of the site; and the surficial releases of petroleum hydrocarbons and accumulation of debris on the contractors tenant space in the northeast corner of the site. TAI indicated that historical tanning operations records of water management and practices were not well documented. The southeast commercial building was reportedly initially occupied by a fiberglass boat construction firm and subsequently occupied by a plating and metal coating business from approximately 1988 to 2006. Also, at the time of TAI's site reconnaissance visits (November 17th and December 11th, 2006), the northeast tenant space was observed to store several containers of used oil and large amounts of debris in exposed conditions. TAI identified no off-site facility-sourced soil or groundwater contamination that was determined to represent a REC for the subject site. No soil sampling or remediation was completed under supervision of TAI at the time of this previous Phase I ESA report. However, disposal of hazardous wastes (and wastewater) from the tannery operations and decontamination of the tannery facilities was completed by NRC Environmental Services, Inc. in 2016.

This 2006 Phase I ESA report and documentation of the above-discussed facility remediation and decontamination activities can be reviewed in Appendix L of this report. See below for discussion of a Subsurface Investigation Summary Report completed by Aspect Consulting for the subject site on December 7, 2016.

- *Subsurface Investigation Summary Report*, Metal Finishing Inc., 4000 – 88th Street Northeast, Marysville, Washington, Project No. 160157-01. Completed by Aspect Consulting, dated December 7, 2016.

This 2016 Subsurface Investigation Summary report described the property as being occupied by industrial/commercial use (Quil Ceda Tanning, Metal Finishing Inc., and Nordstrom Heating and Air). Although Aspect Consulting's 2016 report addresses the CSCSL listing for the Quil Ceda Tannery, the soil and groundwater sampling discussed in the report was limited to areas within the vicinity of the Metal Finishing Inc. warehouse and associated structures located at 4000 – 88th Street Northeast (upgradient from the Quil Ceda Tannery structures). Aspect Consulting completed a total of 25 soil borings and test pits at the subject site and analyzed soil and groundwater samples for the following constituents: total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and total metals. Groundwater samples were collected from four borings, beginning at the northeast corner of the building and trending southwest to a point approximately 120 feet west of the building's southwest corner. One REC was identified in connection with an isolated spot of arsenic concentrations in soil (91 mg/kg) exceeding the MTCA Method A arsenic CUL of 20 mg/kg. This elevated concentration of arsenic was identified in the "IB-4" boring at a depth of one-foot bgs beneath the slab of the "Still/Rectifier Building". Aspect Consulting reported that a separate boring was completed approximately two feet away for sample collection (at comparable depth) by another consultant. Reportedly, this nearby sample did not contain concentrations of arsenic in soil above laboratory reporting limits. No other analyzed constituents were reportedly present at concentrations exceeding applicable MTCA Method A CULs in soil or groundwater samples collected during this previous subsurface investigation.

It should be noted that a 2018 Ecology spill record for 4000 – 88th Street Northeast was identified during this Phase I ESA, which represents a potential additional REC for the subject site. See Section 3.2 for further discussion.

5.0 SITE RECONNAISSANCE

ESNW conducted a reconnaissance of the subject site and surrounding properties on August 21, 2018. Information obtained during the site reconnaissance was used to complete this assessment.

5.1 GENERAL SITE SETTING

The subject site is located southwest of the intersection between 88th Street Northeast and State Avenue, in Marysville, Washington. The approximate location of the property is illustrated on Plate 1 (Vicinity Map).

5.2 SITE OBSERVATIONS

The site is currently developed with a commercial retail building, one light industrial manufacturing warehouse, three commercial storage buildings, a single-wide mobile home facility, and detached garages, sheds, and carports constructed between 1946 and 1986 (according to SCAO documents). Remaining portions of the site consist of grass and tree-covered areas.

No obvious visual indication of outdoor hazardous material spills, stressed vegetation, or chemical/petroleum odors were noted by ESNW during the site reconnaissance. However, significant chemical and hazardous waste storage was observed at the property, including outdoor storage of two 55-gallon drums (one empty and one full) on soil west of 3930 – 88th Street Northeast. Additionally, significant concrete staining was observed in the structures associated with Quil Ceda Tanning operations and Metal Finishing Inc. operations. Sections 3.2 and 4.5 of this report discuss previous hazardous material spills in these areas.

Additional observations made during the site reconnaissance are presented in Table 6.

Table 6
Site Observations

General Observations	Remarks	Observed	Not Observed
Current use	Vacant tannery buildings, a vacant metal finishing warehouse (remnant chemical storage present), an operating heating and air conditioning service business, an operating distillery, and a single-wide residential mobile home.	X	

General Observations	Remarks	Observed	Not Observed
Current use likely to indicate RECs	Remnant storage of chemicals (prior to removal) at the southeast warehouse (4000 – 88th Street Northeast) represent the potential for releases to site soil and/or groundwater. Temporary outdoor storage of appliance parts and observed metal shavings on soil along the south side of the central warehouse (3930 – 88th Street Northeast) may indicate the potential for shallow releases of heavy metals to site soil. Additionally, outdoor remnant storage of two 55-gallon drums (including "White Cap Form Oil") in the field west of the central warehouse may indicate the potential for releases to site soil.	X	
Past use	Industrial operations, including: tanning hides, metal finishing, construction storage and rebar cutting, heating and air conditioning servicing operations, and alcohol distilling. See detailed list of previous site occupants in Appendix H of this report.	X	
Past use likely to indicate RECs	Several RECs associated with past use of the site were identified at the subject site during a 2006 Phase I ESA report and a subsequent 2016 subsurface investigation (Section 4.5). These RECs included: 1. "The long-term use of fluids containing chromium on-site as part of the tanning operations"; 2. "The past use of solvents and metal-bearing solutions (fluids) in the commercial building in the southeast corner of the site"; and 3. "The surficial releases of petroleum hydrocarbons and accumulation of debris on the contractors tenant space in the northeast corner of the site." 4. Additionally, concentrations of arsenic in soil exceeding the MTCA Method A arsenic CUL (20 mg/kg) was identified at one-foot bgs beneath a Metal Finishing Inc. structure during the 2016 subsurface investigation. See Section 8.1 for our recommendations involving these RECs. Finally, there is a potential that additional chromium releases to site soil occurred in 2018, according to Ecology spill records (Section 3.2 and Appendix J). This may represent a REC.	X	

General Observations	Remarks	Observed	Not Observed
Structures	• 3812 – 88th Street Northeast: Single-wide residential mobile home and attached covered storage areas. • 3824 – 88th Street Northeast: Currently vacant but formerly occupied by Quil Ceda Tanning hide treatment and production operations. One large warehouse, two attached hide drying and preparation rooms, and three small detached structures. • 3922 – 88th Street Northeast: Currently occupied by Dry County Distillery (formerly the retail shop and hide embossing/dying/storage areas for Quil Ceda Tanning). One large retail space with attached warehouse and a detached shed, connected to the main building by a covered area. • 3930 – 88th Street Northeast: Currently occupied by Nordstrom Heating and Air Inc. One retail/customer service space with an attached warehouse, an attached covered shed, a detached temporary metal disposal container, and a small detached shed (at the western perimeter of the lot). • 4000 – 88th Street Northeast: Currently vacant but formerly occupied by Metal Finishing Inc. One large warehouse, a detached “still/rectifier building”, a small attached “hazardous waste storage area” shed, and two attached wastewater treatment and/or chemical storage sheds (along the eastern perimeter of the warehouse).	X	
Roads	88 th Avenue Northeast runs along the northern perimeter of the subject site, and Sate Avenue runs north-to-south beyond the eastern perimeter of the subject site. Several paved and unpaved driveways and access roads are present in the northeastern and central portions of the property.	X	
Topography of site and surrounding area	The property is relatively level with a general slope to the south and approximately 30 feet of elevation drop along the western margin of the site, toward Quilceda Creek. The immediately surrounding topography generally slopes to the southwest.	X	
Aboveground storage tanks (ASTs)	Several large, empty metal drums (used for treatment and dyeing of animal hides) remain within Quil Ceda Tanning's former operations buildings. No heating fuel (or other) ASTs were observed at the subject site.		X

General Observations	Remarks	Observed	Not Observed
Asbestos-containing materials (ACMs) and lead	Given the age of the on-site structures, ACMs may exist at the property. Lead-based paints (LBP) may also be present.	X	
Wetlands	Wetland areas (delineated by others) exist along the western margin of the property, adjacent to Quilceda Creek.	X	
Below-grade vaults	None observed.		X
Burned or buried debris	Ecology spill records indicate that remnant chromium-treated animal hides may reportedly still be buried at the subject site. See Appendix J. Subsequent cleanup of the site is also recorded. However, no evidence was found of removal for reportedly buried animal hides. Burned debris from a former fire at 4000 – 88th Street Northeast was documented as being removed from the property on February 24, 2017. An additional fire reportedly occurred at 3930 – 88th Street Northeast prior to 1991. No evidence of remnant burned debris was identified at the site.	X	
Chemical storage	Several 55-gallon drums of ethanol are stored in the back room of the Dry County Distillery building (3922 – 88th Street Northeast); however, no signs of spills or concrete staining were observed. Several small compressed nitrogen and carbon dioxide tanks, propane tanks, a few gallons of gasoline (stored in upright, sealed containers), several small cans of lubricant, paint, and similar products were stored in the warehouse of the Nordstrom Heating and Air Inc. building (3930 – 88th Street Northeast). Additionally, a 55-gallon drum of "White Cap Form Oil" (a preservative) was observed on soil adjacent to a stormwater catch basin in the western margin of the enclosed lot. No signs of spills or concrete or soil staining were observed. Small amounts of metal shavings were observed in soil within the enclosed yard area. Several hundred gallons of cleaning solutions, additives for dye baths, and metal waste products in sealed drums and polymer containers (with secondary confinement) were observed in the Metal Finishing Inc. building (4000 – 88th Street Northeast). Additionally, a five-gallon container of hydraulic oil, 55-gallon drums of sodium hydroxide, and various corrosive liquids (including Iridite 14-2) were observed stored directly on concrete slabs of detached and attached outbuildings. Significant concrete staining was observed in all structures, especially within areas formerly used for plating/coating/painting, still/rectifying, and wastewater treatment.	X	

General Observations	Remarks	Observed	Not Observed
Chemical mixing areas	Enclosed areas used for wastewater mixing and treatment and paint mixing were observed in the Metal Finishing Inc. building (4000 – 88th Street Northeast) and were surrounded by concrete berms and deep secondary containment (with concrete slabs). Former concrete-lined hydrated lime bath tubs and several large, empty metal drums (used for treatment and dyeing of animal hides) remain within Quil Ceda Tanning's former operations buildings.	X	
Discolored soil or water	None observed during our site reconnaissance. However, during a geotechnical investigation site visit (completed separately by ESNW in 2018), a thin layer of white-colored deposits or stained soil with a pungent odor was identified at an approximate depth of four feet bgs along the southern side of the main tannery operations building.	X	
Ditches or streams	Quilceda Creek runs along and through the western margin of the property.	X	
Drains and piping (e.g. floor drains, floor trenches, bay drains, sand traps, grease traps)	Floor drains and trenches were observed, which reportedly lead to aboveground wastewater treatment tanks along the west side of the former Quil Ceda Tanning operations buildings.	X	
Drums	See "Chemical storage" section of this table.	X	
Electrical or hydraulic equipment (polychlorinated biphenyls [PCBs])	Pole-mounted electrical transformers exist along 88th Avenue Northeast and throughout developed areas of the subject site, where aboveground electrical services are supplied to site structures. Additionally, an aboveground hydraulic lift (with minor dark staining) is present within the northern portion of the former Quil Ceda Tanning operations buildings. No obvious signs of spills were observed (see Appendix B – Site Photos).	X	
Fill dirt from an unknown source.	Observed topography at the site and historical topographic maps covering the site indicate that no significant amount of fill dirt has been placed at the property. However, reworked or graded native soil is often referred to as "fill" and will be present in areas of building foundations, developed roads, and installed utilities.		X
Hazardous chemical and petroleum products in connection with <i>known</i> use.	See "Chemical storage" section of this table.	X	
Hazardous chemical and petroleum products in connection with <i>unknown</i> use.	It is unknown if the contents of the 55-gallon "White Cap Form Oil" drum (building materials preservative) at 3930 – 88 th Avenue Northeast were applied at the property or simply stored at the property during former occupation by various construction companies.	X	

General Observations	Remarks	Observed	Not Observed
Non-hazardous containers with contents	None observed.		X
Hazardous waste storage	Hazardous waste/byproducts of former coating / plating / painting activities at the Metal Finishing Inc. building (4000 – 88 th Street Northeast) remain at the property. These hazardous wastes were observed to be labeled and stored in sealed containers, with secondary confinement and on top of a concrete slab within covered structures. No signs of spills or leaks from current hazardous waste storage containers were observed.	X	
Heating and cooling system and fuel source	Natural gas presently services several of the on-site structures, aside from the single-wide residential mobile home, which is heated by an electric forced hot air system.	X	
Industrial waste treatment equipment	pH regulating equipment, associated with wastewater from former Metal Finishing Inc. operations, was observed in attached sheds along the eastern side of the Metal Finishing Inc. warehouse.	X	
Loading and unloading areas	An unloading area for former Quil Ceda Tanning waste pickup was observed at the southwest perimeter of the Quil Ceda Tanning former operations warehouse. Additionally, a loading area for incoming materials deliveries or waste materials pickup is present along the north side of the former Metal Finishing Inc. building.	X	
Odors	None observed.		X
Pits, ponds, or lagoons	None presently observed, but a previous Phase I ESA identified a pit during review of historical aerial photographs (Appendix L).	X	
Pools of liquid	None observed.		X
Process waste water	Treated wastewater from both the former Quil Ceda Tanning and Metal Finishing Inc. operations was reportedly discharged (most recently, by permit) to the Marysville municipal sanitary sewer system. The discharge point for Metal Finishing Inc. is unknown at this time and does not appear to be identified in former records covering the subject site. However, a discharge catch basin for the former Quil Ceda Tanning wastewater is present at the northeast corner of the existing hide treatment warehouse structures (currently overgrown by blackberry bushes).	X	
Sanitary sewer system	Municipal sewer is reportedly serviced to the property.	X	
Septic system (e.g. tank and leach fields)	None observed or recorded.		X
Soil piles	None observed.		X

General Observations	Remarks	Observed	Not Observed
Solid waste/evidence of unauthorized dumping	None observed.		X
Stained pavement, soil or concrete	Significantly stained concrete was observed in the former Quil Ceda Tanning and Metal Finishing Inc. operations buildings.	X	
Storm drains/catch basins	Storm drains are present in the asphalt-paved roads that lead to the Metal Finishing Inc. warehouse, within the gravel-paved road leading to the Quil Ceda Tanning hide treatment warehouse structures, and along the roads surrounding the subject site.	X	
Stressed vegetation	None observed.		X
Sumps and clarifiers	None observed.		X
Surface water	None observed.		X
Underground storage tank(s) (including heating oil tanks) (USTs)	Abandoned heating fuel USTs may exist at the site but no vent pipes or fill ports were identified. Additionally, Ecology records indicate that three heating fuel USTs (steel) and one "hazardous substance" UST (concrete) may remain at the property (Section 3.2).	X	
Unidentified substance containers	None observed.		X
Utilities	Municipal water, electrical, natural gas, sanitary sewer, and other buried utilities are present or stubbed to the site.	X	
Waste water discharge	None observed visually during site reconnaissance, but reportedly a catch basin for wastewater discharge is present at the northeast corner of the Quil Ceda Tanning operations warehouse structures (presently overgrown by blackberry bushes).	X	
Water supplies (<i>potable and process</i>)	Municipal water is present.	X	
Geotechnical/environmental soil borings	Several environmental borings advanced at the on-site Metal Finishing Inc. building in 2016.	X	
Wells (<i>irrigation, monitoring, or domestic</i>)	None observed or recorded.		X
Wells (<i>dry</i>)	None observed or recorded.		X
Wells (<i>oil and gas</i>)	Two approximate six-inch diameter well-like structures, one with the lid removed and laid to the side (lids labeled "gas"), were present at the northeast corner of the subject site. The property owner reportedly had no knowledge of these structures and will visit the property on October 3, 2018. Should the property owner provide information to ESNW confirming that these structures are gas wells, ESNW can provide an addendum letter to this report.		X

5.3 DESCRIPTION OF PROPERTY STRUCTURES/IMPROVEMENTS

Several light industrial warehouse and shed structures remain at the subject site, in addition to one single-wide residential mobile home (see “Structures” section of Table 6). Current structures are heated by systems fueled by natural gas or by electrical forced hot air systems.

Municipal water, electrical, natural gas, sanitary sewer, and other buried utilities are available to or currently service the property.

5.4 CURRENT USES OF SURROUNDING PROPERTIES

ESNW conducted a drive-by survey of the properties surrounding the site on the same day as the site reconnaissance (August 21, 2018). A summary of the surrounding properties is presented in Table 7 (see below).

Table 7
Surrounding Properties

Direction	Land Use Description
NORTH	88 th Street Northeast, with forested and undeveloped areas and Clearcreek Contractors Inc. warehouse beyond.
SOUTH	Quilceda Creek and single-family residential homes.
EAST	Railroad tracks and associated unpaved service road, with State Avenue, a cemetery, single-family and mobile homes, a bar, and automobile maintenance businesses beyond.
WEST	Quilceda Creek, with forested and undeveloped areas, a restaurant, and moderately dense single-family residential homes beyond.

5.5 GEOLOGY AND GROUNDWATER

According to EDR’s Geoscheck Soils Report (see Appendix A) and the Web Soil Survey (WSS) online resource maintained by the Natural Resources Conservation Service (NRCS), soils on the subject property and surrounding areas are generally classified as Ragnar fine sandy loam, which is within Hydrologic Soil Group A and classified as “well-drained”. Areas immediately within and adjacent to Quilceda Creek (western margin of the subject site) are classified as Norma loam (Hydrologic Soil Group D, classified as “poorly drained”) and Puget silty clay loam (Hydrologic Soil Group C, also classified as “poorly drained”).

Based upon the topography of the site and surrounding area, shallow groundwater flow direction is generally inferred to the southwest or locally inferred to the west (toward Quilceda Creek).

A review of well logs available from the Washington State Department of Ecology (Ecology) and the United States Geological Survey (USGS) indicated that there are no groundwater monitoring wells identified at the subject site. However, Ecology records were identified for several environmental borings advanced at the on-site Metal Finishing Inc. building in 2016. Some of these records are included in Appendix M of this report for review.

6.0 INTERVIEWS

As part of the site assessment process, ESNW interviewed the site owner, Mr. Michael Warden, and several local government representatives to obtain information about the current and former use of the site, as well as any potential environmental issues associated with the site.

Interviews with local government representatives were discussed in detail in Section 3.2 on this report. Completed environmental questionnaires are included in Appendix H of this report.

6.1 SITE OWNER REPRESENTATIVE

Property information obtained from interviewing Mr. Warden is described below:

- Mr. Warden indicated he has been associated with the property for approximately twelve years (since 2006). He provided a detailed list of current and former site occupants, going back to the site's initial development (see Appendix H). According to Mr. Warden, tanning operations occurred at the subject site from 1946 to 2011. Metal coating/painting operations (4000 – 88th Street Northeast) reportedly occurred at the subject site from approximately 1988 to 2006. Additionally, according to the attached document, 3930 – 88th Street Northeast was occupied by construction companies between approximately 1997 and 2011.
- Mr. Warden indicated the presence of environmental site assessment reports, environmental compliance audit reports, government agency correspondence regarding past violations, and hazardous waste generation reports in connection with the subject site. Mr. Warden accordingly shared a 2006 Phase I ESA report, Ecology correspondences and records of NRC Environmental Services cleanup and disposal activities at the Quil Ceda Tanning operations buildings for the time period of 2012 through 2016, a 2016 [Limited] Subsurface Investigation report, and a 2018 Settlement Agreement between Quil Ceda Tanning Company, Inc. (and Michael Warden) and Ecology (Appendix L). See further discussion of the previous Phase I ESA and Subsurface Investigation reports in Section 4.5.
- According to the most recent NRC Environmental Services (NRC) Report of Activities for the subject site (completed on April 14, 2016), NRC pressure washed residual staining from three rooms of the tannery buildings, captured the rinsate with a vacuum truck, and transferred all cleanings and rinsate into one 275-gallon liquid tote, which was sampled and analyzed for waste profiling prior to off-site transport and disposal at Waste Management. NRC reported that all cleanup and waste disposal work completed at the Quil Ceda Tanning buildings in 2016 was performed in "strict compliance with all local, state and federal regulations, with a special emphasis placed on safety and protection to the environment". See Appendix L to review the above-discussed document.

- Mr. Warden indicated that a professional firm is presently removing chemicals and equipment from the buildings formerly occupied by Metal Finishing Inc.
- Mr. Warden indicated that no drinking wells, oil/gas wells, or oil/gas vents are located on-site. However, a Puget Sound Energy natural gas pipeline and vent pipe is present adjacent to the eastern perimeter of the subject site, apparently running parallel to the off-site railroad tracks (as observed during site reconnaissance). Additionally, two structures resembling six-inch diameter steel wells (with lids labeled "gas") were observed within the northeast corner of the subject site during site reconnaissance. Mr. Warden is reportedly visiting the property on October 3, 2018 to verify the purpose of these structures and confirm whether they are located within the legal boundaries of the subject site. Should Mr. Warden provide ESNW with information confirming that these structures are gas wells, ESNW can provide an addendum letter to this report. No evidence of domestic wells, or other evidence of the above-listed wells or vents, was observed at the subject site during our site reconnaissance.
- Mr. Warden indicated, to his knowledge, the property has never been and is not currently serviced by septic systems. Additionally, he indicated that the stormwater system at the site is serviced through the City of Marysville.
- Mr. Warden indicated that agricultural activities and/or pesticide mixing or applications were not historically performed at the subject site.

6.2 LOCAL GOVERNMENT OFFICIALS

Various local agencies were contacted regarding site information, as discussed in Section 3.2. Records reviewed with MCH, SCFM, Snohomish County Auditor's Office, and SCAO did not reportedly contain indications of environmental concerns at the subject site. However, Ecology (and the property owner) provided ESNW with several records indicating the presence of HRECs and potential current RECs at the subject site. See Sections 3.2, 4.5, 6.1, and 7.1 of this report for further discussion.

7.0 EVALUATIONS

7.1 FINDINGS AND CONCLUSIONS

We have performed this Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM Practice E1527-13 for the site located southwest of the intersection between 88th Street Northeast and State Avenue, in Marysville, Washington (see Vicinity Map – Plate 1). Any exceptions to, or deletions from, this practice are described in Section 1.5 and 1.6 of this report. This assessment has revealed evidence of several HRECs, current RECs, and a potential off-site environmental concern. See below for further discussion.

The following addresses are listed in connection with the subject property: 3812, 3824, 3922, 3930, and 4000 – 88th Street Northeast, in Marysville, Washington. The property consists of one tax parcel (Snohomish County Parcel No. 30052100203800) comprising a total of approximately 21.43 acres of land area (see Site Plan – Plate 2). The site is currently developed with a commercial retail building, one light industrial manufacturing warehouse, three commercial storage buildings, a single-wide mobile home facility, and detached garages, sheds, and carports constructed between 1946 and 1986 (according to SCAO documents). Remaining portions of the site consist of grass and tree-covered areas. See below for detailed discussion of former and current business occupants at the subject site.

The subject site was formerly occupied by Quil Ceda Tanning (and one other company – Jansha Tanning Company) for treatment, production, embossing and/or dying, and sale of animal hides for the approximate time period of 1946 to 2011 (3824 – 88th Street Northeast). Metal coating and painting activities (completed by Metal Finishing Inc. and prior companies) reportedly occurred at the property from approximately 1988 to 2006 (4000 – 88th Street Northeast). Additionally, from 1997 to 2011, various construction companies (specifically JR Construction and, subsequently, Gott Construction) occupied the structures and associated fenced lot at 3930 – 88th Street Northeast. During our site reconnaissance, the property owner verbally reported that previous construction company occupants stored empty heating fuel tanks at the property following removal from off-site construction projects and/or completed rebar cutting activities with electric-powered cutting equipment.

Presently, the former Quil Ceda Tanning retail store is occupied by Dry County Distillery for production and sale of alcohol (3922 – 88th Street Northeast). Also, the structures and associated fenced lot at 3930 – 88th Street Northeast are now occupied by Nordstrom Heating and Air for the sale and/or maintenance of heating and air conditioning units. Finally, one single-wide residential mobile home is present in the central portion of the subject site (3812 – 88th Street Northeast). Remaining structures at the property are currently vacant.

No obvious visual indication of outdoor hazardous material spills, stressed vegetation, and/or chemical/petroleum odors were noted by ESNW during the site reconnaissance. However, significant chemical and hazardous waste storage was observed at the property, including outdoor storage of two 55-gallon drums (one empty and one full) on soil west of 3930 – 88th Street Northeast. Additionally, significant concrete staining was observed in the structures associated with Quil Ceda Tanning operations and Metal Finishing Inc. operations. There is potential for historical releases of chemicals to site soil in areas of current and former outdoor chemical storage, which represents a REC for the property. See Table 6 of this report for further discussion of site observations.

Three heating fuel steel USTs and one “hazardous substance” concrete UST are listed in Ecology’s records for the subject site. These USTs were reportedly installed in 1964, and no record was identified indicating UST removal following an “exempt” status update in 1996. No ASTs were listed on the regulatory databases for the subject property. Several large, empty metal drums and concrete-lined below-grade tubs (used for treatment and dying of animal hides) remain within Quil Ceda Tanning’s former operations buildings. However, no ASTs or fill ports/vent pipes associated with potential abandoned heating fuel or hazardous substance USTs were observed at the property during our site reconnaissance. Based on Ecology’s records and the age of the on-site structures, there is potential that abandoned heating fuel (and/or hazardous substance) USTs remain at the property. See Appendix J to review Ecology’s records.

The EDR report identified the subject site on Federal, State, and/or local regulatory databases in connection with several different addresses, businesses, and/or sources of historical soil contamination at the property. Specifically, Spills and CSCSL regulatory databases indicated the presence of chromium-impacted soil at concentrations above Ecology’s MTCA Method A chromium CUL. A limited Subsurface Investigation, completed by Aspect Consulting, LLC in 2016 at the buildings and surrounding lot formerly occupied by Metal Finishing Inc., identified no concentrations of chromium III in soil exceeding the MTCA Method A chromium CUL and no detectable concentrations of chromium VI in soil. However, one localized area of soil reportedly contained concentrations of arsenic exceeding the MTCA Method A arsenic CUL. Also, a 2018 Spills listing for Metal Finishing Inc. indicates additional releases of chromium-impacted wastewater to site soil following the 2016 limited subsurface investigation completed by Aspect Consulting, LLC. Additionally, Spills listings for Quil Ceda Tanning and CSCSL records of chromium concentrations in soil that exceed the MTCA Method A chromium CUL, as well as the lack of recorded soil and/or groundwater sampling around the Quil Ceda Tanning operations buildings, indicates a separate REC at the property.

Section 3.1.1 discusses regulatory database listings for the subject site. Section 4.5 of this report discusses previous Phase I ESA and [Limited] Subsurface Investigation report findings, and Section 6.1 discusses records of some former cleanup and waste disposal at the Quil Ceda Tanning operations buildings. Appendix J includes Ecology Spills, CSCSL, UST, and hazardous waste records for the subject site. Appendix L includes previous Phase I ESA and [Limited] Subsurface Investigation reports (among others).

The EDR report also identified several nearby properties on the Federal, State, and/or local regulatory databases. The "Jiffy Lube Marysville" site (8417 State Avenue) is listed on the CSCSL and UST regulatory databases (among others) in connection with diesel-contamination of soil at concentrations reportedly exceeding the MTCA Method A CUL of 2,000 mg/kg. As the "Jiffy Lube Marysville" facility is located within 200 feet east of and upgradient (along the inferred hydraulic groundwater gradient) from the subject site, and there is no available record of remediation being completed at the facility, there is potential for shallow, perched groundwater to interact with remnant soil contamination and allow contaminants to migrate toward the subject site.

However, given the lack of recorded soil or groundwater contamination at the remaining off-site facilities, the nature of the listings, the distance between these remaining facilities and the subject site, an NFA determination from Ecology, and/or the present of a hydraulic groundwater barrier, the remaining off-site facilities do not represent an environmental concern for the subject site. Section 3.1.2 discusses regulatory database listings for nearby off-site facilities.

The reconnaissance of the subject property and adjacent properties, a review of regulatory lists and files, a review of the subject property history, and interviews with knowledgeable persons revealed evidence of several HRECs, current RECs, and a potential off-site environmental concern. Specifically, identified HRECs, RECs, and a potential off-site environmental concern consist of the following:

1. Long-term use and reported releases of fluids containing chromium on-site as part of historical tanning operations (HREC and potential current REC) and potential remnant buried hides (treated with chromium) or other waste byproducts from historical tanning operations (potential current REC).
2. Past use and reported past releases of solvents and metal-bearing (including chromium) solutions (fluids) in the commercial buildings in the southeast corner of the site (HREC); identified area of arsenic in soil exceeding the MTCA Method A arsenic CUL (REC); and more recent 2018 spill record indicating release of chromium wastewater to site soil (REC).
3. "The surficial releases of petroleum hydrocarbons and accumulation of debris on the contractors tenant space in the northeast corner of the site," as identified in the 2006 Phase I ESA report completed by Aspect Consulting, LLC (REC).
4. Potential abandoned heating fuel and/or "hazardous substance" USTs at the property, which may have released heating fuel and/or "hazardous substances" to site soil (potential current REC).
5. Remnant diesel-contaminated soil at the "Jiffy Lube Marysville" property (located at 8417 State Avenue, east of and contiguous to the subject site) may interact with shallow perched groundwater, allowing for migration of contaminants toward the subject site (potential environmental concern).

Please see Section 8.1 of this report for overall recommendations regarding the subject site.

7.2 ADDITIONAL SERVICES

This Phase I ESA did not include additional services related to business environmental risk considerations, such as asbestos-containing materials (ACMs), lead-based paints (LBPs), radon, polychlorinated biphenyls (PCBs), lead in drinking water, wetland, investigations/delineations, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety ecological resources, threatened/endangered species, mold, indoor air quality, high voltage power lines, or any other considerations not mentioned here.

7.3 QUALIFICATIONS AND STATEMENT OF ENVIRONMENTAL PROFESSIONALS

Ms. Jessica D. Babb of ESNW, a professional experienced with environmental site assessments and a State of Washington Licensed Geologist-in-Training, conducted this Phase I Environmental Site Assessment. Ms. Babb has over two-and-one-half years of experience in the environmental industry, with portions of that time conducting and reviewing Phase I and Phase II Environmental Site Assessments.

Mr. Ted W. Sykes of ESNW, a professional experienced with environmental site assessments and a State of California Registered Environmental Assessor, reviewed this Phase I Environmental Site Assessment Report. Mr. Sykes has 20 years of experience in the environmental industry, with significant portions of that time conducting and reviewing Phase I and Phase II Environmental Site Assessments.

Ms. Babb and Mr. Sykes of ESNW declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental professional as defined in Section 312.10 of 40 CFR 312. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed all the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

8.0 NON-SCOPE SERVICES

8.1 RECOMMENDATIONS

As discussed in Section 7.1 of this report, this assessment revealed evidence of several HRECs and RECs (as defined by ASTM practice E1527-13), in addition to a potential off-site environmental concern, in connection with the subject site.

Based on the results of this investigation, ESNW makes the following recommendations:

1. The client should consider completing a limited Phase II ESA soil sampling and/or shallow groundwater sampling investigation to identify the potential for chromium (or other heavy metals or solvents associated with past metal finishing and tanning operations) to remain in site soil and/or groundwater at concentrations exceeding applicable MTCA Method A CULs. Also, although there is record of removal of buried or piled animal hides (and/or solid byproducts) from the Quil Ceda Tanning operations buildings was recorded by NRC Environmental Services, LLC (Appendix L), no photos or maps indicating areas of cleanup and waste removal were provided to ESNW for review. The client may also consider including investigation into the potential for remnant and buried chromium-treated animal hides.

Investigation completed at the buildings formerly operated by Metal Finishing Inc. may be completed at the location of the reported 2018 chromium wastewater spill, given previous recent investigation by Aspect Consulting, LLC in other locations around the southeast warehouse buildings.

Additionally, this limited Phase II ESA may include investigation of the potential for the off-site "Jiffy Lube Marysville" property to have impacted shallow groundwater along the eastern margin (southeast corner) of the subject site. The cleanup details for this off-site property can be reviewed at the following Ecology website: <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=4581>. Previous limited Phase II ESA sampling activities were completed at the "Jiffy Lube Marysville" property in 2007; however, although groundwater was presumed to be at a depth of approximately 20 feet bgs (only five feet below the lowest investigated depth), groundwater was never sampled and analyzed for heavy oil-range hydrocarbons and/or cadmium. Given the nature of the constituents of concern and low volatilizing nature of heavy oil-range hydrocarbons, there is low potential for the "Jiffy Lube Marysville" site to represent an environmental concern.

Finally, this limited Phase II ESA should include soil sampling within the fenced yard at 3930 – 88th Street Northeast to address the potential for petroleum and/or heavy metal contamination of soil to exceed applicable MTCA Method A CULs (from former construction yard storage activities and operations).

2. Given Ecology's UST records for the property and the age of remnant structures at the subject site (reportedly constructed between 1946 and 1986), there is potential for abandoned heating fuel USTs to remain at the property. The client may consider completing a geophysical investigation at the site in order to search for potential abandoned heating fuel USTs.

Any USTs encountered on the property during or prior to site redevelopment and construction activities should be decommissioned (and/or removed) in accordance with Federal and local requirements. Additionally, if any visually impaired soil is observed during site redevelopment and construction activities (including UST removal), then the soil should be sampled, analyzed, and disposed of properly.

3. No evidence of domestic or monitoring wells was identified at the subject site during this Phase I ESA. However, two structures resembling six-inch diameter steel wells (lid labeled "gas") were observed in the vicinity of the subject site's northeast corner. As discussed in Section 6.1, Mr. Warden is reportedly visiting the property on October 3, 2018 to verify the purpose of these structures and confirm whether they are located within the legal boundaries of the subject site. Should Mr. Warden provide ESNW with information confirming that these structures are gas wells, ESNW can provide an addendum letter to this report. Any undocumented wells encountered on the property during or prior to site redevelopment and construction activities should be decommissioned in accordance with Federal and local requirements.
4. ACM and LBP surveys and abatement documents were not identified during this Phase I ESA. Given the age of the on-site structures, the client should complete a survey of the remnant building materials for ACMs and LBPs and abate any identified ACMs and/or LBPs prior to demolition debris removal.
5. Septic systems are not recorded or reported to exist at the property. However, should any undocumented septic systems be encountered on the property during redevelopment activities, they should be pumped out by a licensed septic tank service contractor and removed from the site.

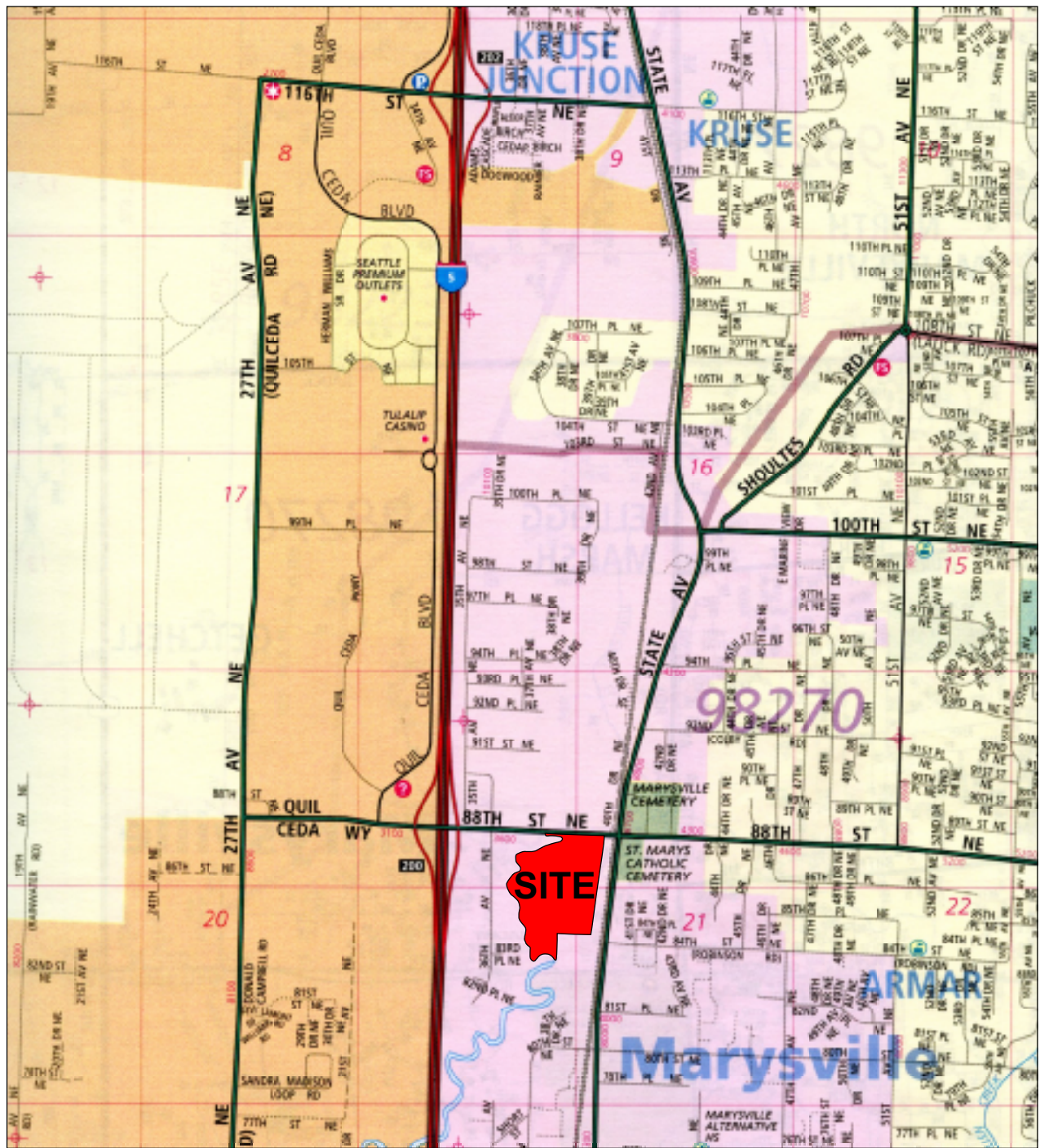
9.0 REFERENCES

1. American Society for Testing and Materials, 2013, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, Designation E1527-13.
2. Environmental Data Resources Reports, Marysville Property, 3824 – 88th Street Northeast, Marysville, Washington 98270. Report ID: 5385403.2s, dated August 7, 2018.
3. Property Parcel Records,
<http://gismaps.snoco.org/Html5Viewer/Index.html?viewer=pdsmapportal>.
4. Snohomish County Assessor's Office, 3000 Rockefeller Avenue, M/S 510, Everett, Washington 98201-4046.
5. Snohomish County Auditor's Office, 3000 Rockefeller Avenue, 1st Floor – Robert J. Drewel Building, Everett, Washington 98201-4046.
6. Marysville City Hall, 80 Columbia Avenue, Marysville, Washington 98270.
7. Snohomish County Fire Marshal, 3000 Rockefeller Avenue, M/S 604, Everett, Washington 98201-4046.
8. Snohomish County Health District, 3020 Rucker Avenue, Everett, Washington 98201.
9. Web Soil Survey (WSS) online resource maintained by the Natural Resources Conservation Service (NRCS) under the United States Department of Agriculture (USDA).
10. Department of Ecology, Northwest Regional Office, 3190 – 160th Avenue Southeast, Bellevue, Washington 98008.
11. Department of Ecology, Headquarters, 300 Desmond Drive Southeast, Lacey, Washington 98503.
12. Well Licensing Office, Washington Department of Ecology, Olympia, Washington.

Additional sources are referenced separately in the report text.

Plates

ES-6271.01



Reference:
Snohomish County, Washington
Map 356
By The Thomas Guide
Rand McNally
32nd Edition



NOTE: This plate may contain areas of color. ESNW cannot be responsible for any subsequent misinterpretation of the information resulting from black & white reproductions of this plate.



Earth Solutions NW LLC

Geotechnical Engineering, Construction
Observation/Testing and Environmental Services

Vicinity Map
Marysville Property
Marysville, Washington

Drwn. CAM

Date 08/31/2018

Proj. No. 6271.01

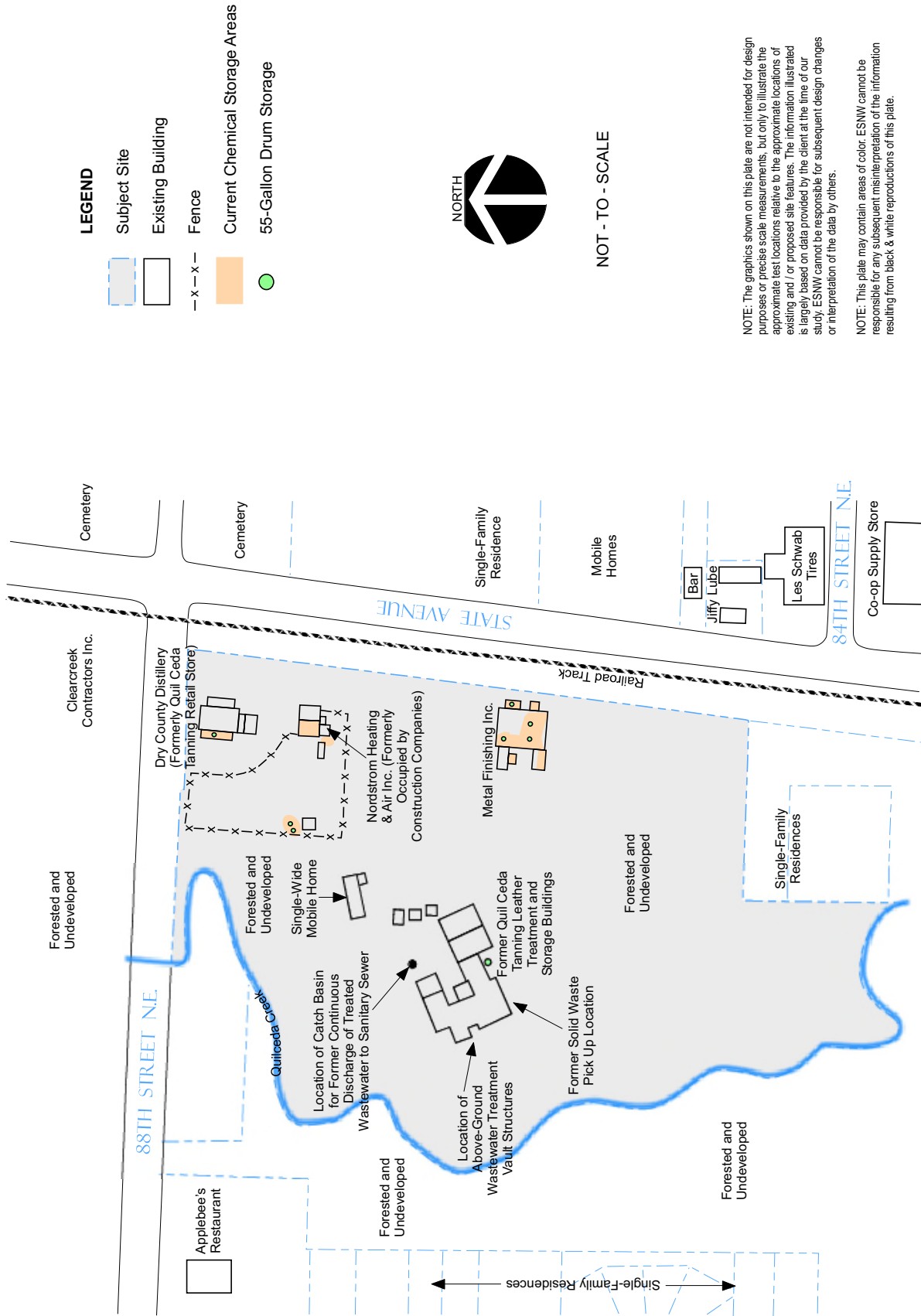
Checked JDB

Date Aug. 2018

Plate 1

NOTE: The graphics shown on this plate are not intended for design purposes or precise scale measurements, but only to illustrate the approximate site locations relative to the approximate locations of existing and / or proposed site features. The information illustrated is largely based on data provided by the client at the time of our study. ENSW cannot be responsible for subsequent design changes or interpretation of the data by others.

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Appendix A
The EDR Radius Map Report with GeoCheck
ES-6271.01

Marysville Property

3824 88th St NE

Marysville, WA 98270

Inquiry Number: 5385403.2s

August 07, 2018

The EDR Radius Map™ Report with GeoCheck®



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
Executive Summary	ES1
Overview Map	2
Detail Map	3
Map Findings Summary	4
Map Findings	8
Orphan Summary	569
Government Records Searched/Data Currency Tracking	GR-1
 <u>GEOCHECK ADDENDUM</u>	
Physical Setting Source Addendum	A-1
Physical Setting Source Summary	A-2
Physical Setting SSURGO Soil Map	A-5
Physical Setting Source Map	A-11
Physical Setting Source Map Findings	A-13
Physical Setting Source Records Searched	PSGR-1

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13), the ASTM Standard Practice for Environmental Site Assessments for Forestland or Rural Property (E 2247-16), the ASTM Standard Practice for Limited Environmental Due Diligence: Transaction Screen Process (E 1528-14) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

3824 88TH ST NE
MARYSVILLE, WA 98270

COORDINATES

Latitude (North):	48.0737970 - 48° 4' 25.66"
Longitude (West):	122.1784180 - 122° 10' 42.30"
Universal Transverse Mercator:	Zone 10
UTM X (Meters):	561200.6
UTM Y (Meters):	5324610.0
Elevation:	44 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map:	6006526 MARYSVILLE, WA
Version Date:	2014

AERIAL PHOTOGRAPHY IN THIS REPORT

Portions of Photo from:	20150928, 20150825
Source:	USDA

MAPPED SITES SUMMARY

Target Property Address:
3824 88TH ST NE
MARYSVILLE, WA 98270

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
A1	METAL FINISHING INC	4000 88TH ST NE	RCRA-LQG, WA ALLSITES, WA SPILLS, FINDS, ECHO, CA...		TP
A2	QUIL CEDA TANNING	3922 88TH ST NE	WA CSCSL, WA ALLSITES, WA SPILLS, WA MANIFEST		TP
A3	QUIL CEDA TANNING CO	3812 88TH ST NE	FTTS, HIST FTTS		TP
A4	QUIL CEDA TANNING	3922 88TH ST NE	RCRA-LQG, FINDS, ECHO		TP
A5	QUIL CEDA TANNING CO	T30N R5 S21	FINDS	Higher	1 ft.
B6	ATT MOBILITY MARYSVI	3926 88TH ST NE	FINDS	Higher	4, 0.001,
B7	ATT MOBILITY MARYSVI	3926 88TH ST NE	WA ALLSITES	Higher	4, 0.001,
8	MILLING SPECIALTIES	8430 STATE ST	WA ALLSITES, RCRA NonGen / NLR	Higher	39, 0.007, SSE
B9	CLEARCREEK CONTRACTO	3919 88TH ST NE	WA ALLSITES, FINDS, ECHO, WA MANIFEST	Higher	119, 0.023, NNE
B10	CLEARCREEK CONTRACTO	3919 88TH ST NE	RCRA NonGen / NLR	Higher	119, 0.023, NNE
11	GRANGE SUPPLY INC	84TH & STATE	EDR Hist Auto	Higher	207, 0.039, SE
12	JIFFY LUBE MARYSVILL	8417 STATE AVE	WA CSCSL, WA UST, WA ALLSITES, RCRA NonGen / NLR	Higher	226, 0.043, SE
13	QUIL CEDA TANNING CO	T30N R5 S21	WA UST, WA ALLSITES	Higher	306, 0.058, NE
C14	QUILCEDA 76	3608 88TH ST NE	EDR Hist Auto	Higher	528, 0.100, NW
C15	BIGFOOT PROPERTIES X	3608 88TH ST NE	WA ALLSITES, WA SPILLS, WA Financial Assurance	Higher	528, 0.100, NW
C16	BIGFOOT PROPERTIES X	3608 88TH ST NE	WA UST	Higher	528, 0.100, NW
C17	7-ELEVEN STORE 2306-	3609 88TH ST NE	WA UST	Higher	568, 0.108, NW
C18	7 ELEVEN STORE 23063	3609 88TH ST NE	WA ALLSITES, WA Financial Assurance	Higher	568, 0.108, NW
D19	HAGGEN OPCO NORTH LL	3711 88TH ST NE	RCRA-CESQG	Higher	716, 0.136, NNW
D20	HAGGEN OPCO NORTH LL	3711 88TH ST NE	WA ALLSITES, WA MANIFEST	Higher	716, 0.136, NNW
C21	88TH ST TEXACO FOODM	3506 88TH ST NE	WA ALLSITES, WA Financial Assurance	Higher	733, 0.139, WNW
C22	88TH ST SHELL FOOD-M	3506 88TH ST NE	WA UST	Higher	733, 0.139, WNW
23	GRANGE SUPPLY INC CO	8225 40TH AVE N E	WA UST, WA ALLSITES, WA CSCSL NFA	Higher	872, 0.165, SSE
24	CHARLIES STATE AVENU	9015 STATE AVE	RCRA-CESQG, WA ALLSITES, WA MANIFEST	Higher	907, 0.172, NNE
25	TDC 88TH STREET RETA		WA ALLSITES	Higher	964, 0.183, NW
26	B2B ENERGO	3923 88TH ST NE	WA ALLSITES	Lower	985, 0.187, North
27	MUKILTEO WATER DIST	4300 84TH ST	WA ALLSITES, FINDS	Higher	1085, 0.205, ESE
E28	PRECISION TUNE MARYS	9113 STATE ST	RCRA-CESQG, WA ALLSITES, WA MANIFEST	Higher	1202, 0.228, NNE
E29	EDS TRANSMISSION OF	9113 STATE ST C	WA ALLSITES, RCRA NonGen / NLR, FINDS, ECHO	Higher	1202, 0.228, NNE
F30	CIRCLE K NO. 8878	8007 STATE AVE	WA UST	Higher	1236, 0.234, SSE
F31	CIRCLE K STORES INC	8007 STATE AVE	WA VCP, WA ALLSITES, WA CSCSL NFA, RCRA NonGen /...	Higher	1236, 0.234, SSE
32	LEDFORD MARINE CONST	4116 35TH DR NE	WA ALLSITES	Higher	1337, 0.253, WNW
E33	MIDAS AUTO SYSTEMS E	9113 B STATE ST	WA ALLSITES, RCRA NonGen / NLR	Higher	1389, 0.263, NNE
34	CAMANO CRUISERS INC	4116 OLD HWY 99	WA UST, WA ALLSITES, FINDS	Higher	1585, 0.300, NNE
35	AAA SUPERCLEAN	4115 78 PL NE	WA ALLSITES, WA MANIFEST	Lower	1685, 0.319, SSE
36	SNOHOMISH CNTY PUD 1	3120 QUIL CEDA WAY	WA ALLSITES, FINDS	Higher	1731, 0.328, WNW
37	JANSHA TANNING CO	1355 N STATE	WA ALLSITES, RCRA NonGen / NLR	Lower	1850, 0.350, South
G38	MARYSVILLE SCHOOL DI	4220 80TH ST NE	RCRA-CESQG, WA CSCSL, WA LUST, WA ALLSITES, WA...	Lower	1916, 0.363, SSE
G39	TRANSPORTATION YARD	4220 80TH ST. NE	WA ICR	Lower	1916, 0.363, SSE

MAPPED SITES SUMMARY

Target Property Address:
3824 88TH ST NE
MARYSVILLE, WA 98270

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
40	SEATTLE GOODWILL	9315 STATE AVENUE	WA SWRCY	Higher	1931, 0.366, NNE
41	WAL MART 2595	8924 QUILCEDA BLVD	RCRA-SQG, WA ALLSITES, FINDS, ECHO, WA MANIFEST	Higher	1939, 0.367, WNW
42	SAVERS RECYCLING, IN	1334 STATE AVE.	WA SWRCY	Lower	2189, 0.415, South
H43	KETA CONSTRUCTION CO	4426 80TH NE	WA UST, WA ICR, WA ALLSITES, WA CSCSL NFA	Lower	2326, 0.441, SE
H44	SNOHOMISH CNTY PUD 1	4518 80TH ST NE	WA ALLSITES, FINDS	Higher	2352, 0.445, SE
I45	BOBS APPLIANCE	1315 STATE AVE	WA SWF/LF, WA UST, WA ALLSITES	Lower	2376, 0.450, South
I46	JUDD & BLACK APPLIAN	1315 STATE STREET	WA SWRCY	Lower	2376, 0.450, South
47	NORTHWESTERN AUTOBOD	9508 STATE AVE	WA ALLSITES, RCRA NonGen / NLR	Higher	2421, 0.459, NNE
48	HOME DEPOT 4726	9310 QUIL CEDA BLVD	WA ALLSITES, WA MANIFEST	Higher	2613, 0.495, NNW
49	APEX RADIATOR WORKS	1293 STATE AVE	WA ALLSITES, RCRA NonGen / NLR	Lower	2635, 0.499, South
J50	SAFEWAY PLAZA	1218 STATE ST	WA CSCSL, WA LUST, WA VCP, WA ALLSITES, FINDS	Lower	3538, 0.670, South
J51	UNOCAL 4196	1202 STATE AVE	WA HSL, WA CSCSL, WA LUST, WA ALLSITES	Lower	3741, 0.709, South
52	ERGAS PROP B&M SHOPP	STATE AVE & GROVE ST	WA CSCSL, WA ALLSITES, WA DRYCLEANERS	Lower	3822, 0.724, South
53	PDQ LAUNDRY ROOM	1048 STATE AVE	WA HSL, WA CSCSL, WA ALLSITES	Lower	4853, 0.919, South

EXECUTIVE SUMMARY

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following records. For more information on this property see page 8 of the attached EDR Radius Map report:

Site	Database(s)	EPA ID
METAL FINISHING INC 4000 88TH ST NE MARYSVILLE, WA 98270	RCRA-LQG EPA ID:: WAD156908741 WA ALLSITES Facility Id: 90173599 WA SPILLS Facility ID: 425884 FINDS Registry ID:: 110000843348 ECHO Registry ID: 110000843348 CA HAZNET GEPAID: WAD156908741 WA MANIFEST Facility Site ID Number: 90173599 Gen Status CD: LQG Gen Status CD: MQG EPA ID: WAD156908741 WA NPDES Permit ID: ST0007381	WAD156908741
QUIL CEDA TANNING 3922 88TH ST NE MARYSVILLE, WA 98270	WA CSCSL Site Status: Awaiting Cleanup Facility ID: 53197229 Clean Up Siteid: 12007 WA ALLSITES Facility Id: 53197229 WA SPILLS Facility ID: 624863 WA MANIFEST Facility Site ID Number: 53197229 Gen Status CD: SQG EPA ID: WAD980981997	N/A
QUIL CEDA TANNING CO 3812 88TH ST NE MARYSVILLE, WA 98270	FTTS Database: FTTS INSP, Date of Government Version: 04/09/2009 HIST FTTS Database: HIST FTTS INSP, Date of Government Version: 10/19/2006	N/A
QUIL CEDA TANNING 3922 88TH ST NE MARYSVILLE, WA 98270	RCRA-LQG EPA ID:: WAD980981997 FINDS	WAD980981997

EXECUTIVE SUMMARY

Registry ID:: 110005337607

ECHO

Registry ID: 110005337607

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

STANDARD ENVIRONMENTAL RECORDS

Federal NPL site list

NPL..... National Priority List
Proposed NPL..... Proposed National Priority List Sites
NPL LIENS..... Federal Superfund Liens

Federal Delisted NPL site list

Delisted NPL..... National Priority List Deletions

Federal CERCLIS list

FEDERAL FACILITY..... Federal Facility Site Information listing
SEMS..... Superfund Enterprise Management System

Federal CERCLIS NFRAP site list

SEMS-ARCHIVE..... Superfund Enterprise Management System Archive

Federal RCRA CORRACTS facilities list

CORRACTS..... Corrective Action Report

Federal RCRA non-CORRACTS TSD facilities list

RCRA-TSDF..... RCRA - Treatment, Storage and Disposal

Federal institutional controls / engineering controls registries

LUCIS..... Land Use Control Information System
US ENG CONTROLS..... Engineering Controls Sites List
US INST CONTROL..... Sites with Institutional Controls

Federal ERNS list

ERNS..... Emergency Response Notification System

State and tribal leaking storage tank lists

INDIAN LUST..... Leaking Underground Storage Tanks on Indian Land

EXECUTIVE SUMMARY

State and tribal registered storage tank lists

FEMA UST..... Underground Storage Tank Listing
WA AST..... Aboveground Storage Tank Locations
INDIAN UST..... Underground Storage Tanks on Indian Land

State and tribal institutional control / engineering control registries

WA INST CONTROL..... Institutional Control Site List

State and tribal voluntary cleanup sites

INDIAN VCP..... Voluntary Cleanup Priority Listing

State and tribal Brownfields sites

WA BROWNFIELDS..... Brownfields Sites Listing

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS..... A Listing of Brownfields Sites

Local Lists of Landfill / Solid Waste Disposal Sites

WA SWTIRE..... Solid Waste Tire Facilities
INDIAN ODI..... Report on the Status of Open Dumps on Indian Lands
ODI..... Open Dump Inventory
DEBRIS REGION 9..... Torres Martinez Reservation Illegal Dump Site Locations
IHS OPEN DUMPS..... Open Dumps on Indian Land

Local Lists of Hazardous waste / Contaminated Sites

US HIST CDL..... Delisted National Clandestine Laboratory Register
WA CDL..... Clandestine Drug Lab Contaminated Site List
WA HIST CDL..... List of Sites Contaminated by Clandestine Drug Labs
US CDL..... National Clandestine Laboratory Register

Local Land Records

LIENS 2..... CERCLA Lien Information

Records of Emergency Release Reports

HMIRS..... Hazardous Materials Information Reporting System
WA SPILLS 90..... SPILLS 90 data from FirstSearch

Other Ascertainable Records

FUDS..... Formerly Used Defense Sites
DOD..... Department of Defense Sites
SCRD DRYCLEANERS..... State Coalition for Remediation of Drycleaners Listing

EXECUTIVE SUMMARY

US FIN ASSUR.....	Financial Assurance Information
EPA WATCH LIST.....	EPA WATCH LIST
2020 COR ACTION.....	2020 Corrective Action Program List
TSCA.....	Toxic Substances Control Act
TRIS.....	Toxic Chemical Release Inventory System
SSTS.....	Section 7 Tracking Systems
ROD.....	Records Of Decision
RMP.....	Risk Management Plans
RAATS.....	RCRA Administrative Action Tracking System
PRP.....	Potentially Responsible Parties
PADS.....	PCB Activity Database System
ICIS.....	Integrated Compliance Information System
MLTS.....	Material Licensing Tracking System
COAL ASH DOE.....	Steam-Electric Plant Operation Data
COAL ASH EPA.....	Coal Combustion Residues Surface Impoundments List
PCB TRANSFORMER.....	PCB Transformer Registration Database
RADINFO.....	Radiation Information Database
DOT OPS.....	Incident and Accident Data
CONSENT.....	Superfund (CERCLA) Consent Decrees
INDIAN RESERV.....	Indian Reservations
FUSRAP.....	Formerly Utilized Sites Remedial Action Program
UMTRA.....	Uranium Mill Tailings Sites
LEAD SMELTERS.....	Lead Smelter Sites
US AIRS.....	Aerometric Information Retrieval System Facility Subsystem
US MINES.....	Mines Master Index File
ABANDONED MINES.....	Abandoned Mines
UXO.....	Unexploded Ordnance Sites
DOCKET HWC.....	Hazardous Waste Compliance Docket Listing
FUELS PROGRAM.....	EPA Fuels Program Registered Listing
WA AIRS.....	Washington Emissions Data System
WA ASBESTOS.....	ASBESTOS
WA COAL ASH.....	Coal Ash Disposal Site Listing
WA Inactive Drycleaners.....	Inactive Drycleaners
WA UIC.....	Underground Injection Wells Listing

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP.....	EDR Proprietary Manufactured Gas Plants
EDR Hist Cleaner.....	EDR Exclusive Historical Cleaners

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

WA RGA HWS.....	Recovered Government Archive State Hazardous Waste Facilities List
WA RGA LF.....	Recovered Government Archive Solid Waste Facilities List
WA RGA LUST.....	Recovered Government Archive Leaking Underground Storage Tank

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified in the following databases.

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. 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. 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.

STANDARD ENVIRONMENTAL RECORDS

Federal RCRA generators list

RCRA-CESQG: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

A review of the RCRA-CESQG list, as provided by EDR, and dated 03/01/2018 has revealed that there are 3 RCRA-CESQG sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
HAGGEN OPCO NORTH LL	3711 88TH ST NE	NNW 1/8 - 1/4 (0.136 mi.)	D19	197
<i>CHARLIES STATE AVENU</i>	<i>9015 STATE AVE</i>	<i>NNE 1/8 - 1/4 (0.172 mi.)</i>	<i>24</i>	<i>211</i>
<i>PRECISION TUNE MARYS</i>	<i>9113 STATE ST</i>	<i>NNE 1/8 - 1/4 (0.228 mi.)</i>	<i>E28</i>	<i>232</i>

State- and tribal - equivalent NPL

WA HSL: The Hazardous Sites List is a subset of the CSCSL Report. It includes sites which have been assessed and ranked using the Washington Ranking Method (WARM).

A review of the WA HSL list, as provided by EDR, and dated 02/21/2018 has revealed that there are 2 WA HSL sites within approximately 1 mile of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>UNOCAL 4196</i> Facility Type: Hazardous Sites List FSID Number: 14133385 Facility Status: Cleanup Started	<i>1202 STATE AVE</i>	<i>S 1/2 - 1 (0.709 mi.)</i>	<i>J51</i>	<i>560</i>
<i>PDQ LAUNDRY ROOM</i> Facility Type: Hazardous Sites List FSID Number: 11747135 Facility Status: Awaiting Cleanup	<i>1048 STATE AVE</i>	<i>S 1/2 - 1 (0.919 mi.)</i>	<i>53</i>	<i>567</i>

EXECUTIVE SUMMARY

State- and tribal - equivalent CERCLIS

WA 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.

A review of the WA CSCSL list, as provided by EDR, and dated 04/16/2018 has revealed that there are 6 WA CSCSL sites within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
JIFFY LUBE MARYSVILL Site Status: Cleanup Started Facility ID: 55657475 Clean Up Siteid: 4581	8417 STATE AVE	SE 0 - 1/8 (0.043 mi.)	12	186
Lower Elevation	Address	Direction / Distance	Map ID	Page
MARYSVILLE SCHOOL DI Site Status: Cleanup Started Facility ID: 77948572 Clean Up Siteid: 6669	4220 80TH ST NE	SSE 1/4 - 1/2 (0.363 mi.)	G38	293
SAFEWAY PLAZA Site Status: Cleanup Started Facility ID: 74288773 Clean Up Siteid: 6602	1218 STATE ST	S 1/2 - 1 (0.670 mi.)	J50	557
UNOCAL 4196 Site Status: Cleanup Started Facility ID: 14133385 Clean Up Siteid: 5562	1202 STATE AVE	S 1/2 - 1 (0.709 mi.)	J51	560
ERGAS PROP B&M SHOPP Site Status: Awaiting Cleanup Facility ID: 2853 Clean Up Siteid: 3835	STATE AVE & GROVE ST	S 1/2 - 1 (0.724 mi.)	52	562
PDQ LAUNDRY ROOM Site Status: Awaiting Cleanup Facility ID: 11747135 Clean Up Siteid: 2817	1048 STATE AVE	S 1/2 - 1 (0.919 mi.)	53	567

State and tribal landfill and/or solid waste disposal site lists

WA SWF/LF: The Solid Waste Facilities/Landfill Sites records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. The data come from the Department of Ecology's Solid Waste Facilities Handbook.

A review of the WA SWF/LF list, as provided by EDR, has revealed that there is 1 WA SWF/LF site within approximately 0.5 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
BOBS APPLIANCE Database: SWF/LF, Date of Government Version: 06/04/2018	1315 STATE AVE	S 1/4 - 1/2 (0.450 mi.)	I45	450

EXECUTIVE SUMMARY

Facility ID: 1781

State and tribal leaking storage tank lists

WA 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.

A review of the WA LUST list, as provided by EDR, has revealed that there is 1 WA LUST site within approximately 0.5 miles of the target property.

Lower Elevation	Address	Direction / Distance	Map ID	Page
MARYSVILLE SCHOOL DI Database: LUST, Date of Government Version: 05/15/2018 Facility Status: Cleanup Started Cleanup Site ID: 6669 Facility ID: 77948572	4220 80TH ST NE	SSE 1/4 - 1/2 (0.363 mi.)	G38	293

State and tribal registered storage tank lists

WA 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.

A review of the WA UST list, as provided by EDR, and dated 05/01/2018 has revealed that there are 7 WA UST sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Direction / Distance	Map ID	Page
JIFFY LUBE MARYSVILL Site Id: 101012 Facility ID: 55657475	8417 STATE AVE	SE 0 - 1/8 (0.043 mi.)	12	186
QUIL CEDA TANNING CO Site Id: 4653 Facility ID: 82781664	T30N R5 S21	NE 0 - 1/8 (0.058 mi.)	13	189
BIGFOOT PROPERTIES X Site Id: 507990 Facility ID: 23557366	3608 88TH ST NE	NW 0 - 1/8 (0.100 mi.)	C16	194
7-ELEVEN STORE 2306- Site Id: 506611 Facility ID: 32838997	3609 88TH ST NE	NW 0 - 1/8 (0.108 mi.)	C17	195
88TH ST SHELL FOOD-M Site Id: 536073 Facility ID: 65243993	3506 88TH ST NE	WNW 1/8 - 1/4 (0.139 mi.)	C22	204
GRANGE SUPPLY INC CO Site Id: 9058 Facility ID: 43488153	8225 40TH AVE N E	SSE 1/8 - 1/4 (0.165 mi.)	23	205
CIRCLE K NO. 8878	8007 STATE AVE	SSE 1/8 - 1/4 (0.234 mi.)	F30	257

EXECUTIVE SUMMARY

Site Id: 97639
Facility ID: 98257124

State and tribal voluntary cleanup sites

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

A review of the WA VCP list, as provided by EDR, and dated 04/16/2018 has revealed that there is 1 WA VCP site within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
CIRCLE K STORES INC Facility ID: 98257124 Cleanup Siteid: 6978	8007 STATE AVE	SSE 1/8 - 1/4 (0.234 mi.)	F31	258

WA ICR: These are remedial action reports Ecology has received from either the owner or operator of the site. These actions have been conducted without department oversight or approval and are not under an order or decree.

A review of the WA ICR list, as provided by EDR, and dated 12/01/2002 has revealed that there are 2 WA ICR sites within approximately 0.5 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
TRANSPORTATION YARD	4220 80TH ST. NE	SSE 1/4 - 1/2 (0.363 mi.)	G39	320
KETA CONSTRUCTION CO	4426 80TH NE	SE 1/4 - 1/2 (0.441 mi.)	H43	446

ADDITIONAL ENVIRONMENTAL RECORDS

Local Lists of Landfill / Solid Waste Disposal Sites

WA SWRCY: A listing of recycling center locations.

A review of the WA SWRCY list, as provided by EDR, and dated 04/23/2018 has revealed that there are 3 WA SWRCY sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
SEATTLE GOODWILL	9315 STATE AVENUE	NNE 1/4 - 1/2 (0.366 mi.)	40	321
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
SAVERS RECYCLING, IN	1334 STATE AVE.	S 1/4 - 1/2 (0.415 mi.)	42	445
JUDD & BLACK APPLIAN	1315 STATE STREET	S 1/4 - 1/2 (0.450 mi.)	I46	452

EXECUTIVE SUMMARY

Local Lists of Hazardous waste / Contaminated Sites

Information on facilities and sites of interest to the Department of Ecology.

A review of the WA ALLSITES list, as provided by EDR, and dated 05/09/2018 has revealed that there are 31 WA ALLSITES sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
ATT MOBILITY MARYSVI Facility Id: 23925	3926 88TH ST NE	0 - 1/8 (0.001 mi.)	B7	172
MILLING SPECIALTIES Facility Id: 99579783	8430 STATE ST	SSE 0 - 1/8 (0.007 mi.)	8	172
CLEARCREEK CONTRACTO Facility Id: 13835 Facility Id: 5131338	3919 88TH ST NE	NNE 0 - 1/8 (0.023 mi.)	B9	174
JIFFY LUBE MARYSVILL Facility Id: 55657475	8417 STATE AVE	SE 0 - 1/8 (0.043 mi.)	12	186
QUIL CEDA TANNING CO Facility Id: 82781664	T30N R5 S21	NE 0 - 1/8 (0.058 mi.)	13	189
BIGFOOT PROPERTIES X Facility Id: 23557366	3608 88TH ST NE	NW 0 - 1/8 (0.100 mi.)	C15	192
7 ELEVEN STORE 23063 Facility Id: 32838997	3609 88TH ST NE	NW 0 - 1/8 (0.108 mi.)	C18	196
HAGGEN OPCO NORTH LL Facility Id: 16650	3711 88TH ST NE	NNW 1/8 - 1/4 (0.136 mi.)	D20	200
88TH ST TEXACO FOODM Facility Id: 65243993	3506 88TH ST NE	WNW 1/8 - 1/4 (0.139 mi.)	C21	203
GRANGE SUPPLY INC CO Facility Id: 43488153	8225 40TH AVE N E	SSE 1/8 - 1/4 (0.165 mi.)	23	205
CHARLIES STATE AVENU Facility Id: 95598925	9015 STATE AVE	NNE 1/8 - 1/4 (0.172 mi.)	24	211
TDC 88TH STREET RETA Facility Id: 23648		NW 1/8 - 1/4 (0.183 mi.)	25	231
MUKILTEO WATER DIST Facility Id: 81111419	4300 84TH ST	ESE 1/8 - 1/4 (0.205 mi.)	27	231
PRECISION TUNE MARYS Facility Id: 53696728	9113 STATE ST	NNE 1/8 - 1/4 (0.228 mi.)	E28	232
EDS TRANSMISSION OF Facility Id: 3495787	9113 STATE ST C	NNE 1/8 - 1/4 (0.228 mi.)	E29	254
CIRCLE K STORES INC Facility Id: 98257124	8007 STATE AVE	SSE 1/8 - 1/4 (0.234 mi.)	F31	258
LEDFORD MARINE CONST Facility Id: 23198361	4116 35TH DR NE	WNW 1/4 - 1/2 (0.253 mi.)	32	282
MIDAS AUTO SYSTEMS E Facility Id: 69232276	9113 B STATE ST	NNE 1/4 - 1/2 (0.263 mi.)	E33	283
CAMANO CRUISERS INC Facility Id: 41559612	4116 OLD HWY 99	NNE 1/4 - 1/2 (0.300 mi.)	34	284
SNOHOMISH CNTY PUD 1	3120 QUIL CEDA WAY	WNW 1/4 - 1/2 (0.328 mi.)	36	291

EXECUTIVE SUMMARY

Facility Id: 4546617				
WAL MART 2595	8924 QUILCEDA BLVD	WNW 1/4 - 1/2 (0.367 mi.)	41	323
Facility Id: 1883741				
SNOHOMISH CNTY PUD 1	4518 80TH ST NE	SE 1/4 - 1/2 (0.445 mi.)	H44	449
Facility Id: 9214397				
NORTHWESTERN AUTOBOD	9508 STATE AVE	NNE 1/4 - 1/2 (0.459 mi.)	47	453
Facility Id: 58315986				
HOME DEPOT 4726	9310 QUIL CEDA BLVD	NNW 1/4 - 1/2 (0.495 mi.)	48	456
Facility Id: 7590323				
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
B2B ENERGO	3923 88TH ST NE	N 1/8 - 1/4 (0.187 mi.)	26	231
Facility Id: 19331				
AAA SUPERCLEAN	4115 78 PL NE	SSE 1/4 - 1/2 (0.319 mi.)	35	286
Facility Id: 8890				
JANSHA TANNING CO	1355 N STATE	S 1/4 - 1/2 (0.350 mi.)	37	292
Facility Id: 75711168				
MARYSVILLE SCHOOL DI	4220 80TH ST NE	SSE 1/4 - 1/2 (0.363 mi.)	G38	293
Facility Id: 77948572				
KETA CONSTRUCTION CO	4426 80TH NE	SE 1/4 - 1/2 (0.441 mi.)	H43	446
Facility Id: 12761721				
BOBS APPLIANCE	1315 STATE AVE	S 1/4 - 1/2 (0.450 mi.)	I45	450
Facility Id: 33629762				
APEX RADIATOR WORKS	1293 STATE AVE	S 1/4 - 1/2 (0.499 mi.)	49	556
Facility Id: 18937824				

WA CSCSL NFA: The data set contains information about sites previously on the Confirmed and Suspected Contaminated Sites list that have received a No Further Action (NFA) determination. Because it is necessary to maintain historical records of sites that have been investigated and cleaned up, sites are not deleted from the database when cleanup activities are completed. Instead a No Further Action code is entered based upon the type of NFA determination the site received.

A review of the WA CSCSL NFA list, as provided by EDR, and dated 04/16/2018 has revealed that there are 3 WA CSCSL NFA sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
GRANGE SUPPLY INC CO	8225 40TH AVE N E	SSE 1/8 - 1/4 (0.165 mi.)	23	205
Facility/Site Id: 43488153 CS Id: 9181				
CIRCLE K STORES INC	8007 STATE AVE	SSE 1/8 - 1/4 (0.234 mi.)	F31	258
Facility/Site Id: 98257124 CS Id: 6978				
<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
KETA CONSTRUCTION CO	4426 80TH NE	SE 1/4 - 1/2 (0.441 mi.)	H43	446
Facility/Site Id: 12761721				

EXECUTIVE SUMMARY

CS Id: 7958

Other Ascertainable Records

RCRA NonGen / NLR: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

A review of the RCRA NonGen / NLR list, as provided by EDR, and dated 03/01/2018 has revealed that there are 5 RCRA NonGen / NLR sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
MILLING SPECIALTIES	8430 STATE ST	SSE 0 - 1/8 (0.007 mi.)	8	172
CLEARCREEK CONTRACTO	3919 88TH ST NE	NNE 0 - 1/8 (0.023 mi.)	B10	184
JIFFY LUBE MARYSVILL	8417 STATE AVE	SE 0 - 1/8 (0.043 mi.)	12	186
EDS TRANSMISSION OF	9113 STATE ST C	NNE 1/8 - 1/4 (0.228 mi.)	E29	254
CIRCLE K STORES INC	8007 STATE AVE	SSE 1/8 - 1/4 (0.234 mi.)	F31	258

FINDS: The Facility Index System contains both facility information and "pointers" to other sources of information that contain more detail. These include: RCRIS; Permit Compliance System (PCS); Aerometric Information Retrieval System (AIRS); FATES (FIFRA [Federal Insecticide Fungicide Rodenticide Act] and TSCA Enforcement System, FTTS [FIFRA/TSCA Tracking System]; CERCLIS; DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes); Federal Underground Injection Control (FURS); Federal Reporting Data System (FRDS); Surface Impoundments (SIA); TSCA Chemicals in Commerce Information System (CICS); PADS; RCRA-J (medical waste transporters/disposers); TRIS; and TSCA. The source of this database is the U.S. EPA/NTIS.

A review of the FINDS list, as provided by EDR, and dated 02/21/2018 has revealed that there are 2 FINDS sites within approximately 0.001 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
QUIL CEDA TANNING CO	T30N R5 S21	0 - 1/8 (0.000 mi.)	A5	171
ATT MOBILITY MARYSVI	3926 88TH ST NE	0 - 1/8 (0.001 mi.)	B6	172

WA MANIFEST: Hazardous waste manifest information.

A review of the WA MANIFEST list, as provided by EDR, and dated 12/31/2017 has revealed that there are 5 WA MANIFEST sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
CLEARCREEK CONTRACTO	3919 88TH ST NE	NNE 0 - 1/8 (0.023 mi.)	B9	174
Facility Site ID Number: 13835 Gen Status CD: XQG EPA ID: WAH000043796				
HAGGEN OPCO NORTH LL	3711 88TH ST NE	NNW 1/8 - 1/4 (0.136 mi.)	D20	200
Facility Site ID Number: 16650				