

FORMER SEDRO-WOOLLEY LUMBER MILL
109 JAMESON STREET, SEDRO-WOOLLEY, WASHINGTON

PHASE I ENVIRONMENTAL SITE ASSESSMENT



Prepared for
CITY OF SEDRO-WOOLLEY, WASHINGTON
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ACRONYMS AND ABBREVIATIONS

AAI	all appropriate inquiries
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
bgs	below ground surface
BNSF	Burlington Northern Santa Fe Railway Company
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
City	City of Sedro-Woolley, Washington
Client	City of Sedro-Woolley, Washington
County	Skagit County, Washington
CREC	controlled recognized environmental condition
CSCSL	Confirmed and Suspected Contaminated Sites List
CSCSL-NFA	Confirmed and Suspected Contaminated Sites List No Further Action
Ecology	Washington State Department of Ecology
EDR	Environmental Data Resources, Inc.
ESA	environmental site assessment
FSID	facility/site identification
FTTS	Federal Insecticide, Fungicide, and Rodenticide Act/Toxics Substance Control Act Tracking System
GPR	ground-penetrating radar
HREC	historical recognized environmental condition
HSL	Washington State Hazardous Site List
ICR	independent cleanup report
LUST	leaking underground storage tank
MFA	Maul Foster & Alongi, Inc.
MTCA	Model Toxics Control Act
NFA	No Further Action
NWI	National Wetland Inventory
PCB	polychlorinated biphenyl
PCS	petroleum-contaminated soil
REC	recognized environmental condition
Site	Sedro-Woolley Lumber Company site
SFIM	Sanborn Fire Insurance Map
SPCC	spill prevention, control, and countermeasures plan
SVE	soil vapor extraction
SWPPP	stormwater pollution prevention plan
the Property	109 Jameson Street, Sedro-Woolley, Washington
U.S.	United States
USEPA	U.S. Environmental Protection Agency
user	City of Sedro-Woolley, Washington

ACRONYMS AND ABBREVIATIONS (CONTINUED)

USGS	U.S. Geological Survey
UST	underground storage tank
VCP	Ecology Voluntary Cleanup Program
Whitman	Whitman Environmental Sciences

EXECUTIVE SUMMARY

This summary contains the findings and opinions of the environmental site assessment (ESA) and is intended for use with the supporting text, figures, and attachments of the complete report.

At the request of City of Sedro-Woolley, Washington (City), Maul Foster & Alongi, Inc. (MFA) conducted the Phase I ESA of the site at 109 Jameson Street, Sedro-Woolley, Washington (the Property).

The Phase I ESA was conducted in accordance with the requirements of the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-13). In addition, the Phase I ESA report was prepared to support the Bona Fide Prospective Purchaser defense (Comprehensive Environmental Response, Compensation and Liability Act [CERCLA] § 101(4)) and the innocent purchaser defense (CERCLA § 101(35)(A)(i)). The Phase I ESA generally complies with 40 Code of Federal Regulations Part 312, adopted by the U.S. Environmental Protection Agency on November 5, 2005, and effective November 1, 2006. These rules identify the standards and practices for all appropriate inquiries under CERCLA § 101(35)(B). The purpose of the Phase I ESA was to identify, to the extent reasonably feasible, “recognized environmental conditions” (RECs).

PROPERTY SUMMARY

The approximately 42-acre Property is a currently vacant and unused, with the exception of cattle pasturing on the south end. The Sedro-Woolley Lumber Company formerly operated a lumber mill on the north end of the Property and on adjoining properties.

RECOGNIZED ENVIRONMENTAL CONDITIONS

ASTM E1527-13 defines RECs 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.

Based on MFA’s review of historical records for the Property, in particular prior environmental reports, the following RECs were identified for the Property:

REC	Description
Potential petroleum impacts in groundwater from underground storage tanks (USTs) on the neighboring Sedro-Woolley City Sanitation property	Washington State Department of Ecology UST records indicate that three USTs, installed on December 31, 1964, are located on the neighboring Sedro-Woolley City Sanitation property and that closure is in process for all three. Given the age of the USTs and the fact that no closure records were obtained, there is the possibility that a release from the USTs occurred at some point. A release likely would impact shallow groundwater. The USTs likely are located crossgradient of the Property, given that a south-southeast groundwater flow direction was identified; however, given the proximity of the USTs to the Property, there is the potential for groundwater impacted by a release from the USTs to migrate onto the Property.
Potential hazardous-waste-containing wood debris in the former log yard	It is possible that hazardous substances are mixed in with the untreated woodwaste in the former log yard. Soil investigations conducted in the former log yard area identified the presence of petroleum hydrocarbons above Model Toxics Control Act (MTCA) Method A cleanup levels, but below site-specific MTCA Method B cleanup levels. Site-specific cleanup level calculations were not provided for review to verify findings, and it was not clear if the soil impacts were close enough to the water table to require collection of groundwater samples. Therefore, there are still potential soil and/or groundwater impacts on the Property associated with hazardous waste material mixed in with wood debris in the former log yard area.
Potential polychlorinated biphenyl (PCB) release(s) to shallow soil in former mill operational areas	A Federal Insecticide, Fungicide, and Rodenticide Act/Toxics Substance Control Act tracking system listing identified a violation at the Property associated with "PCB, Use PCB, Label or Marking PCB, Failure to Maintain Records," as identified during Environmental Data Resources, Inc.'s record search. Based on that finding, and the fact that PCBs were not evaluated during previous investigations at the Property, there is the potential for a PCB release(s) to shallow soil in the former active mill operation areas.
Groundwater impacts associated with leaking underground storage tanks (LUSTs) in the former fabrication shop area	No documentation was provided to confirm that groundwater impacts remaining in the former fabrication shop LUST area had been cleaned up to the requirements of MTCA, or that a No Further Action (NFA) determination had been issued. The most recent sampling results obtained, from 2006, identified MTCA cleanup level exceedances. A risk assessment conducted in 2006 identified vapor intrusion as a concern within an approximately 100-foot radius of the plume, and identified drinking water exposure as a human health risk. It is not clear if contaminated groundwater or soil vapor associated with the release has migrated onto the Property.

REC	Description
Buried and capped former treatment cell soil	Soil removed from the former fabrication shop LUST area on the neighboring property excavation was treated on that property. This soil was later buried in an area to the southwest of the former sawmill, which may be located on the Property. Chemical constituents associated with petroleum releases were not analyzed and may remain in subsurface soil and, if present, may have leached to groundwater.
Petroleum-contaminated soil (PCS) associated with former maintenance shop	A determination that no cleanup action was needed to address PCS in the former maintenance shop area was based on samples collected from one soil boring. Although an NFA determination was issued for diesel and oil in soil near the maintenance shop, the potential exists for PCS remaining in the uninvestigated surrounding area. If PCS is present, there is the potential for associated impacts to the underlying groundwater.
PCS associated with former debarker loader stockpile	The former debarker loader stockpile was removed and disposed of off site and an NFA determination was issued. However, although it was noted in the 1998 Phase II ESA report that the stockpile was stored on top of asphalt, it was not clear how the stockpiled soil was managed while on site for over a year. Soil samples were not collected in the vicinity to verify that there had been no runoff of contaminants to the surrounding area. Therefore, the potential exists for PCS remaining in shallow soil in any unpaved areas surrounding the former stockpile.
PCS associated with former shake mill	Sidewall confirmation samples were not collected during the PCS removal cleanup action conducted in the former shake mill area. While an NFA determination was issued for diesel and oil in soil in the former shake mill area, the information provided does not confirm that the lateral extent of PCS was removed. Therefore, there is the potential for shallow PCS remaining in the area surrounding the former shake mill excavation area.
Petroleum-impacted groundwater from former fueling station, helipad, and heavy equipment boneyard areas on the neighboring property	An NFA determination was issued for PCS in the former fueling station, helipad, and equipment boneyard areas on the neighboring property to the west; however, groundwater was not assessed as part of the investigation and cleanup actions in these areas and cleanup determinations were made based on limited data (e.g., one boring the in helipad area). Soil excavation in the former fueling station area extended to a depth of 15 feet below ground surface, which is within the range of water table elevations identified for the Property. Therefore, the potential exists for petroleum impacts in groundwater associated with these areas to migrate beneath the Property.
Lead and asbestos in building demolition debris and underlying soil	During the 1998 Phase II ESA, lead-based paint was identified in small areas of the maintenance shop, and asbestos was identified in several buildings. Demolition debris from a former building(s) is present on the Property. There is the potential that lead and asbestos are present in the debris piles and, since the piles appear to be located on bare ground, that they were transported to and accumulated in the underlying soil.

In addition, based on MFA's review of historical records provided by the City for the Property and adjoining properties, the following RECs were identified for the Property:

USTs and a former gasoline station at 1400 and 1404 Third Streets. There is the potential for petroleum-related contamination to have migrated into soil and/or groundwater on the Property as a result of potential releases(s) associated with a former gasoline station and/or USTs located on these neighboring properties. The USTs may have been associated with the former gasoline station; however, sufficient documentation was not provided to confirm the location of either the USTs or the former gasoline station or to confirm the proper closure of the USTs.

Former bulk fuel plant and automobile repair operations on the 1617 Third Street property. There is the potential for petroleum-related contamination in groundwater on the property associated with historical operations that, if present, could migrate onto the Property.

Potential petroleum- and metals-related contamination in soil in the northwest corner of the Property. Petroleum-related chemicals and heavy metals were detected in soil from test pits excavated in the northwest corner of the Property, but adequate information was not provided to review the results.

HISTORICAL RECOGNIZED ENVIRONMENTAL CONDITIONS

ASTM E1527-13 defines historical RECs (HRECs) as a past release of any hazardous substances or petroleum products that has occurred in connection with a property and that has been addressed to the satisfaction of the applicable regulatory authority, or meets unrestricted-use criteria established by a regulatory authority, without the property being subjected to any required controls.

Based on MFA's review of historical records for the Property, in particular prior environmental reports, the following HRECs were identified for the Property:

Diesel and oil in soil at the former shake mill. A cleanup was conducted to address PCS in the former shake mill area and an NFA determination was issued. Therefore, PCS within the boundaries of the excavation was addressed.

Buried waste drums in the vicinity of the hydrant. An allegation that hazardous waste drums were buried in an area near the hydrant on the Property was evaluated via ground-penetrating radar survey and subsurface soil investigation. No impacts were identified in the approximately 0.8-acre area surrounding the hydrant. Therefore, the potential presence of waste drums in that area was addressed.

CONTROLLED RECOGNIZED ENVIRONMENTAL CONDITIONS

ASTM E1527-13 defines controlled RECs (CRECs) as resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority.

No CRECs were identified on the Property.

ADDITIONAL FINDINGS

MFA conducted a wetland review that identified potential wetland areas on the Property.

DE MINIMIS CONDITIONS

A de minimis condition, as defined by ASTM E1527-13, generally does not present a threat to human health or the environment, and generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

MFA identified the following de minimis conditions on the Property:

Leachate from the former log pond and wood debris in the former log yard. Historical aerial photographs, user-provided information, and an interview of the Property owner indicated that a log pond was formerly located on the Property. Woodwaste was identified in the former log yard. Tannins, phenols, resins, and fatty acids may have leached out of timber stored in the log pond and/or log yard and accumulated in the underlying soil and/or groundwater. Groundwater and/or surface water runoff impacted by woodwaste may have elevated chemical and/or biological oxygen demands and total suspended solids. While these water quality conditions are not associated with hazardous substances regulated under MTCA, if discharged to a surface water body they may impact water quality conditions. Therefore, potential impacts to water quality resulting from remaining untreated wood debris, or residues of untreated wood, in the former log pond and log yard areas are considered a de minimis condition.

Wood debris in former log yard. The Phase II ESA estimated that 300,000 to 350,000 cubic yards of wood debris may be present on the former log yard located both on- and off-Property. While the wood debris itself is not considered a source of hazardous substances, it does present a potential geotechnical concern for future development and typically requires management as a solid waste (e.g., capping to prevent infiltration, groundwater monitoring).

Miscellaneous petroleum storage and use. According to the stormwater pollution prevention plan (SWPPP), petroleum products, including waste oil, gear oil, hydraulic oil, motor oil, diesel fuel, gasoline, and mineral spirits were used and stored above ground in multiple locations across the former lumber mill facility. Hydraulic units and equipment were also stored and used across the Property. Spills may have occurred during loading and/or unloading of liquid materials and/or operation and maintenance of equipment. The SWPPP indicated that a spill prevention, control, and countermeasures plan (SPCC) was required; no SPCC was provided for the Property.

Parts washing; vehicle and equipment maintenance, washing, and steam cleaning. The SWPPP indicated that these activities were being conducted at the Property. There is the potential for releases to have occurred if these operations were not managed in accordance with the SWPPP. However, the records review identified no spills or releases associated with these activities.

Unidentified buried waste and hazardous waste dumping. Multiple allegations were made that waste drums had been buried on the Property. Limited investigation was conducted to address this concern, but only 0.8 acre out of approximately 42 acres of Property was evaluated. Also, public access

to the Property is unrestricted and evidence of illegal dumping was encountered during the site reconnaissance visit. While the presence of these wastes has not been confirmed, the potential exists for unauthorized waste and/or buried waste to be encountered on the Property.

Chemical byproducts associated with burned material on the Property. Burned wood and other materials with associated carcinogenic and toxic chemicals may be present in small quantities on the Property as a result of previous fires. Given that it is unlikely that large quantities of burned materials are present on the Property, it is considered a de minimis condition.

DATA GAPS

Complete documentation was not provided for soil investigations conducted on the Property in 2005, by GeoEngineers, and in 2007 by Environmental Health Management. Therefore, MFA could not adequately review the sampling results.

No documentation or records were provided that indicated whether the USTs located at 1400 and/or 1404 Third Street were closed-in-place or removed; the number of USTs present; or the UST contents, years of usage, or capacities.

A GeoTest Services, Inc. report, dated July 9, 2007, indicates the presence of petroleum hydrocarbon and metals constituents in soil in the northwest corner of the Property. The report concludes that concentrations do not exceed regulatory cleanup criteria, but does not provide adequate documentation to review the results.

RECOMMENDATIONS

MFA recommends that, if the Client intends to develop the Property, they consider whether the wetland assessment previously conducted at the Property has sufficiently evaluated wetland conditions in the areas proposed for development.

MFA recommends additional soil and groundwater investigation on the Property to evaluate the identified RECs.

CONCLUSIONS

MFA has conducted a Phase I ESA, in conformance with the scope and limitations of ASTM Practice E1527-13, of 109 Jameson Street, Sedro-Woolley, Washington.

The Phase I ESA revealed evidence of RECs in connection with the Property:

- Potential petroleum impacts in groundwater from USTs on the neighboring Sedro-Woolley City Sanitation property
- Potential hazardous-waste-containing wood debris in the former log yard
- Potential PCB release(s) to shallow soil in former mill operational areas

- Groundwater impacts associated with LUSTs in the former fabrication shop area
- Buried and capped former treatment cell soil
- PCS associated with former maintenance shop
- PCS associated with former debarker loader stockpile
- PCS associated with former shake mill
- Petroleum-impacted groundwater from former fueling station, helipad, and heavy equipment boneyard areas on the neighboring property
- Lead and asbestos in building demolition debris and underlying soil
- Potential petroleum impacts in soil and/or groundwater from USTs and a former gasoline station at 1400 and 1404 Third Streets
- Potential petroleum impacts in groundwater from former bulk fuel plant and automobile repair operations on the 1617 Third Street property
- Potential petroleum- and metals-related contamination in soil in the northwest corner of the Property

1 INTRODUCTION

1.1 Purpose

On behalf of City of Sedro-Woolley, Washington, Maul Foster & Alongi, Inc. (MFA) conducted a Phase I environmental site assessment (ESA) of the property located at 109 Jameson Street, Sedro-Woolley, Washington (the Property) (see Figure 1). The Phase I ESA was conducted in accordance with the requirements of the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-13). In addition, the Phase I ESA report was prepared to support the Bona Fide Prospective Purchaser defense (Comprehensive Environmental Response, Compensation and Liability Act [CERCLA] § 101(4)) and the innocent purchaser defense (CERCLA § 101(35)(A)(i)). The Phase I ESA generally complies with 40 Code of Federal Regulations (CFR) Part 312, adopted by the U.S. Environmental Protection Agency (USEPA) on November 5, 2005, and effective November 1, 2006. These rules identify the standards and practices for all appropriate inquiries (AAI) under CERCLA § 101(35)(B). The purpose of the Phase I ESA was to identify, to the extent reasonably feasible, “recognized environmental conditions” (RECs). ASTM Practice E1527-13 defines RECs as:

...the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property.

RECs include the presence of hazardous substances or petroleum products even under conditions that comply with applicable environmental laws. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment, and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

1.2 Scope of Work

The scope of work included four components, each of which is briefly described below.

1.2.1 Site Reconnaissance Visit

On October 10, 2017, Heather Good of MFA conducted a site reconnaissance of the Property to look for evidence of RECs. The results of this site visit are documented in Section 2.

1.2.2 Records Review

MFA reviewed the following records:

- State and federal agency database records as described in Section 4.1.
- Aerial photographs of the site as described in Section 4.3.1.

- Sanborn Fire Insurance Maps (SFIMs) for the Property, if available. See Section 4.3.2.
- Historical city directories for the Property. See Section 4.3.3.
- Prior site assessment reports for the Property. See Section 4.4.

The U.S. Geological Survey (USGS) 7.5-minute quadrangle map (1990) for Sedro-Woolley South was used as the physical setting source (see Figure 1).

1.2.3 Interviews

To obtain site-specific information regarding the Property, MFA interviewed current and/or former managers, owners, occupants, and operators of the Property and adjoining properties as deemed prudent. MFA also interviewed state and/or local government officials for information about the Property. The interviews are discussed in detail in Section 5 of this report.

1.2.4 Report Preparations

MFA prepared this report in accordance with ASTM E1527-13. The recommended format was adjusted to improve usability and comprehension. Consistent with this ASTM guidance document, the following issues were not formally evaluated during the Phase I ESA: asbestos-containing building materials; radon; lead-based paint; lead in drinking water; wetlands; regulatory compliance; cultural and historic resources; industrial hygiene; health and safety; ecological resources; endangered species; indoor air quality (including vapor intrusion); biological agents; toxic fungus; mold; and high-voltage power lines.

1.3 Significant Assumptions

Significant assumptions include any assumptions made during the Phase I ESA process that have the potential to impact the opinions put forth in the report. No significant assumptions were made in the preparation of this report.

1.4 Limitations and Exceptions

Any opinions and/or recommendations presented in this Phase I ESA report apply to conditions that existed at the Property when the services were performed. No environmental assessment can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. Performance of a Phase I ESA is intended to reduce, but not eliminate, uncertainty regarding the existence of RECs in connection with a property.

MFA conducted AAI regarding the potential for RECs at the Property. ASTM E1527-13 defines AAI as

...inquiry constituting “all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice” as defined in CERCLA, 42 U.S.C §9601(35)(B), that will qualify a party to a commercial real estate transaction for one of threshold criteria for satisfying the LLPs to CERCLA liability (42 U.S.C §9601(35)(A) & (B), §9607(b)(3), §9607(q); and §9607(r)), assuming compliance with other elements of the defense.

MFA is not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services, and does not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

1.5 Special Terms and Conditions

No special terms or conditions apply to this Phase I ESA other than those set forth in ASTM Standard E1527-13, CERCLA 101(35)B(iii), and 40 CFR Part 312.

1.6 Deviations

There were no deviations from ASTM Standard Practice E1527-13, CERCLA 101(35)B(iii), and 40 CFR Part 312.

1.7 Additional Service

During the site reconnaissance visit, MFA observed a low-lying marshy area with thick, grassy vegetation on the Property (see Section 2). Based on this observation, MFA conducted a limited wetland review of the Property, as discussed in Section 6.

1.8 Qualifications of Responsible Environmental Professionals

The Phase I ESA of the Property was conducted by environmental professionals experienced in performing ESAs and familiar with ASTM Standard Practice E1527-13 and industrial facility operations. Résumés of the environmental professionals involved in the performance of the Phase I ESA are included in Appendix A.

1.9 Reliance

For the purposes of the contractual relationship, the term “Client” refers to the City of Sedro-Woolley, which has sole permission to rely on this report. ASTM Standard Practice E1527-13 defines the “user” as the party seeking to use the standard to complete an ESA. The Client is the user of this Phase I ESA.

2 SITE DESCRIPTION AND RECONNAISSANCE

2.1 Objective and Methodology

Ms. Good of MFA conducted a site reconnaissance visit on October 10, 2017, in order to obtain information indicating the presence of RECs in connection with the Property. During the site reconnaissance visit, Ms. Good visually and/or physically observed the Property for evidence of the presence of RECs, including evidence of underground storage tanks (USTs) and aboveground storage tanks (ASTs), petroleum products, transformers containing polychlorinated biphenyls (PCBs), and use

and storage of hazardous material. One structure was present on the Property. The interior and exterior of that structure was not observed because of the limiting conditions described in Section 2.1.3. The Property and adjacent properties were observed from public thoroughfares. Site photographs taken during the site reconnaissance are included in Appendix B.

2.1.1 Exterior

Ms. Good visually and physically observed the periphery of the Property. The periphery of the one structure present on the Property was not observed because of the limiting conditions described in Section 2.1.3. The uses of roads and paths, with no apparent outlet, on the Property were identified in an effort to determine whether these roads were likely to have been used as avenues for disposal of hazardous substances or petroleum products. The Property and adjacent properties were also observed from public thoroughfares.

2.1.2 Interior

Ms. Good did not observe the interior of the one structure present on the Property because of the limiting conditions described in Section 2.1.3.

2.1.3 Limiting Conditions

Ms. Good did not observe the periphery or interior of the one structure present on the Property: a barn located near the southern Property boundary. The barn is located on a fenced portion of the Property that is privately leased for pasturing livestock. Permission was not obtained from the lessee to enter that portion of the Property, “No Trespassing” signs were posted, and the land was reportedly in active use for pasturing cattle. Ms. Good observed the barn from outside a closed gate located at the end of Morris Street.

Ms. Good did not observe the periphery of all tax lots included in the Property. The periphery of tax lots located on the southern portion of the Property, adjoining privately owned neighboring properties and not visible from public thoroughfares, were not observed. A heavily vegetated portion of the western periphery of the northern portion of the Property that was not accessible from a public thoroughfare was not observed.

Ms. Good did not enter portions of the Property with heavy vegetation, including thick clusters of blackberry bushes, tall and thick grasses, and marshy ground.

Based on the use of these portions of the Property and the barn structure, these access limitations do not appear likely to impact the findings of this report.

2.2 General Site Setting

2.2.1 Property Location and Legal Description

The approximately 42.65-acre Property is located at 109 Jameson Street, Sedro-Woolley, Washington, in section 25, township 35 north, range 4 east, of the Willamette Meridian (see Figure 1), on tax lots

P75932, P75933, P75935, P75936, P75937, P37623, P37624, P37625, P37627, P37648, P37652, P37653, P37656, and P37657.

2.2.2 Site and Vicinity Characteristics

According to the City zoning map, with an effective date of June, 4, 2016, Property tax lots P75932, P75933, P75935, P75936, P75937, and P37648 are located in the City and are zoned industrial; and the remaining Property tax lots are located in the County. According to the County 2016 comprehensive plan map, as accessed from the County iMap (County, 2017), the following Property tax lots are located in the County and are zoned as follows: P37653, P37657, P37624, and P37625 are zoned urban reserve commercial – industrial; P7652, P37656, P37623, and P37627 are zoned agricultural – natural resource land.

The Property is currently vacant, except for the Property's southern portion, which is privately leased for use of the barn structure and for livestock pasturing. The pasture area is fenced, and chain-link fencing is present along a section of the eastern Property boundary adjoining a neighboring apartment building complex, but the Property is otherwise not fenced. In general, the Property is level. The southern portion of the Property has been cleared for agricultural use. The south-central portion of the Property and parts of the northern portion of the Property are heavily vegetated with trees and shrubs. The north-central portion of the Property is a low-lying marshy area covered with tall, thick grasses. The northern portion of the Property is largely paved with asphalt; large portions are heavily vegetated with blackberry bushes, trees, and/or shrubs; there are several concrete pads, concrete structures, and piles of demolition debris consisting of concrete blocks and rebar that appear to be remnants of former buildings; and other features that appear to be remnants of the former lumber mill are present, including two stickup pipes surrounded by traffic fencing, a utility vault, an in-ground concrete basin, and three strips of concrete paving measuring approximately 200 feet long by 40 feet wide. Site features are shown in Figure 3.

2.2.3 Current Uses of Property

The southern portion of the Property is currently used as livestock pasture and is fenced, with a gate located at the end of Morris Street. A wooden barn with an aluminum roof is located on tax lot P37656.

The central and northern portions of the Property are not currently used for any sanctioned activities; however, aside from chain-link fencing along sections of the northeast perimeter of the Property, adjoining the neighboring apartment complex, no fencing is present and the public can gain access. Based on the types and amounts of solid waste observed, and the presence of vehicle and foot tracks, it appears the northern portion of the Property is used for illegal dumping and possibly joyriding and partying.

It appears that no hazardous substances or petroleum products are stored on site.

2.2.4 Past Uses of Property

A history of the Property was determined from interviewing the Property owner (see Section 5.1) and from information obtained as part of the records review (see Section 4).

The Property was formerly owned by Sedro-Woolley Lumber Company, WTD Industries, Inc., and TreeSource Industries, Inc., all three of which operated a lumber mill (the former Sedro-Woolley Lumber Mill) on the northern portion. Skagit County, Washington (the County) tax assessor records indicate that Sedro-Woolley Lumber Company purchased the Property in 1986. The current owner, Barbara Ryers (owner of Trigger 1, LLC), inherited the Property from her deceased husband, Wilbur Wridge (owner of Fire Ridge LLC, a previous owner of the Property), who purchased the Property in 2008.

The exact dates of mill operations are unknown, but historical accounts of the area available online from the Skagit River Journal (www.skagitriverjournal.com) indicate that the Property may have first been developed as a lumber mill by Ike Deeter in the early 1900s and was later purchased by the Goodyear-Nelson Hardwood Lumber Company and expanded sometime between about 1925 and 1930. Aerial photographs from as early as 1941 that were reviewed as part of this Phase I ESA suggest that the mill had already been constructed by as early as 1941, and later photographs appear to show that the southern portion of the Property was cleared between 1941 and 1951 (see Section 4.3.1).

City directories indicate that wholesale lumber operations were conducted on the Property by Boyd Lumber Corp in 1983 and Willis Rogers & Pearson Lumber Co Inc. in 1974 and 1979. A city directory and a record from Environmental Data Resources, Inc.'s (EDR) historical automotive database (see Sections 4.3.3 and 4.1, respectively) appear to show that Liberty Gas & Diesel Service operated a general automotive repair shop on the Property as early as 2002 and as late as 2003.

Environmental reports reviewed as part of the regulatory file review indicate that decommissioning of the former mill began as early as 2000 (IT Corporation, 2000) and that the former mill facility was demolished and the site cleared by 2006 (Environmental Health Management, 2006). The current owner indicated that the lumber mill had been decommissioned and demolished when the Property was purchased by her husband in 2008, with the exception of one remaining former mill structure and the barn on the south end of the Property; that the remaining mill structure had been demolished on site; and that the Property has remained vacant and unused since his purchase, with the exception of livestock-pasturing activities on the southern portion of the Property and a recreational vehicle illegally parked on the Property at one time (see Section 5.1).

2.2.5 Current Uses of Adjoining Properties

Adjoining properties have been, and largely remain, a mix of urban residential (inside city limits), including single and multifamily housing units; rural residential (outside city limits); industrial; agricultural; public utility; and school use.

The Property is bordered by the following (see Figure 2):

- North—Jameson Street, followed by Sedro-Woolley High School to the north and a vacant, industrial lot owned by the Burlington Northern Santa Fe Railway Company (BNSF) to the northwest; and multifamily urban residences.
- South—City fire training facility, Morris Street, agricultural land, and rural residences. The Skagit River is less than a half mile to the south.

- East—South Third Street, City fire training facility, single- and multifamily urban residences, rural residences, and City solid waste recycling facility and wastewater treatment plant.
- West—vacant, commercial lots owned by the County, followed by an agricultural and rural residential property and industrial property on which Hamilton Manufacturing, and possibly BAMF Boats, currently operates.

2.2.6 Past Uses of Adjoining Properties

According to property records available online from the County assessor’s database, historical aerials, and the regulatory file review, past uses of the following adjoining properties differed from their current uses:

- A railroad track was formerly present on adjoining properties to the west, northwest, and southwest, which are now owned by BNSF, the County, and the Sedro-Woolley school district.
- The property on which Hamilton Manufacturing conducts its operations was formerly owned by Goodyear Nelson Hardwood Lumber Company, followed by Weyerhaeuser Company; and lumber mill operations, including a log dump, may have been conducted on the property.
- Goodyear Nelson Hardwood Lumber Company may have operated on one or more properties along Jameson Street and is a former leaking underground storage tank (LUST) site.
- The former Sedro-Woolley lumber mill operated on adjoining properties to the west and northwest, which are now owned by the County, the Sedro-Woolley school district, and BNSF.
- Coffland & Latting may have historically operated a towing company at 1617 Third Street, on the east adjoining properties on which the County operates its recycling facility.

2.2.7 Current or Past Uses in Surrounding Area

Current and past uses of properties in the surrounding area include a mix of urban and rural single- and multifamily residential, agricultural, commercial, and industrial. As discussed in Section 4.1 of this report, several sites in the surrounding area to the north, west, east, and south of the Property are listed in various Washington State Department of Ecology (Ecology) databases for storage and/or for potential and/or confirmed releases of petroleum products. Several automotive business operate or have operated to the north, east, and south of the Property.

2.2.8 Geologic, Hydrogeologic, Hydrologic, and Topographic Conditions

According to EDR’s record search (see Section 4.1), the dominant soil types at the Property and in the general area include the Sumas and Field silt loams, Larush and Water fine sandy loams, and urban land with various soil textures. These soil types range from poorly to moderately to well-drained. The Sumas silt loam is the most dominant soil type at the Property and is poorly drained with very slow infiltration rates. Soils are described as clayey and having a high water table or being shallow to an impervious layer.

The EDR record search (see Section 4.1) indicates that the Property is generally flat, lies at an elevation of approximately 44 feet above sea level, and is located within the 100- and 500-year flood zones for the Skagit River. The EDR report also indicates that National Wetlands Inventory wetland areas are present in the immediate vicinity of the Property. Based on this finding, and the presence of a low-lying marshy area on the Property observed during the site reconnaissance visit (see Section 2.2.2), a wetlands review was conducted (see Section 6).

The Property is located in the Skagit River Valley. According to the USGS geologic map (Sedro-Woolley South, 7.5-foot quadrangle), as accessed from the Washington State Department of Natural Resources Geologic Information Portal (WADNR, 2017), the subsurface stratigraphy is composed of Holocene deposits including alluvium, artificial fill and modified land, and peat. The alluvium consists of generally well-sorted and stratified deposits of gravel, sand, and silt, which may include rounded and subrounded lithic clasts and pumice derived from Glacier Peak lahars. The peat consists of bog, marsh, and lake deposits including fibrous to woody peat and muck; tephra from Mount Mazama is present as a layer in some bogs.

Groundwater monitoring was conducted on the neighboring property to the west, for which petroleum releases from LUSTs associated with the Sedro-Woolley Lumber Company’s former fabrication shop were previously assessed (see Section 4.2). Monitoring results indicate that groundwater is typically present between approximately 14 to 16 feet below ground surface and flows south-southeast, in the direction of the Skagit River, which is less than a half mile south of the Property.

2.3 Interior and Exterior Observations

	Observed on the Property?		Notes
	Yes	No	
Structures	X		One structure—a wooden barn with metal roof—is present on tax lot number P37656 of the Property (see Figure 2).
Roads	X		The Property is accessed from the north by Jameson Street, from the east by Third Street, and from the south by Morris Street. An asphalt-paved area, formerly used for parking, is present at the north end of the Property and is accessible from Jameson Street. Other access points are via gravel road or driveways. All vehicle access points are blocked with Ecology Blocks.

	Observed on the Property?		Notes
	Yes	No	
Potable Water Supply	X		According to the County's online assessor database, potable water is provided by the City to parcels of the Property located within the city limits.
Sewage-Disposal System	X		According to the County's online assessor database, municipal sewer service is provided by the City to parcels of the Property located within the city limits.
Hazardous Substances and Petroleum Products in Connection with Identified Uses		X	
Storage Tanks		X	
Odors		X	
Pools of Liquid	X		Small puddles of standing water were observed on the asphalt-paved area of the Property.
Drums		X	
Hazardous-Substance and Petroleum-Product Containers		X	
Unidentified-Substance Containers		X	
PCBs		X	
Heating and Cooling		X	
Stains or Corrosion		X	
Drains or Sumps		X	
Pits, Ponds, or Lagoons	X		A low-lying area was covered with grass during MFA's site reconnaissance visit. According to the Client (see Section 3), a former log pond on the Property was later filled in with wood chips. A pond appears in a historical aerial photograph from 1968 (see Section 4.3.1).
Stained Soil or Pavement		X	

	Observed on the Property?		Notes
	Yes	No	
Stressed Vegetation		X	
Solid Waste	X		Household and/or commercial waste, including garbage bags full of trash, tires, and furniture; and construction debris (wood, concrete, and rebar).
Wastewater		X	
Stormwater	X		One catch basin was observed in the asphalt-paved area of the Property. Although stormwater was not observed during the site visit, a stormwater pollution prevention plan (SWPPP) for the former Sedro-Woolley Lumber Company indicates that historically, stormwater runoff from paved areas flowed to over 20 different catch basins, located primarily in impervious areas of the Property, connected to the City storm sewer. Stormwater in pervious areas either infiltrates naturally or runs off and collects in stormwater ditches or catch basins on adjoining roadways. Historically, stormwater runoff from the former log yard discharged west-southwest to a stormwater outfall located along the former railroad line to the west.
Wells		X	
Septic Systems		X	

3 USER-PROVIDED INFORMATION

MFA provided a Client/User Questionnaire form to the Client. A copy of the questionnaire, completed by John Coleman, City planning director, is included as Appendix C. The Client is the user of this Phase I ESA.

3.1 Title Records

Title records were not provided for review.

3.2 Environmental Liens or Activity and Use Limitations

Mr. Coleman reported that, to the best of his knowledge, there were no environmental liens or activity and use limitations on the Property.

3.3 Specialized Knowledge

The Client provided no specialized knowledge regarding the Property.

3.4 Commonly Known or Reasonably Ascertainable Information

The Client provided the following information commonly known or reasonably ascertainable within the local community that is relevant to RECs in connection with the Property:

- USTs were formerly located on the Property, and at least some, and possibly all, of them had been removed.
- A former log pond on the Property has been filled with wood chips.

3.5 Valuation Reduction for Environmental Issues

The Client is unsure whether the purchase price has been affected by the presence of contamination.

3.6 Owner, Property Manager, and Occupant Information

According to the Client, the Property is owned and managed by Trigger 1, LLC, and is currently unoccupied.

3.7 Reason for Performing Phase I ESA

The Client reported that the purpose of this Phase I ESA is to determine the potential presence and extent of environmental liabilities associated with the Property to inform potential purchasers and/or property developers of constraints associated with redeveloping the Property.

4 RECORDS REVIEW

4.1 Standard Environmental Record Sources

MFA contracted EDR to search state and federal agency record sources for information regarding the Property and sites near the Property. All databases were searched using the standard approximate minimum search distances specified in ASTM E1527-13 or the search distances used by EDR, if those are greater. The sites identified by this database search are shown in the following table. A list of “orphan” sites with inadequate address information for mapping was also researched; orphan sites

found to be within the appropriate search radii are also included in this table. The EDR-generated report is included in Appendix D.

Databases Searched	Sites Listed	
	EDR Geocheck	Orphan
Approximate Minimum Search Distance: 1.0 Mile from Property Boundary		
USEPA National Priorities List Sites (NPL)	0	0
Federal Delisted NPL	0	0
USEPA Corrective Action Report (CORRACTS)	0	0
Ecology Confirmed and Suspected Contaminated Sites List (CSCSL)	13	0
Washington State Hazardous Site List (HSL)	7	0
Tribal Equivalent NPL	NA	0
Approximate Minimum Search Distance: 0.5 Mile from Property Boundary		
USEPA's Comprehensive Environmental Response, Compensation, and Liability Act Information System (CERCLIS)	0	0
Ecology Confirmed and Suspected Contaminated Sites List No Further Action (CSCSL NFA)	2	
Resource Conservation and Recovery Act Information System Non-CORRACTS Treatment, Storage, and Disposal (RCRIS-TSD)	0	0
Ecology Voluntary Cleanup Program (VCP)	2	0
Ecology Independent Cleanup Reports (ICR)	4	2
Washington Solid Waste Information System (Landfills)	2	1
Ecology Brownfield Projects	0	0
Ecology LUST Database	6	0
LUSTs on Indian Land	0	0
Tribal Databases (CERCLIS-Equivalent, Voluntary Cleanup Sites, Brownfield Sites, Landfill Sites)	0	0
CERCLIS "No Further Remedial Action Planned" (NFRAP)	0	0
United States Engineering Controls Sites List (USEC)	0	0
United States Sites With Institutional Controls List (USSIC)	0	0
Ecology Institutional Controls at Environmental Cleanup Site Information (ECSI) Sites	0	0
Ecology Engineering Controls at ECSI Sites	NA	0
Tribal Engineering/Institutional Controls	NA	0
Approximate Minimum Search Distance: 0.25 Mile from Property Boundary		
Ecology UST Database	4	0
Ecology AST Database	0	0
USTs and ASTs on Indian Land	0	0
USEPA RCRIS Large-Quantity Generator	0	0
USEPA RCRIS Small-Quantity Generator	0	0
Approximate Minimum Search Distance: Property Only		
Emergency Response Notification System (ERNS)	0	0
Ecology Underground Injection Control (UIC) Program	0	0

Based on MFA's review of the EDR report, the following sites were identified for further investigation of their potential to impact the Property (discussed further in Section 4.2):

- **Sedro-Woolley Lumber Company** at 109 Jameson Street (the Property) is listed in Ecology's ICR, VCP, and CSCSL NFA databases (facility/site identification [FSID] number 87455973). The Property was also historically listed in Ecology's LUST database and was listed in the Federal Insecticide, Fungicide, and Rodenticide Act/Toxics Substance Control Act tracking system (FTTS) for a complaint associated with PCB use and/or storage. An orphan site with a historical LUST listing was also identified as Sedro-Woolley Lumber/BNSF/Sedro-Woolley Schools located at Jameson Street and "BNRR."
- **Liberty Gas & Diesel Service** at 109 Jameson Street (the Property) is listed in EDR's historical automotive service database as a general automotive repair shop in 2002.
- **Sedro-Woolley City Sanitation** at Third and Sterling Streets is listed in Ecology's UST database (FSID number 83864339) and is located approximately 34 feet east of the Property at a higher elevation.
- **Goodyear Nelson Hardwood Lumber Co., Inc.** is identified as being located on Jameson Street, approximately 184 feet south-southwest of the Property, and at the west end of Jameson Street, approximately 546 feet northwest of the Property. Both locations are indicated as lying at a higher elevation than the Property. The company is listed in Ecology's CSCSL NFA and UST databases (FSID number 42291814).
- **Jameson Avenue Properties** at Jameson Street and the BNSF railway is listed in Ecology's CSCSL, LUST, and UST databases (FSID number 2476573) and is located approximately 300 feet north-northwest of the Property at a higher elevation.
- **Weyerhaeuser property** at 1215 Highway 9 is listed in Ecology's ICR database and is located approximately 1,160 feet west of the Property at a higher elevation.
- **Off-Property automotive-service- and petroleum-storage-related activities.** Several properties with automotive-service- and petroleum-storage-related activities located more than a quarter mile from and at a higher elevation than the Property are listed in Ecology's CSCSL, HSL, ICR, LUST, UST, and/or VCP databases.

The remaining sites have no reported releases, have reported that cleanup is complete and/or have received NFA determinations from Ecology, and/or have little potential to impact the Property, based on their proximity and/or elevation in relation to the Property.

4.2 Regulatory File Review

MFA reviewed online documentation for the sites identified above for further investigation of their potential to impact the Property, based on the EDR report (see Section 4.1). All obtained documentation is provided in Appendix E.

Sedro-Woolley Lumber Company. This site is located on the Property. Prior environmental reports obtained for the Property are discussed in Section 4.4. The EDR record search identified an FTTS

listing, which indicates a violation at the Property associated with “PCB, Use PCB, Label or Marking PCB, Failure to Maintain Records.”

Liberty Gas & Diesel Service. No Ecology records were available online for this former business. This business was listed at the Property in a historical city directory from 2003 (see Section 4.3.3); however, a general online search did not identify any information associated with this business at that location. Multiple environmental investigations were conducted at the Property from as early as 1997 through 2007, and Ecology has reviewed activities on the Property under the VCP (see Section 4.4); however, there is no mention of the presence of, or operations associated with, an automotive repair shop on the Property. Also, during an interview, the Ecology site manager indicated that the Property has remained vacant since the lumber mill closed (see Section 5.5).

Based on MFA’s review of online records for these former operations and review of the information available for the Property (see Section 4.4), potential former automotive-service activities on the Property associated with this business are not considered a REC for the Property.

Sedro-Woolley City Sanitation. Ecology UST records indicate that three USTs, installed on December 31, 1964, are located on the Sedro-Woolley City Sanitation property and that closure is in process for all three USTs. The substances stored in two of the USTs are identified as leaded gasoline and unleaded gasoline. Neither the substance stored in the third UST nor the capacities of all three USTs is identified.

Given the age of the USTs and the fact that no closure records were obtained, there is the possibility that a release from the USTs occurred at some point. A release likely would impact shallow groundwater. The USTs likely are located crossgradient of the Property, given that groundwater was identified to flow south-southeast (see Section 2.2.8); however, given the proximity of the USTs to the Property, there is the potential for groundwater impacted by a release from the USTs to migrate onto the Property.

Based on MFA’s review of the UST records for this property, petroleum impacts in groundwater from a potential release from these USTs is considered a REC for the Property.

Goodyear Nelson Hardwood Lumber Co., Inc. Ecology UST records indicate that two USTs, installed on December 31, 1964, were located on the Goodyear Nelson Hardwood Lumber Co., Inc. property. The substance contained in one of the USTs is identified as leaded gasoline. A substance is not identified for the other UST, and capacities are not identified for either UST. The UST records indicate that the USTs were removed as of a status date of August 6, 1996.

Ecology NFA records indicate that an NFA determination was made based on an initial investigation of the Goodyear Nelson Hardwood Lumber Co., Inc. property on October 3, 2011. An Ecology NFA determination letter dated May 21, 2012, indicates that an independent LUST cleanup, as documented in Ecology’s historical records and documents submitted to Ecology on August 31, 1995, has met the substantive requirements for cleanup under the Model Toxics Control Act (MTCA) and that NFA is required to address the LUST (LUST identification number 2190). The letter indicates that groundwater was not affected.

No LUST records were obtained for the Goodyear Nelson Hardwood Lumber Co., Inc. property to confirm that the USTs identified in Ecology's UST records were the subject of the LUST cleanup; however, EDR's record review did not identify any other Ecology records for the Goodyear Nelson Hardwood Lumber Co., Inc. property; therefore, it is assumed that they are the same.

The Ecology records for this UST/LUST/NFA site, appear to indicate that Ecology determined that the LUST had been cleaned up in accordance with MTCA; therefore, it is unlikely to have impacted the Property and is not considered a REC for the Property.

Jameson Avenue Properties. Ecology UST records associated with FSID number 2476573 indicate that five USTs, three installed on December 31, 1964 and two on January 1, 1966, were located on the property. The substances contained in the USTs are identified as diesel and leaded gasoline. The UST capacities are identified as 500, 750, and 10,000 gallons for the three leaded-gasoline USTs, and 750 and 10,000 gallons for the two diesel USTs. The UST records indicate that the USTs were removed as of status dates of April 8 and 9, 1993.

Ecology's LUST records associated with the same FSID indicate that a cleanup was started on April 14, 1993, as part of an independent action. However, the LUST records list the site name as Sedro-Woolley Lumber/BNSF/Sedro-Woolley Schools and list the site location as Jameson Street and BNRR, which differs from the information listed in association with the UST records for this same FSID. The LUST records indicate that contamination has been confirmed in soil and groundwater and that these media have been affected by benzene, nonhalogenated solvents, petroleum-diesel, and petroleum-gasoline.

Ecology's CSCSL records associated with the same FSID list the same site name and location as the LUST records and indicate that cleanup has been started and that LUST notification was received on April 12, 1993. The same soil and groundwater contaminants identified in the LUST records are listed. The CSCSL records also indicate that LUST reports were received on May 25, 1993; December 27, 1994; December 7, 2000; and May 17, 2004. These dates are generally consistent with reporting dates associated with LUSTs identified for the Sedro-Woolley Lumber Company site as part of the Ecology records review (see Section 4.4); however, the records reviewed in Section 4.4 of this report were associated with the FSID for the Sedro-Woolley Lumber Company (FSID number 87455973).

Based on an interview with the Ecology site manager for the Sedro-Woolley Lumber Company site (see Section 5.5), the Jameson Avenue Properties/Sedro-Woolley Lumber/BNSF/Sedro-Woolley Schools site may be associated with a different LUST than those identified in association with the Sedro-Woolley Lumber Company site. The Sedro-Woolley Lumber Company site included five LUSTS associated with a former fabrication shop, located on a property adjacent to the Property to the west and on the south side of Jameson Street. The Ecology site manager indicated that one LUST was present on the Jameson Avenue Properties/Sedro-Woolley Lumber/BNSF/Sedro-Woolley Schools site, on a property located north of Jameson Street and northwest of the Property, and that it was removed and cleaned up, but an NFA determination was not issued.

Based on MFA's interview with the Ecology site manager (see Section 5.5) and review of prior environmental reports associated with the Property (see Section 4.4), the Jameson Avenue Properties/Sedro-Woolley Lumber/BNSF/Sedro-Woolley Schools site is not considered a REC for the Property. However, as discussed in Section 4.4, LUSTs associated with the former fabrication

shop on the property adjacent to the Property to the west did not receive an NFA determination for remaining impacts in groundwater; therefore, it is considered a REC for the Property.

Weyerhaeuser property. No Ecology records were available online for this property. EDR’s record search indicates that a final cleanup report was submitted in 1991 and the contaminant is identified as petroleum. No Ecology site listing was identified for this property, which is approximately 1,160 feet crossgradient of the Property. Based on MFA’s review of the available records, an independent cleanup was conducted to address the petroleum release at this property; therefore, it is not considered a REC for the Property.

Off-Property automotive-service- and petroleum-storage-related activities. A regulatory file review was not conducted for the individual properties with automotive-service- and petroleum-storage activities located more than a quarter mile north of the Property. However, given the density of listed sites with automotive and petroleum-related activities in that area, there is the potential for area-wide groundwater impacts to be present. Such impacts would have the potential to migrate in the direction of the Property, given that it was determined that groundwater at the Property flows south-southeast. However, groundwater gradients are likely to be shallow at the Property and in the vicinity, as the local topography is generally level, and soil types in the area and at the Property consist primarily of finer-grained deposits (e.g., silts and clays) that are generally less permeable. Given this, and the distance of these properties from the Property, potential groundwater impacts originating from these properties are not likely to migrate to the Property and are not considered a REC for the Property.

4.3 Historical Use Information on Property and Adjoining Properties

MFA used the following information sources to obtain historical use(s) information.

4.3.1 Historical Aerial Photographs Review

Aerial photographs of the Property from 1941, 1951, 1954, 1968, 1975, 1981, 1990, 1998, 2005, 2006, 2009, and 2011 were obtained from the EDR and reviewed to identify historical changes to the Property and the Property’s historical uses, if any (see Appendix F).

Year of Image	Observations
1941	The majority of the Property is undeveloped and appears to be covered with trees. The northeast corner and south-central portions of the Property appear to have been cleared. The image is not clear, but there appears to be at least one structure on the north end of the Property. Adjoining properties appear to be largely undeveloped and covered with trees, with the exception that the areas to the northeast and south of the Property appear to be in residential use. What appears to be a railroad corridor runs along the western edge of the Property. The surrounding area is also largely undeveloped; however, the area to the south appears to be in agricultural use; the area to the northeast in residential use; the area to the northwest in industrial, agricultural, and residential use; and the area to the north appears to be a running track that may be associated with the Sedro-Woolley high school.

Year of Image	Observations
1951	The north-northeastern portion of the Property has been further cleared and now has several large buildings. Southern portions of the Property have been cleared of vegetation and appear to be in agricultural use; two structures are visible. The surrounding area from the east, to the south, and to the west has been significantly cleared of vegetation and appears to be in agricultural use. Several buildings now appear along the railroad corridor to the northeast of the Property.
1954	Several buildings are visible across the northern portion of the Property. Two access roads to the structures are visible; they extend from the north from Jameson Street and the east from Third Street. Additional residential buildings appear to be present at the south end of the Property. The surrounding area appears largely unchanged.
1968	There is significant storage of lumber across the northern portion of the Property, adjacent to several large buildings. A large pond is visible along the northeast-eastern edge of the Property. More vegetation has been cleared from the southern portion of the Property. To the northeast of the Property, there is another set of buildings with lumber storage and a pond. The density of buildings to the north of the Property has increased. The remaining surrounding area appears largely unchanged.
1975	The lumber storage area on the Property has increased significantly to the south through previously undeveloped land. The pond is no longer visible. The property to the east has increased its lumber storage, with logs visible in the pond. A wastewater facility is visible to the east of the Property. The surrounding area has increased in agricultural and residential use.
1981	No significant changes are visible.
1990	The quality of this image is poor. From what can be discerned, no significant changes are visible.
1998	Stored lumber appears to have been removed from the Property, along with several of the buildings along the northern portion of the Property. The log pond on the Property to the west is no longer visible and has been replaced by lumber storage. Fewer structures are visible along the railroad corridor to the northeast. The remaining surrounding area appears largely unchanged.
2005	Nearly all of the buildings from the northern portion of the Property have been removed, with the exception of one small building and several white structures along the northern and eastern boundaries of the Property, respectively. Lumber is no longer stored on the property to the east. Structures are no longer visible along the railroad corridor to the northeast, and it appears that the rail lines may have been removed. The remaining surrounding area appears largely unchanged.
2006	No significant changes are visible.
2009	No structures are visible on the Property, with the exception of one at the south end. The surrounding area appears largely unchanged.

Year of Image	Observations
2011	No significant changes are visible.

4.3.2 Sanborn Map Review

SFIMs were requested from EDR. EDR reported that SFIMs for the Property were not available (see Appendix G).

4.3.3 City Directories

EDR provided city directories for Jameson Street from 1974, 1979, 1983, 1987, 1992, 1995, 1999, 2003, 2008, and 2013; as well as for Morris Street from 2003, 2008, and 2013 (see Appendix H). A review of the city directories identified the following activities at 109 Jameson Street (the Property) as potential concerns for the Property:

- Liberty Gas & Diesel Service in 2003. Potential former operations associated with this business were not identified as a REC for the Property, based on a regulatory file review (see Section 4.2) and an interview with the Ecology site manager (see Section 5.5).
- Sedro-Woolley Lumber Company in 1992, 1995, and 1999. Sedro-Woolley Lumber Company’s operations on the Property are discussed in detail in the general site setting, other records review, and interview sections of this report (see Sections 2.2; 4.1 to 4.3; and 5, respectively). Features, operations, and historical hazardous substance releases associated with the former mill were identified as RECs for the Property, as summarized in Section 7 of this report.
- Boyd Lumber Corp in 1983. Features and operations associated with this business were likely similar in location and nature to those associated with the former Sedro-Woolley Lumber Company. Therefore, any RECs associated with this business would likely be covered by those identified in association with the Sedro-Woolley Lumber Company.
- Willis Rogers & Pearson Lumber Co Inc. in 1974 and 1979. Features and operations associated with this business were likely similar in location and nature to those associated with the former Sedro-Woolley Lumber Company. Therefore, any RECs associated with this business would likely be covered by those identified in association with the former Sedro-Woolley Lumber Company.

4.4 Prior Environmental Reports for Property

MFA submitted an Ecology records request for the former Sedro-Woolley Lumber Company site (Site) located on the Property (FSID number 87455973). The Sedro-Woolley Lumber Company historically conducted its operations on the Property and on several neighboring properties. The “Site” includes the Property, as well as any neighboring properties on which hazardous substance releases associated with the former Sedro-Woolley Lumber Company operations may have come to lie. However, only hazardous substance releases that have the potential to impact the Property were identified as RECs.

Environmental reports associated with the Site from 2007 were also provided by the Client. No prior ESAs were provided by the Client. All obtained documentation is provided in Appendix I.

Based on review of Ecology records and environmental reports for the Site received from the Client, the following is a summarized timeline of activities associated with Site discovery, listing, investigation, and cleanup.

Date	Activity
April 1993	A gasoline release in soil was identified during the removal of five USTs associated with the former fabrication shop, which was located on the property adjoining the Property to the west. Approximately 60 cubic yards of petroleum-contaminated soil (PCS) was removed; confirmation samples were collected. PCS was left in-place due to infrastructure constraints, and was interpreted to extend beneath the former fabrication building. Groundwater impacts were not evaluated. ¹
August 1993	A SWPPP was prepared for the Site that identified existing potential and future pollutant sources, including operation and maintenance of hydraulic and heavy equipment; bulk petroleum product storage; loading and unloading of petroleum products from aboveground tanks; log yard operations; spills from petroleum fueling stations; and outdoor vehicle and equipment maintenance, washing, and steam cleaning. ²
July 1993	A subsurface investigation was conducted to evaluate the extent of PCS remaining in association with the fabrication shop area LUSTs, which were located on the property adjoining the Property to the west. Remaining PCS was determined to be localized in nature. Due to infrastructure constraints, no further excavation was recommended. A recommendation was made to allow the PCS to naturally biodegrade, and a conditional NFA determination was requested from Ecology. ³
December 1994	A report was issued indicating that PCS from the former fabrication shop area LUST excavation, located on the property adjoining the Property to the west, was treated onsite via aeration. This PCS was subsequently buried in an area at the southwest corner of the sawmill, and capped with one foot of clean fill material. Portions of the buried soil may be located on the Property. Soil samples were collected from within and below the buried material and analyzed for hydrocarbon identification. Diesel was detected in one of the samples. Samples were not analyzed for other chemical constituents typically associated with PCS. Based on the sample results, it was determined that the soil met a Class 2 standard for reuse as fill in commercial or industrial areas. ⁴
December 1994 to June 1995	In response to complaints alleging that drums of hazardous waste were buried at the Site near a hydrant on the Property, Ecology requested hazardous waste disposal documentation from the Sedro-Woolley Lumber Company. Ecology also recommended that a subsurface survey and exploratory excavation be conducted to address this complaint, or the Site would be listed in Ecology's CSCSL. Sedro-Woolley Lumber Company provided documentation of its waste disposal activities and conducted a subsurface investigation to evaluate the allegations. Based on the findings, the company requested an NFA determination from Ecology. ^{5,6,7}

Date	Activity
June 1995	A report was issued documenting findings from a ground-penetrating radar (GPR) survey and subsurface soil investigation, including sampling from test pits, conducted in a 0.8-acre area near the hydrant on the Property. No buried drums were found and no indications of soil contamination were identified in the test pits. ⁸
June 1998	A Phase II ESA was conducted supporting a potential sale of the Property. The report identified the following environmental concerns: log yard debris in the former log yard area, located in both on- and off-Property areas; PCS and petroleum related groundwater contamination in the former fabrication shop LUST area, located off-Property; and PCS in the helipad, heavy equipment boneyard, fueling station, debarker loader, maintenance shop, former shake mill, and storm drain outfall areas. The former debarker loader, maintenance shop, and shake mill were located on the Property. Lead-based paint and asbestos were also identified in several of the buildings on the Property. ⁹
October 1998	The Site was entered into Ecology's VCP. ¹⁰
November 1999	A report was issued summarizing the additional investigation and independent cleanup actions conducted in several areas of the Site. The work was conducted under the VCP to address areas of contamination requiring remediation, as identified in the Phase II ESA. Based on investigation results from sampling conducted in the helipad (off-Property) and maintenance shop (on-Property), no cleanup action was recommended; the maintenance shop area investigation consisted of one boring. The debarker loader stockpile (on-Property) was removed and disposed of off-site; however, although it was noted in the 1998 Phase II ESA report that the stockpile was stored on top of asphalt, it was not clear how the stockpiled soil was managed while on site for over a year or more. Soil samples were not collected in the vicinity to verify contaminants did not run off to the surrounding area. Cleanup, consisting of soil excavation with off-site disposal or on-site treatment and reuse, was conducted in the former heavy equipment boneyard (off-Property); fueling station (off-Property); and shake mill (on-Property) areas. Confirmation samples were not collected from the sidewalls of the former shake mill excavation. Investigation and confirmation samples analyzed for petroleum were treated with a silica gel–acid cleanup solution before analysis and results were evaluated. Analysis and results were evaluated consistent with Ecology's 1997 <i>Interim Interpretive and Policy Statement, Cleanup of Total Petroleum Hydrocarbons</i> (Interim TPH Policy), which is now obsolete. Groundwater was not assessed. Based on the results of the investigation and cleanup, an NFA determination was requested from Ecology, excluding the former fabrication shop LUST area (off-Property). ^{11,12}
November 2000	A report is issued detailing the results of groundwater monitoring activities in the former fabrication shop LUST area (off-Property). Remaining petroleum impacts were identified in groundwater and additional monitoring is recommended. ¹³
January 2001	Ecology issued a letter indicating that no further active remediation was required at the site, but that groundwater monitoring should continue. ¹⁴

Date	Activity
May 2003 to March 2004	Three reports were issued summarizing the results of quarterly air and groundwater monitoring activities, which were conducted between October 2001 and March 2004 in association with the off-Property, former fabrication shop LUST area. The reports indicate that a soil vapor extraction/air sparge system was installed to address petroleum related contamination remaining in groundwater. Benzene and gasoline concentrations in groundwater remained at concentrations above applicable cleanup criteria; therefore, continued monitoring and treatment was recommended. ^{15,16,17}
September and December 2006	A risk assessment was conducted to evaluate human health risks associated with groundwater contamination remaining in the off-Property, former fabrication shop LUST area. The report concluded that soil and surface water were not affected and ecological receptors were not impacted. It also concluded that benzene concentrations in groundwater pose a drinking water risk and a vapor intrusion risk into dwellings, though no current drinking water uses were identified. The report indicated that institutional controls preventing use of groundwater as drinking water and a covenant restricting residential use of the Site would address the human health risks. Subsequent to issuance of the report, a letter was issued to Ecology requesting a NFA determination. The report and letter reference groundwater monitoring events conducted in May, October, and November 2006. MFA did not obtain reports related to those sampling events. ^{18,19}
April 2007	Ecology issued an NFA determination pertaining to PCS cleanups conducted in the following areas: maintenance shop (on-Property); debarker loader stockpile (on-Property); heavy equipment boneyard (off-Property); former fueling station (off-Property); and former shake mill (on-Property). The NFA determination did not address groundwater impacts in the off-Property, former fabrication shop LUST area. ²⁰
October 2007	A report was issued detailing findings of an environmental information review conducted for the Site. The purpose of the review was to assess the potential for contamination remaining on a portion of the Site that was being considered for purchase (the “subject property,” which appeared generally consistent with the Property parcel number P37648 and those parcels located north of that parcel [see Figure 2]). The report concluded that petroleum contamination in soil and groundwater on the subject property had been adequately cleaned up to unrestricted land use cleanup criteria. A determination on the regulatory status of woodwaste was withheld. Contaminated sites on the adjacent property (i.e., the former fabrication shop site, helipad, and heavy equipment boneyard sites) were determined not to present an environmental risk to the subject property. ²¹

Date	Activity
October 2007	A report was issued detailing results of soil sampling conducted at the Site. The sampling was conducted to evaluate potential areas of PCS, as identified in a September 7, 2007 memorandum from GeoEngineers to Larry Carter. MFA did not obtain a copy of the GeoEngineers memorandum for review. The GeoEngineers memorandum reportedly referenced results of a Phase II ESA conducted in 2005, during which concentrations of gasoline, diesel, and heavy oils were identified above MTCA Method A cleanup levels in soil. Samples were collected from borings and test pits co-located with the former GeoEngineers investigation locations, most of which appeared to be located on the Property in the former log yard. These samples were analyzed for volatile/extractable petroleum hydrocarbons, using a silica gel-acid cleanup method, so that concentrations could be compared to site-specific MTCA Method B cleanup levels. It was determined that all concentrations met MTCA Method B criteria for unrestricted land use; however, the appendix, including the site-specific MTCA Method B calculations, was not provided for review. ²²
2008	Ecology conducted an initial investigation on the Property to evaluate a claim alleging that contamination from the Property was impacting a neighbors' property, and that waste drums were buried in the wetland area on the Property. Neither of these allegations was confirmed by Ecology's investigation, and no further investigation was conducted. ²³

¹Pegasus. 1993. Decommissioning status report. Pegasus Professional Services Corporation. Wilsonville, Oregon. May 19.

²Hart Crowser. 1993. Storm water pollution prevention plan, Sedro-Woolley Lumber Company. Hart Crowser, Inc. Portland, Oregon. August 1.

³Pegasus. 1993. Site characterization report, Sedro-Woolley Lumber Company. Pegasus Professional Services Corporation. Wilsonville, Oregon. August 2.

⁴Dirt. 1994. Petroleum impacted soil disposition report. Dirt, Inc. Salem, Oregon. December 20.

⁵Sedro-Woolley Lumber Company. 1994. Letter (re: waste disposal documentation) to G. Colburn, Department of Ecology from B. McKinley, Sedro-Woolley Lumber Company. December 19.

⁶Ecology. 1995. Letter (re: allegation of buried drums at your facility) to B. McKinley, Sedro-Woolley Lumber from N. Peck, Washington State Department of Ecology. April 18.

⁷WTD Industries. Letter (re: Sedro-Woolley Lumber Co.) to N. Peck, Department of Ecology from R. Riecke, WTD Industries, Inc. Portland, Oregon. June 30.

⁸Hart Crowser. 1995. Letter (re: geophysical survey and subsurface investigations report, Sedro-Woolley Lumber Co.) to L. Arnoldi, WTD Industries, Inc. from G. Kupillas, Hart Crowser, Inc. Lake Oswego, Oregon. June 19.

⁹CWEC. 1998. Letter (re: Sedro-Woolley Lumber Company facility Phase II ESA summary of findings and remediation cost estimate) to J. Burns, WTD Industries from R. Roche, Century West Engineering Corporation. Portland, Oregon. June 10.

¹⁰Ecology. 1998. Letter (re: request for assistance, Sedro-Woolley Lumber) to R. Riecke, Sedro-Woolley Lumber from L. Lindwall, Department of Ecology. Bellevue, Washington. October 6.

¹¹TreeSource. 1999. Letter (re: results of site investigation and request for "no further action," Sedro-Woolley Lumber Co.) to R. Timm, Washington State Department of Ecology from G. Patrick, TreeSource Industries, Inc. Portland, Oregon. November 1.

¹²IT Corporation. 1999. Soil investigation and remediation report, TreeSource Industries, Inc., lumber mill. The IT Corporation. Bothell, Washington. November 4.

¹³IT Corporation. 2000. Letter (re: results of groundwater monitoring activities at the Sedro-Woolley Lumber Company facility) to G. Patrick, TreeSource Industries, Inc. from J. Lower, IT Corporation. November 13.

- ¹⁴Ecology. 2001. Letter (re: Sedro-Woolley Lumber, 109 Jameson Avenue, Sedro-Woolley, Washington Voluntary Cleanup Program [VCP] review) to T. Dykema, City of Sedro-Woolley Planning Department from J. Hickey, Washington State Department of Ecology. Bellevue, Washington. January 17.
- ¹⁵EGR. 2003. Letter (re: former Sedro-Woolley Lumber Mill, quarterly groundwater sampling April 2003) to L. Mick, TreeSource Industries from T. Murphy, EGR & Associates, Inc. Eugene, Oregon. May 22.
- ¹⁶EGR. 2003. Letter (re: former Sedro-Woolley Lumber Mill, quarterly groundwater sampling November 2003) to L. Mick, TreeSource Industries from T. Murphy, EGR & Associates, Inc. Eugene, Oregon. December 19.
- ¹⁷EGR. 2004. Letter (re: former Sedro-Woolley Lumber Mill, quarterly groundwater sampling March 2004) to L. Mick, TreeSource Industries from T. Murphy, EGR & Associates, Inc. Eugene, Oregon. March 30.
- ¹⁸EHM. 2006. Residual health risk assessment, Sedro-Woolley Mill – former fabrication shop. Environmental Health Management, Inc. Lake Oswego, Oregon. September 18.
- ¹⁹Allan Mick Environmental Services. 2006. Letter (re: independent remedial action: VCP #NW0137 Sedro-Woolley Lumber Co., 109 Jameson Ave. Sedro-Woolley WA 98284) to R. Timm, Washington State Department of Ecology from A. Mick, Allan Mick Environmental Services. Scappoose, Oregon. December 5.
- ²⁰Ecology. 2007. Letter (re: no further action determination under WAC 173-340-505[5] for the following hazardous waste site: Sedro-Woolley Lumber) from R. Timm, Washington State Department of Ecology to A. Mick, TreeSource Industries. Bellevue, Washington. April 5.
- ²¹EHM. 2007. Environmental information review, Sedro-Woolley Mill site. Environmental Health Management, Inc. Lake Oswego, Oregon. October 18.
- ²²EHM. 2007. Soil sampling and analysis, Sedro-Woolley Mill site. Environmental Health Management, Inc. Lake Oswego, Oregon. October 28.
- ²³Ecology Integrated Site Information System. 2008. Site data summary as of 8/13/2008. Washington State Department of Ecology. August 13.

4.5 City-Provided Environmental Reports

MFA submitted a records request to the City for documentation associated with the Property and adjoining properties. Documents were received from the City following completion of the document reviews discussed above; therefore, the results of the City-provided document review are discussed separately in this section.

Documents received from the City that MFA determined to be relevant to understanding the potential for RECs at the Property are discussed in this section. City-provided documents that duplicated information reviewed as part of the Ecology- and Client-provided document reviews (see Section 4.4) or that MFA determined not to be relevant to identifying potential RECs at the Property are not discussed.

The City-provided documents were provided as hard copies. Therefore, copies of the documents are not provided in this report. References to the documents reviewed are provided in the following discussion, which is organized by the property address with which the documents are associated.

1400 and 1404 Third Street. These addresses appear to be associated with the apartment complex adjoining the Property to the northeast, as referenced in Section 2.2.2 of this report and as shown in Figure 2. No records were identified in association with these property addresses as part of the EDR record search (see Section 4.1).

Correspondence between a Mr. Orland R. (“Terry”) Cohn and Tom Oakes, City Fire Chief/Building Official or the City Building Department, dating from November 9, 1988 to January 25, 1990, indicate

that USTs were present on the property located at 1400 Third Street (Cohn, O.R., 1988a and 1988b, 1990; Oakes, T., 1988a and 1988b). Correspondence from Mr. Cohn, who was presumably the owner of the property at that time, indicates that USTs are located on the property that were formerly “pumped clean” and that he proposed to fill them in-place (O.R. Cohn, 1990).

A copy of a table showing details for tank removal permits issued by the Sedro-Woolley Fire Department was provided by the City. The table indicates that a permit was issued for tank removal at 1404 South Third Street on January 16, 2004.

No documentation or records were provided that indicated whether the USTs located at 1400 and/or 1404 Third Street were closed-in-place or removed; the number of USTs present; or the UST contents, years of usage, or capacities.

An environmental review report was prepared for the apartment property located at 1404 Third Street for Mr. Charlie Chesterfield, who is identified as the owner of the property in the report (Whitman Environmental Sciences [Whitman], 2000). The report identifies that a former gasoline station was located on an adjacent property that was under the same ownership as the subject property, as defined for the purposes of their review, but that is not included in the subject property. The former gasoline station property was identified as being located “on a rectangular property cut out of the northeastern corner of the subject site at the intersection of Fidalgo and Third Streets.” The location of the former gasoline station property is unclear from this description, but it could possibly be the property located at 1400 Third Street on which USTs were identified, as discussed above.

As part of the 1404 Third Street environmental review (Whitman, 2000), two borings were hand-augered on the subject property to a depth of approximately 16 feet below ground surface (bgs) to evaluate potential impacts associated with the former gasoline station on the adjacent property. The report indicates that no odors or discoloration were noted in the soil from the borings. Soil samples were collected, but not analyzed. A groundwater sample was collected from one of the borings and analyzed for gasoline-related chemicals, but none were detected and the former gasoline station was determined not to be a source of contaminants to the subject property. However, it is unclear where the former gasoline station was located in reference to the subject property and to the Property. The property description was unclear and no maps or site plans were provided in the report showing the relation of the properties or the locations of the borings. It is possible that the former gasoline station was located upgradient of a portion of the Property and downgradient of the groundwater sample location. Also, details on the collection and preservation of the groundwater sample were not included in the report; therefore, MFA was unable to evaluate the quality and usability of the sample results provided.

Based on MFA’s review of the documents provided, the potential exists for soil and/or groundwater contamination associated with USTs located on the 1400 Third Street property, and/or the former gasoline station located adjacent to the 1404 Third Street property, to impact the Property. Therefore, they are considered RECs for the Property.

1617 Third Street. A preliminary Phase II ESA report was prepared for the “Latting” property located at 1617 Third Street on behalf of the City, who was identified as considering acquisition of the property (BEK Purnell Engineering, Inc., 1998). The report indicates that the property was formerly used as a fuel bulk storage facility and that ASTs were formerly present on the property. Six test pits were

excavated on the property to depths ranging from three to 12 feet bgs to evaluate potential petroleum impacts in soil associated with the former fuel storage operations. A groundwater sample was also collected from a monitoring well located on the adjacent wastewater treatment plant property. Soil samples collected from four of the test pits and the groundwater sample were analyzed for petroleum related chemicals. Page 5 of the report, which appears to discuss the soil and groundwater analytical results and part of the recommendations section, was not provided by the City. However, this is not considered a significant data gap since the laboratory report was provided and summary of recommendations based on the findings. The laboratory report attached to the report indicates that the chemicals analyzed for in the groundwater sample were not detected and a table provided in the report indicates that diesel was detected in soil. Additional work, including further test pit excavation and groundwater monitoring well installation, are recommended at the end of the report.

A Phase I ESA report was prepared for the property located at 1617 Third Street on behalf of the City Solid Waste Department (BEK Engineering & Environmental, Inc., 1998). The report indicates that Union Oil Company operated a bulk fuel plant on the property from 1924 to 1980 and Coffland Motors operated an automobile repair shop on the property from 1983 to 1990. The report identifies USTs at the Sedro-Woolley City Sanitation site located at Third and Sterling Streets as potential sources of off-property contamination, but did not identify the USTs as RECs for the property based on an interview with the Solid Waste Director for the City who indicated that the USTs had been removed and that no contamination was observed at the time of removal. However, no records documenting the removal were provided. Other potential off-property contamination sources were identified, including former lumber mill operations on the Property, but no off-property RECs were identified. Potential historical leaks and spills from tanks and distribution lines associated with the former bulk fuel plant were identified as a REC for the property and additional soil and groundwater investigation was recommended. No records were provided indicating whether additional investigation was conducted at the property.

Based on MFA's review of the City-provided documents for the property located at 1617 Third Street, the potential for petroleum impacts in groundwater from USTs on the neighboring Sedro-Woolley City Sanitation property to impact the Property is retained as a REC for the Property, and the potential for petroleum impacts in groundwater from former bulk fuel plant and automobile repair operations on the 1617 Third Street property to impact the Property is considered a REC for the Property.

109 Jameson Street (the Property). City email correspondence was provided indicating that the potential for contamination in the Jameson Street right-of-way associated with the former Sedro-Woolley Lumber Company site was identified during the City's Jameson Arterial Extension to SR 9 project. A letter report indicates testing was conducted to evaluate the potential for soil contamination on the project site. Widener & Associates (2016) collected soil samples from test pits associated with the Jameson Arterial Extension to SR 9 project site. The samples were analyzed for diesel, heavy oils, and metals. While some of the chemicals analyzed were detected in the samples, it was determined that none of the chemicals analyzed exceeded MTCA cleanup levels for unrestricted land use. Based on this review, soil contamination in the project site is not considered to be a REC for the Property.

A letter report was provided that indicates that soil samples were collected and analyzed from test pits excavated in the northwest corner of the Property as part of a geotechnical investigation after a petroleum hydrocarbon odor was identified in wood debris encountered in the test pits (GeoTest Services, Inc. 2007). The report indicates that "light oil product" in the samples was below the

regulatory cleanup threshold and that heavy metal concentrations were found to be “normal.” No documentation indicating laboratory analytical methods, detected concentrations, chemical analytes, or cleanup levels used, and no map was provided with the test pit locations. The report identifies the detection of contaminants in the samples; however, adequate information was not provided to review the results. Therefore, based on MFA’s review of the information provided, potential soil contamination in the northwest corner of the Property is considered a REC.

An NFA determination letter from Ecology for gasoline-range hydrocarbon and “BTEX” (benzene, toluene, ethylbenzene, and xylenes), associated with the former fabrication shop of the Sedro-Woolley Lumber Company, in soil and groundwater at the Sedro-Woolley High Property, tax lot parcel number P111170, which is located northeast of the Property on the north side of Jameson Street (Ecology, 2004). This NFA determination letter was not provided in the Ecology records review (see Section 4.4); however, the NFA determination applies only to that one tax lot indicated in the letter. Based on the records reviewed, an NFA determination has not been issued for groundwater impacts associated with the former fabrication shop on other tax parcels. Therefore, remaining groundwater impacts have the potential to impact the Property and are retained as a REC for the Property.

Sedro-Woolley fire department records document response actions for two fires at the Property: a commercial structure fire and burning furniture. Carcinogenic and toxic chemicals can be present in burned wood products. However, all buildings at the Property have been demolished, with the exception of the barn structure at the south end (see Section 2.2.3) and the building demolition debris observed on the Property consisted of concrete and rebar; large quantities of burned wood were not observed on the Property. Therefore, the potential presence of chemical byproducts associated with burned wood on the Property is considered a de minimis condition.

5 INTERVIEWS

5.1 Interview with Owner

Ms. Heather Good of MFA was directed to Ms. Barbara Reyers, owner of Trigger 1, LLC and the Property, for general and site-specific information regarding the Property. Ms. Reyers inherited the Property from her deceased husband, Wilbur Wridge (owner of Fire Ridge LLC, a previous owner), who purchased the Property in 2008. Ms. Reyers indicated that, to her knowledge, there were no pending, threatened, or past litigation or administrative proceedings relevant to hazardous substances or petroleum products on the Property. She was aware of no notices from any government agency regarding any possible violation of environmental laws, or of possible liability relating to hazardous substances or petroleum products relative to the Property. According to Ms. Reyers, there are no environmental liens on the Property.

Ms. Reyers indicated that one structure may have been present on the Property at the time her husband purchased it. The structure, a building associated with the former lumber mill, was later demolished in-place. She indicated that aside from remnants of the former lumber mill structures, including concrete pads, debris, and an in-ground vault, the only remaining structure on the Property is a barn. The barn is located on the south end, which is associated with agricultural land (two parcels of the

Property) that is leased to Jim Pinelli for cattle pasturing. Ms. Reyers indicated that historically, a log pond may have been located on the Property. She also indicated that access to the Property is largely uncontrolled and there have been unauthorized uses, including illegal dumping and a recreational vehicle camped out for a brief time. She was aware of no identified wetland areas, monitoring wells, or ASTs/USTs on the Property. Ms. Reyers indicated that a lumber mill formerly operated on the Property, but that it was demolished and removed before her husband purchased the Property. She noted that the Property has remained vacant and unused since her husband's purchase.

5.2 Interview with Key Site Manager

MFA interviewed Ms. Barbara Reyers, the Property owner and current site manager (see Section 5.1).

5.3 Interview(s) with Occupant(s)

The Property is currently vacant.

5.4 Interview(s) with Previous Operator(s), Owner(s), and Occupant(s)

Contact information for previous operators, owners, and occupants was not provided.

5.5 Interview(s) with State and/or Local Government Officials

On October 18, 2017, Ms. Heather Good of MFA interviewed Mr. Ronald Timm, the Ecology site manager for the Sedro-Woolley Lumber Company site. Mr. Timm indicated that he was not aware of any area-wide contamination issues in the surrounding area. He also indicated that he does not recall Liberty Gas & Diesel operating on the Property and indicated that, to the best of his knowledge, the Property has remained vacant and unused since the lumber mill closed.

Mr. Timm noted that he had not conducted any work on the Property for at least 10 years since he issued an NFA determination in 2007. Therefore, his recollection of activities on the Property may not be entirely clear. He did indicate that he considers the silica gel-acid cleanup method for petroleum analyses in soil to be widely accepted within Ecology and appropriate for use at the Property, particularly in shallow soil with a higher organic-matter content. He also indicated that the Interim TPH Policy that was used to evaluate the sufficiency of soil cleanup actions at the Property is comparable to MTCA Method B unrestricted land use cleanup levels.

Mr. Timm indicated that he was not aware of any environmental covenants or institutional controls on the Property.

Mr. Timm indicated that, to the best of his knowledge, PCB analyses were not included during previous site investigations, and that he was not aware of any PCB sources on the Property.

According to Mr. Timm, the Sedro-Woolley Lumber Company conducted cleanup actions on an adjoining property owned by BNSF, which was later quit-claimed to the County. He indicated that the former Sedro-Woolley Lumber Company owner had an easement on the formerly BNSF-owned

property that he mistook for ownership. As part of cleanup actions, which included installing a soil vapor extraction (SVE) system to treat gasoline and diesel in groundwater, an investigation was conducted on the north side of Jameson Street, on BNSF property, to identify a potential source. A LUST was identified on the north side of Jameson Street, but the release was heavy oils, which were not attributable to the gasoline/diesel groundwater plume on the south side of Jameson Street. He indicated that BNSF later quit-claimed property on the north side of Jameson Street to the Sedro-Woolley school district.

Mr. Timm indicated that, after a determination that contamination likely did not extend beneath the Jameson Street right-of-way, the site on the north side of Jameson was listed separately from the Sedro-Woolley Lumber Company Site. This site was listed as the Jameson Avenue Properties/Sedro-Woolley Lumber/BNSF/Sedro-Woolley Schools site (FSID 2476573). He indicated that, to the best of his knowledge, contamination on the Jameson Avenue Properties/Sedro-Woolley Lumber/BNSF/Sedro-Woolley Schools site had been adequately addressed—a UST removal and soil cleanup action was conducted that resulted in clean excavation sidewalls—but that a potentially liable party had not come forward; therefore, an NFA determination has not been issued.

Mr. Timm could not clearly recall the details of whether the NFA determination he issued for the Sedro-Woolley Lumber Company site included the groundwater plume that was being treated by the SVE system. MFA did not identify any NFA records associated with the plume (i.e., the former fabrication shop area LUST release, as discussed in Section 4.4). He indicated that he was not aware of any recent cleanup actions at the Sedro-Woolley Lumber Company site. He also noted that cleanup after the bankruptcy closure of the mill was managed by an environmental consultant and funded by a bankruptcy trust, which was set up to fund the cleanup work. He indicated that, to the best of his knowledge, once the trust funds had been exhausted, no additional work would be completed by the former Sedro-Woolley Lumber Company.

5.6 Interview(s) with Owners or Occupants of Adjoining or Nearby Properties

Interviews with owners or occupants of adjoining or nearby properties are required if those properties have been abandoned and have evidence of potential unauthorized uses, or evidence of uncontrolled access. Adjoining properties do not fit this description; therefore, interviews of these neighbors were not conducted.

6 WETLAND REVIEW

MFA conducted a limited wetland review for the Property to evaluate the potential presence of apparent jurisdictional waters of the United States (U.S.), including wetlands, as defined and regulated by federal authority under 33 CFR Parts 320-330. This review may not identify areas designated as wetlands by state or local agencies. Wetlands are “those areas that are inundated or saturated by surface or groundwater at a frequency and duration to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (Federal Interagency Committee for Wetland Determination, 1989).

MFA reviewed the following resources to evaluate the potential presence of jurisdictional waters of the U.S., including wetlands, on the Property:

- Topographic Map—The USGS 7.5-minute topographic map of the Property was reviewed to identify drainages or other potential waters of the U.S. within the Property. A portion of the Sedro-Woolley South Quadrangle can be seen on Figure 1. Based on the USGS map, water bodies are not depicted as occurring on the Property.
- National Wetland Inventory Map—National Wetland Inventory (NWI) data for the Property were reviewed to identify potential wetland areas. NWI data for the Property were published by the U.S. Department of the Interior’s Fish and Wildlife Service¹ and depict possible wetland areas, based on stereoscopic analysis of high-altitude aerial photographs. The review of the NWI data does indicate potential wetland areas on the Property.

NWI map data for the Property are provided in Appendix J. The NWI map indicates two potential wetland areas on the Property: freshwater forested/shrub wetland on the northern half of the Property; and freshwater emergent wetland on the southern half of the Property. During the site reconnaissance visit (see Section 2), MFA observed a low-lying marshy area with thick, grassy vegetation. This area corresponds to the area indicated as potential freshwater forested/shrub wetland, as shown on the NWI map.

MFA also reviewed a wetland assessment report for the Property that was provided as part of the City records request (see Section 4.5). The report indicates that ten wetlands are located on the Property (Wetlands, Inc., 2009).

7 FINDINGS AND OPINIONS

7.1 Recognized Environmental Conditions

ASTM E1527-13 defines RECs 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.

Based on MFA’s review of historical records for the Property, in particular prior environmental reports (see Section 4.4), the following RECs were identified for the Property:

¹ <http://www.fws.gov/wetlands/Data/Mapper.html> (accessed October 13, 2017).

REC	Description
Potential petroleum impacts in groundwater from USTs on the neighboring Sedro-Woolley City Sanitation property	Ecology UST records indicate that three USTs, installed on December 31, 1964, are located on the neighboring Sedro-Woolley City Sanitation property and that closure is in process for all three (see Section 4.2). Given the age of the USTs and the fact that no closure records were obtained, there is the possibility that a release from the USTs occurred at some point. A release likely would impact shallow groundwater. The USTs likely are located crossgradient of the Property, given that a south-southeast groundwater flow direction was identified (see Section 2.2.8). However, given the proximity of the USTs to the Property, there is the potential for groundwater impacted by a release from the USTs to migrate onto the Property.
Potential hazardous-waste-containing wood debris in the former log yard	It is possible that hazardous substances are mixed in with the untreated woodwaste in the former log yard. Soil investigations conducted in the former log yard area identified the presence of petroleum hydrocarbons above MTCA Method A cleanup levels, but below site-specific MTCA Method B cleanup levels. Site-specific cleanup level calculations were not provided for review to verify findings, and it was not clear if the soil impacts were close enough to the water table to require collection of groundwater samples. Therefore, there are still potential soil and/or groundwater impacts on the Property associated with hazardous waste material mixed in with wood debris in the former log yard area.
Potential PCB release(s) to shallow soil in former mill operational areas	An FTTS listing identified a violation at the Property associated with “PCB, Use PCB, Label or Marking PCB, Failure to Maintain Records,” as identified during the EDR record search (see Section 4.1). Based on that finding, and the fact that PCBs were not evaluated during previous investigations at the Property (see Section 5.5), there is the potential for a PCB release(s) to shallow soil in the former active mill operation areas.
Groundwater impacts associated with LUSTs in the former fabrication shop area	No documentation was provided to confirm that groundwater impacts remaining in the former fabrication shop LUST area had been cleaned up to the requirements of MTCA, or that an NFA determination had been issued. The most recent sampling results obtained, from 2006 (see Section 4.4), identified MTCA cleanup level exceedances. A risk assessment conducted in 2006 identified vapor intrusion as a concern within an approximately 100-foot radius of the plume, and identified drinking water exposure as a human health risk. It is not clear if contaminated groundwater or soil vapor associated with the release has migrated onto the Property.
Buried and capped former treatment cell soil	Soil removed from the former fabrication shop LUST area on the neighboring property excavation was treated on that property. This soil was later buried in an area to the southwest of the former sawmill, which may be located on the Property. Chemical constituents associated with petroleum releases were not analyzed and may remain in subsurface soil, and if present, may have leached to groundwater.

REC	Description
PCS associated with former maintenance shop	A determination that no cleanup action was needed to address PCS in the former maintenance shop area was based on samples collected from one soil boring (see Section 4.4). Although an NFA determination was issued for diesel and oil in soil near the maintenance shop, the potential exists for PCS remaining in the uninvestigated surrounding area. If PCS is present, there is the potential for associated impacts to the underlying groundwater.
PCS associated with former debarker loader stockpile	The former debarker loader stockpile was removed and disposed of off site and an NFA determination was issued (see Section 4.4). However, although it was noted in the 1998 Phase II ESA report that the stockpile was stored on top of asphalt, it was not clear how the stockpiled soil was managed while on site for over a year. Soil samples were not collected in the vicinity to verify that there had been no runoff of contaminants to the surrounding area. Therefore, the potential exists for PCS remaining in shallow soil in any unpaved areas surrounding the former stockpile.
PCS associated with former shake mill	Sidewall confirmation samples were not collected during the PCS removal cleanup action conducted in the former shake mill area (see Section 4.4). While an NFA determination was issued for diesel and oil in soil in the former shake mill area, the information provided does not confirm that the lateral extent of PCS was removed. Therefore, there is the potential for shallow PCS remaining in the area surrounding the former shake mill excavation area.
Petroleum-impacted groundwater from former fueling station, helipad, and heavy equipment boneyard areas on the neighboring property	An NFA determination was issued for PCS in the former fueling station, helipad, and equipment boneyard areas on the neighboring property to the west; however, groundwater was not assessed as part of the investigation and cleanup actions in these areas and cleanup determinations were made based on limited data (e.g., one boring the in helipad area)(see Section 4.4). Soil excavation in the former fueling station area extended to a depth of 15 feet below ground surface, which is within the range of water table elevations identified for the Property (see Section 2.2.8). Therefore, the potential exists for petroleum impacts in groundwater associated with these areas to migrate beneath the Property.
Lead and asbestos in building demolition debris and underlying soil	During the 199 Phase II ESA (see Section 4.4), lead-based paint was identified in small areas of the maintenance shop, and asbestos was identified in several buildings. Demolition debris from a former building(s) is present on the Property. There is the potential that lead and asbestos are present in the debris piles and, since the piles appear to be located on bare ground, that they were transported to and accumulated in the underlying soil.

In addition, based on MFA's review of historical records provided by the City for the Property and adjoining properties (see Section 4.5), the following RECs were identified for the Property:

USTs and a former gasoline station at 1400 and 1404 Third Streets. There is the potential for petroleum-related contamination to have migrated into soil and/or groundwater on the Property as a

result of potential releases(s) associated with a former gasoline station and/or USTs located on these neighboring properties. The USTs may have been associated with the former gasoline station; however, sufficient documentation was not provided to confirm the location of either the USTs or the former gasoline station or to confirm the proper closure of the USTs.

Former bulk fuel plant and automobile repair operations on the 1617 Third Street property.

There is the potential for petroleum-related contamination in groundwater on the property associated with historical operations that, if present, could migrate onto the Property.

Potential petroleum- and metals-related contamination in soil in the northwest corner of the Property. Petroleum-related chemicals and heavy metals were detected in soil from test pits excavated in the northwest corner of the Property, but adequate information was not provided to review the results.

7.2 Historical Recognized Environmental Conditions

ASTM E1527-13 defines historical RECs (HRECs) as a past release of any hazardous substances or petroleum products that has occurred in connection with a property and that has been addressed to the satisfaction of the applicable regulatory authority, or meets unrestricted use criteria established by a regulatory authority, without the property being subjected to any required controls.

Based on MFA's review of historical records for the Property, in particular prior environmental reports (see Section 4), the following HRECs were identified for the Property:

Diesel and oil in soil at the former shake mill. A cleanup was conducted to address PCS in the former shake mill area and an NFA determination was issued. Therefore, PCS within the boundaries of the excavation was addressed.

Buried waste drums in the vicinity of the hydrant. An allegation that hazardous waste drums were buried in an area near the hydrant on the Property was evaluated via GPR survey and subsurface soil investigation. No impacts were identified in the approximately 0.8-acre area surrounding the hydrant. Therefore, the potential presence of waste drums in that area was addressed.

7.3 Controlled Recognized Environmental Conditions

ASTM E1527-13 defines controlled RECS (CRECs) as resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority.

No CRECs were identified on the Property.

7.4 De Minimis Conditions

A de minimis condition, as defined by ASTM E1527-13, generally does not present a threat to human health or the environment, and generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

MFA identified the following de minimis conditions on the Property:

Leachate from the former log pond and wood debris in the former log yard. Historical aerial photographs (see Section 4.3.1), user-provided information (see Section 3.4), and an interview of the Property owner (see Section 5.1) indicated that a log pond was formerly located on the Property. Woodwaste was identified in the former log yard (see Section 4.4). Tannins, phenols, resins, and fatty acids may have leached out of timber stored in the log pond and/or log yard and accumulated in the underlying soil and/or groundwater. Groundwater and/or surface water runoff impacted by woodwaste may have elevated chemical and/or biological oxygen demands and total suspended solids. While these water quality conditions are not associated with hazardous substances regulated under MTCA, if discharged to a surface water body, they may impact water quality conditions. Therefore, potential impacts to water quality resulting from remaining untreated wood debris, or residues of untreated wood, in the former log pond and log yard areas are considered a de minimis condition.

Wood debris in former log yard. The Phase II ESA estimated that 300,000 to 350,000 cubic yards of wood debris may be present on the former log yard located both on- and off-Property. While the wood debris itself is not considered a source of hazardous substances, it does present a potential geotechnical concern for future development and typically requires management as a solid waste (e.g., capping to prevent infiltration, groundwater monitoring).

Miscellaneous petroleum storage and use. According to the SWPPP, petroleum products, including waste oil, gear oil, hydraulic oil, motor oil, diesel fuel, gasoline, and mineral spirits were used and stored above ground in multiple locations across the former lumber mill facility (see Section 4.4). Hydraulic units and equipment were also stored and used across the Property. Spills may have occurred during loading and/or unloading of liquid materials and/or operation and maintenance of equipment. The SWPPP indicated that a spill prevention, control, and countermeasures plan (SPCC) was required; no SPCC was provided for the Property.

Parts washing; vehicle and equipment maintenance, washing, and steam cleaning. The SWPPP indicated that these activities were being conducted at the Property (see Section 4.4). There is the potential for releases to have occurred if these operations were not managed in accordance with the SWPPP. However, the records review identified no spills or releases associated with these activities (see Section 4).

Unidentified buried waste and hazardous waste dumping. Multiple allegations were made that waste drums had been buried on the Property (see Section 4.4). Limited investigation was conducted to address this concern, but only 0.8 acres out of approximately 42 acres of Property were evaluated. Also, public access to the Property is unrestricted and evidence of illegal dumping was encountered during the site reconnaissance visit (see Section 2.2). While the presence of these wastes has not been confirmed, the potential exists for unauthorized waste and/or buried waste to be encountered on the Property.

Chemical byproducts associated with burned material on the Property. Burned wood and other materials with associated carcinogenic and toxic chemicals may be present in small quantities on the Property as a result of previous fires. Given that it is unlikely that large quantities of burned materials are present on the Property, it is considered a de minimis condition.

7.5 Data Gaps

Complete documentation was not provided for soil investigations conducted on the Property in 2005, by GeoEngineers, and in 2007 by Environmental Health Management (see Section 4.4). Therefore, MFA could not adequately review the sampling results.

No documentation or records were provided that indicated whether the USTs located at 1400 and/or 1404 Third Street were closed-in-place or removed; the number of USTs present; or the UST contents, years of usage, or capacities.

A GeoTest Services, Inc. report, dated July 9, 2007, indicates the presence of petroleum hydrocarbon and metals constituents in soil in the northwest corner of the Property. The report concludes that concentrations do not exceed regulatory cleanup criteria, but does not provide adequate documentation to review the results.

7.6 Recommendations

MFA recommends that, if the Client intends to develop the Property, they consider whether the wetland assessment previously conducted at the Property has sufficiently evaluated wetland conditions in the areas proposed for development.

MFA recommends additional soil and groundwater investigation on the Property to evaluate the RECs identified in Section 7.1.

7.7 Activity Use Limitations Compliance

Activity use limitations related to hazardous substances and petroleum products were not observed in the documentation reviewed by MFA or noted by the Client.

7.8 Statement of Environmental Professionals Conducting Phase I Environmental Site Assessment

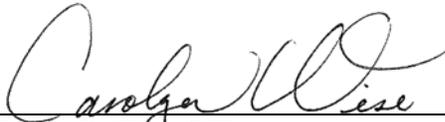
FORMER SEDRO-WOOLLEY LUMBER MILL
109 JAMESON STREET, SEDRO-WOOLLEY, WASHINGTON

The material and data in this report were prepared under the supervision and direction of the undersigned.

MAUL FOSTER & ALONGI, INC.



Heather R. Good, LHG
Project Hydrogeologist



Carolyn R. Wise, GIT
Staff Geologist

We declare that, to the best of our professional knowledge and belief, we meet the definition of environmental professional as defined in §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 appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

8 CONCLUSIONS

MFA has conducted a Phase I ESA, in conformance with the scope and limitations of ASTM Practice E1527-13, of 109 Jameson Street, Sedro-Woolley, Washington, the Property. Any exceptions to, or deviations from, this practice are described in Section 1 of this report.

The Phase I ESA revealed evidence of RECs in connection with the Property:

- Potential petroleum impacts in groundwater from USTs on the neighboring Sedro-Woolley City Sanitation property
- Potential hazardous-waste-containing wood debris in the former log yard
- Potential PCB release(s) to shallow soil in former mill operational areas
- Groundwater impacts associated with LUSTs in the former fabrication shop area
- Buried and capped former treatment cell soil
- PCS associated with former maintenance shop
- PCS associated with former debarker loader stockpile
- PCS associated with former shake mill
- Petroleum-impacted groundwater from former fueling station, helipad, and heavy equipment boneyard areas on the neighboring property
- Lead and asbestos in building demolition debris and underlying soil

9 LIMITATIONS

The services undertaken in completing this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These

services were performed consistent with our agreement with our Client. This report is solely for the use and information of our Client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the Client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.

The purpose of an environmental assessment is to reasonably evaluate the potential for or actual impact of past practices on a given site area. In performing an environmental assessment, it is understood that a balance must be struck between a reasonable inquiry into the environmental issues and an exhaustive analysis of each conceivable issue of potential concern. The following paragraphs discuss the assumptions and parameters under which such an opinion is rendered.

No investigation is thorough enough to exclude the presence of hazardous materials at a given site. If hazardous conditions have not been identified during the assessment, such a finding should not, therefore, be construed as a guarantee of the absence of such materials on the site, but rather as the result of the services performed within the scope, limitations, and cost of the work performed.

Environmental conditions that cannot be identified by visual observation may exist at the site. Where subsurface work was performed, our professional opinions are based in part on interpretation of data from discrete sampling locations that may not represent actual conditions at unsampled locations.

Except where there is express concern of our Client, or where specific environmental contaminants have been previously reported by others, naturally occurring toxic substances, potential environmental contaminants inside buildings, or contaminant concentrations that are not of current environmental concern may not be reflected in this document.

REFERENCES

- BEK. 1998. Environmental site assessment preliminary phase II, Latting property, Sedro-Woolley, Washington. BEK Purnell Engineering, Inc. Bellingham, Washington. May 25.
- BEK. 2003. Environmental site assessment phase I, 1617 3rd Street, Sedro-Woolley, Washington. BEK Engineering & Environmental, Inc. Ferndale, Washington. April.
- Cohn, O.R. 1988a. Letter (re: underground storage tanks at 1400-3rd St., Sedro-Woolley, WA) from O.R. Cohn to T. Oakes. Sedro-Woolley, WA. November 9.
- Cohn, O.R. 1988b. Letter (re: underground storage tanks at 1400-3rd St., Sedro-Woolley, WA) from O.R. Cohn to T. Oakes. Sedro-Woolley, WA. November 22.
- Cohn, O.R. 1990. Letter (re: proposal for filling tanks at 1400-3rd St.) from O.R. Cohn to Building Department, City of Sedro-Woolley. Sedro-Woolley, Washington. January 25.
- County. 2017. Skagit County iMap (<https://www.skagitcounty.net/Maps/iMap/>) (accessed October 27, 2017).
- Ecology. 2004. Letter (re: Independent remedial action – interim cleanup at parcel no. P111170, Sedro-Woolley Lumber Co., 109 Jameson Avenue, Sedro-Woolley, WA 98284) from R. Timm, Washington State Department of Ecology, to A. Mick, TreeSource Industries, Inc. Bellevue, Washington. July 26.
- Environmental Health Management. 2006. Residual health risk assessment, Sedro Woolley Mill—former fabrication shop. Prepared for TreeSource Industries, Inc., Lake Oswego, Oregon. September 18.
- Federal Interagency Committee for Wetland Determination. 1989. Federal manual for identifying and delineating jurisdictional wetlands. U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency, U.S. Department of the Army, U.S. Soil Conservation Service.
- GeoTest. 2007. Letter (re: Potential environmental conditions, proposed new Deluxe Recycling and Disposal facility, Jameson Avenue, Sedro-Woolley, Washington) to D. Wilton, Deluxe Recycling and Disposal, from D. Sorenson, GeoTest services, Inc. Bellingham, Washington. July 9.
- IT Corporation. 2000. Letter (re: results of groundwater monitoring activities at the Sedro-Woolley Lumber Company facility, Sedro-Woolley, Washington) from J. Lower, PE, and M. Havighorst, EIT, IT Corporation, to G. Patrick, TreeSource Industries, Inc. November 13.
- Oakes, T. 1988a. Letter (re: underground storage tanks at 1400-3rd St., Sedro-Woolley, WA) from T. Oakes, City of Sedro-Woolley, Washington, to O.R. Cohn. November 10.
- Oakes, T. 1988b. Letter (re: underground storage tanks at 1400-3rd St., Sedro-Woolley, WA) from T. Oakes, City of Sedro-Woolley, Washington, to O.R. Cohn. December 2.

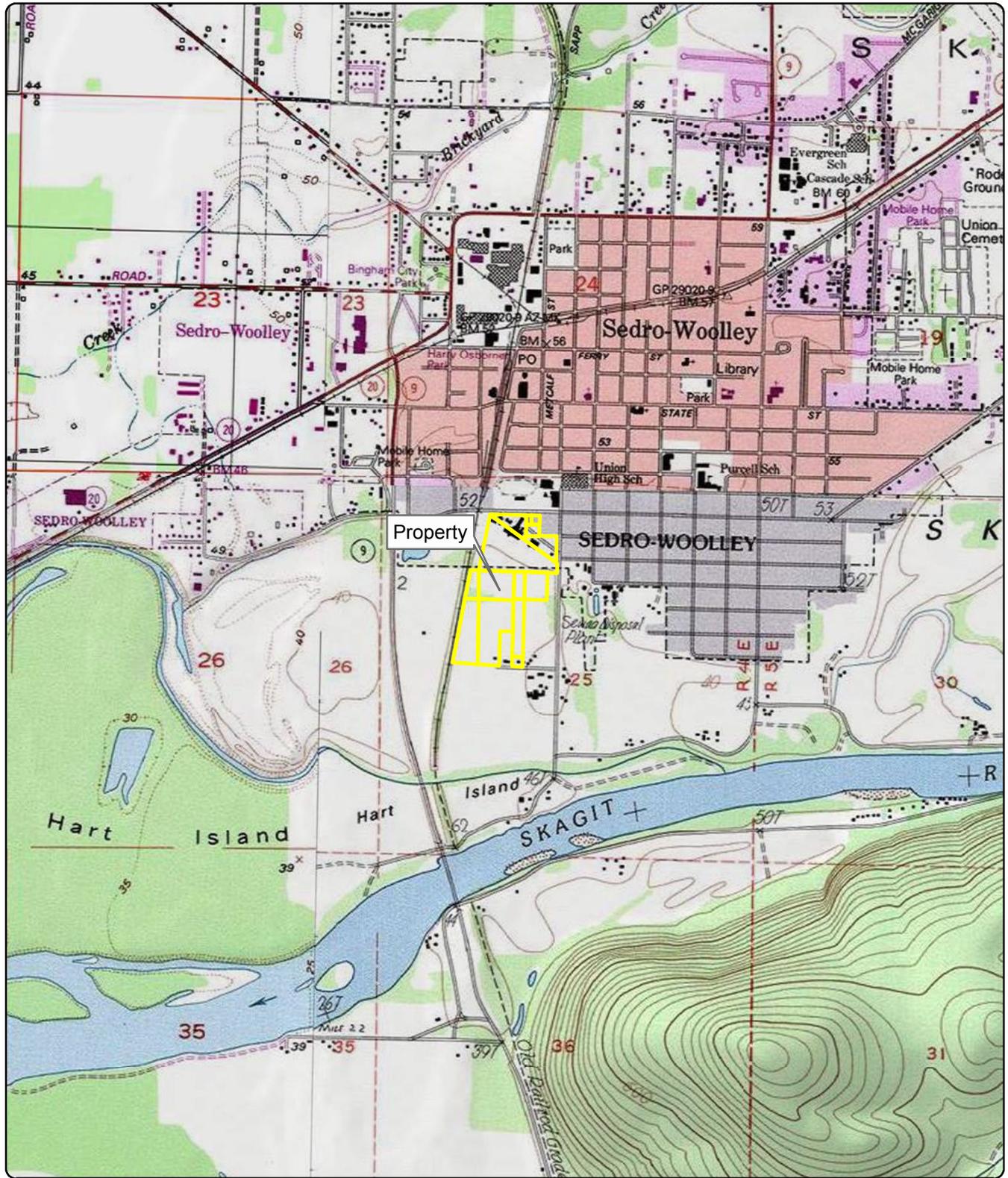
WADNR. 2017. Geologic information portal (<https://www.dnr.wa.gov/geologyportal>) (accessed October 15, 2017).

Whitman. 2000. Limited environmental review, apartment property, 1404 Third Street, Sedro-Woolley, Washington. Whitman Environmental Sciences. Seattle, Washington. November 27.

Widener. 2016. Letter (re: Jameson arterial extension to SR 9, petroleum contaminated soils) from Ross Widener, Widener & Associates. Everett, Washington. July 18.

FIGURES





Source: US Geological Survey (1990) 7.5-minute topographic quadrangle: Sedro-Woolley South Section 25, Township 35 North, Range 4 East. Parcels obtained from Skagit County GIS.

Legend

 Property Parcel

Figure 1
Property Location

Former Sedro-Woolley Lumber Mill
Sedro-Woolley, Washington



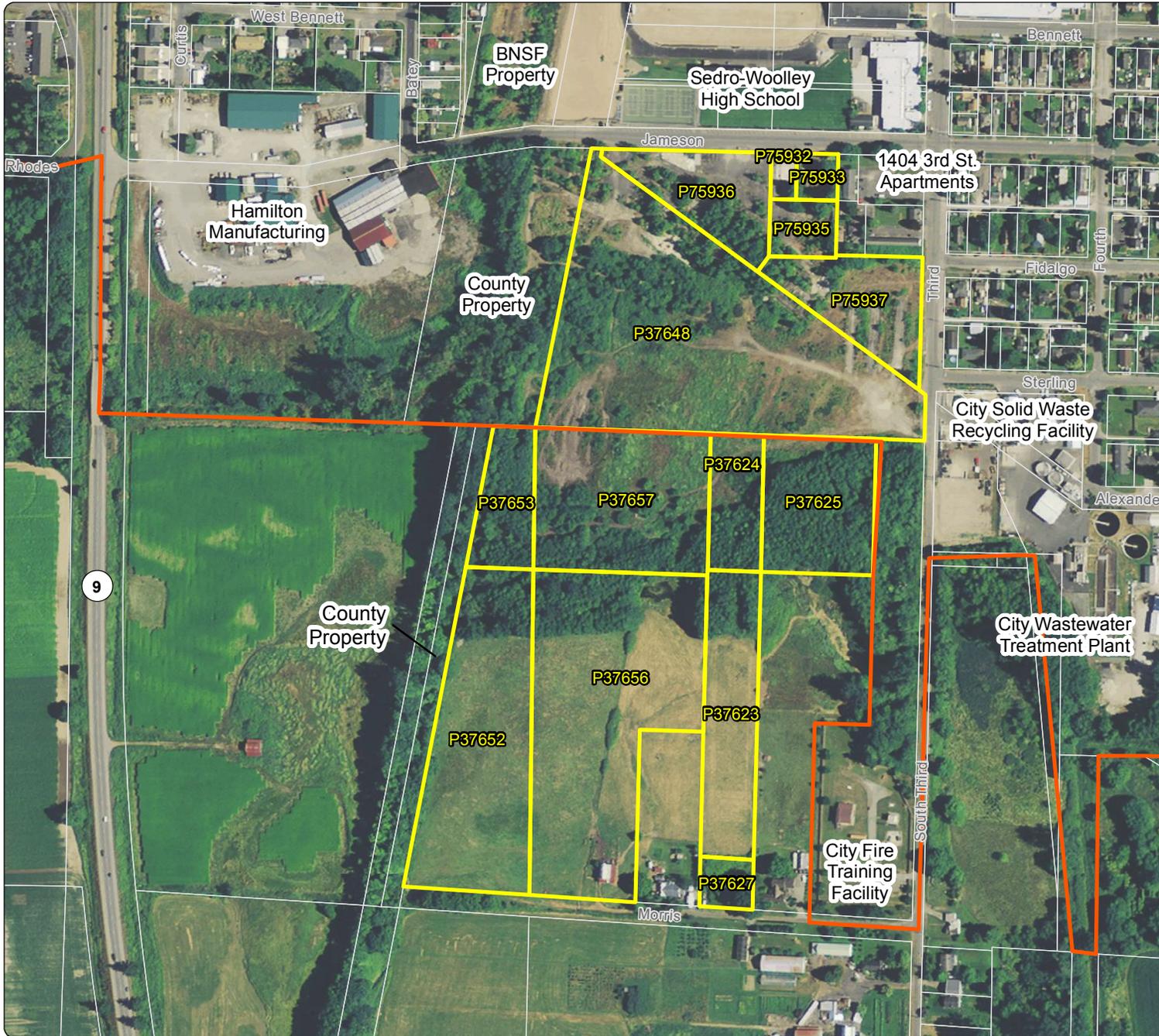


Figure 2
Property Vicinity
 Former Sedro-Woolley Lumber Mill
 Sedro-Woolley, Washington

Legend

- Property Parcel with Parcel No.
- Sedro-Woolley City Boundary
- Skagit County Parcel

Notes:
 BNSF = Burlington Northern
 Santa Fe Railway Company.
 City = City of Sedro-Woolley.
 County = Skagit County.



Source: Aerial photograph obtained from 2017
 Esri, ArcGIS Online. Parcel and road data
 obtained from Skagit County GIS.

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Figure 3
Property Features
 Former Sedro-Woolley Lumber Mill
 Sedro-Woolley, Washington

- Legend**
- Property Feature
 - Property Parcel
 - Sedro-Woolley City Boundary
 - Skagit County Parcel

Notes:
 Features may not be shown to scale
 and locations are approximate.



Source: Aerial photograph obtained from 2017
 Esri, ArcGIS Online. Parcel and road data
 obtained from Skagit County GIS.