Phase I Environmental Site Assessment
Federal Reserve Bank of San Francisco - Seattle Branch Building
1015 Second Avenue
Seattle, Washington

Prepared for

U.S. General Services Administration
Real Property Utilization & Disposal Division
450 Golden Gate Avenue, 4th Floor East
San Francisco, California 94115

AMEC Project No. GSA1570010

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TABLE OF CONTENTS

Page

EXECUTIVE SUMMARY ES-1

1.0 INTRODUCTION 1-1
- 1.1 PURPOSE AND SCOPE OF WORK 1-1
- 1.2 SPECIAL TERMS AND CONDITIONS 1-2
- 1.3 USER RESPONSIBILITY 1-2

2.0 SITE DESCRIPTION 2-1
- 2.1 LOCATION 2-1
- 2.2 PHYSICAL SETTING 2-1
  - 2.2.1 Topography 2-1
  - 2.2.2 Surface Water and Hydrogeology 2-1
  - 2.2.3 Regional Geology 2-1
  - 2.2.4 Oil and Gas Wells 2-1
- 2.3 SITE AND VICINITY GENERAL CHARACTERISTICS 2-2
- 2.4 ENVIRONMENTAL LIENS 2-2
- 2.5 CURRENT USE OF THE SITE 2-2

3.0 SITE HISTORICAL REVIEW 3-1
- 3.1 PAST USES OF THE SITE 3-1
  - 3.1.1 Aerial Photographs 3-2
  - 3.1.2 Topographic Maps 3-2
  - 3.1.3 City Directory 3-3
- 3.2 INTERVIEWS 3-3
- 3.3 PREVIOUS ENVIRONMENTAL STUDIES INVOLVING THE SITE 3-3

4.0 SITE AND AREA RECONNAISSANCE 4-1
- 4.1 GENERAL OBSERVATIONS 4-1
  - 4.1.1 Aboveground and Underground Storage Tanks, Drums, and Containers 4-2
  - 4.1.2 Hydraulic Equipment 4-2
  - 4.1.3 Heavy Machinery 4-2
  - 4.1.4 Petroleum Products. Hazardous Materials, Vents and Piping 4-2
  - 4.1.5 Utilities 4-3
  - 4.1.6 Asbestos-Containing Building Materials 4-3
  - 4.1.7 Leaded Coatings 4-3
  - 4.1.8 Polychlorinated Biphenyls (PCBs) and Mercury 4-4
  - 4.1.9 Other Possible Areas of Concern 4-4
  - 4.1.10 Adjacent Properties 4-4

5.0 REGULATORY AGENCY DATABASE REPORT REVIEW 5-1
- 5.1 THE SITE 5-1
- 5.2 OFFSITE PROPERTIES 5-1
- 5.3 REGULATORY FILE REVIEW 5-8
- 5.4 DATA GAPS 5-8

6.0 CONCLUSIONS AND RECOMMENDATIONS 6-1

7.0 ENVIRONMENTAL PROFESSIONAL STATEMENT 7-1

8.0 REFERENCES 8-1

EXECUTIVE SUMMARY

At the request of U.S. General Services Administration (GSA), AMEC Environment & Infrastructure, Inc. (AMEC) performed a Phase I Environmental Site Assessment (ESA) of the former Federal Reserve Bank (FRB) of San Francisco - Seattle Branch Building (hereafter referred to as "Site") located at 1015 Second Avenue in Seattle, Washington. AMEC performed this work pursuant to our proposal dated May 17, 2012.

The purpose of the Phase I ESA was to identify recognized environmental conditions (RECs) at the Site using guidance provided in the American Society for Testing and Materials (ASTM) Standard E 1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment*. The scope of work for the Phase I ESA included conducting a Site visit and area reconnaissance; obtaining and reviewing an environmental regulatory agency database report, topographic maps, aerial photographs; evaluating the data; and preparing this report.

AMEC's Phase I ESA identified the following information, based on information made available:

- The Site is located on the on the southwest side of Second Avenue between Spring and Madison Streets in the financial district of Seattle, Washington. Based on available information, the Site was occupied by dwellings and a church between the early 1880s and early 1890s and by the Rialto building, which is occupied by a furniture and carpet company, in 1905. Between 1905 and 1950, available historic documentation does not identify the business use of building; however, based on the fact that the Rialto building was demolished in order to build the FRB, it is likely that business uses during this time was similar to those operating in 1905. FRB began use of the building in 1950 and occupied the building until they discontinued operations in 2008. The building has been maintained, but vacant since that time.
- The approximately 0.60 acre Site includes one seven story building including a sub basement with limited parking, basement with limited parking, four office floors, a mezzanine level, and roof top access. The areas along the east, north and south sidewalks are landscaped.
- One aboveground storage tank (AST) is present onsite. The AST contains diesel and is utilized for the backup generator for the building. The total volume of the AST is 2,500 gallons; however, was never filled beyond 2,000 gallons as a safety measure.
- A former diesel underground storage tank (UST) is located in the sub basement along the southwest part of the building in the former incinerator room. Samples were collected around the UST, the contents removed, and the diesel UST was filled with pebbles and closed in place in 1999 and has not been used since.
- A gasoline UST was historically present adjacent to the building. The UST removal and cleanup was reportedly conducted and extended into the adjoining street and case closure was granted.
- During the Site reconnaissance containers of Round-Up-herbicide, bleach, and paint were observed as well as some non-hazardous rubbish in the basement.
- Asbestos containing materials (ACM) and lead coated materials are present at the Site. Multiple episodes of asbestos abatement occurred in the building between 1986 and 1995 and the FRB reportedly removed "red lead" from structural steel on the floors where they gutted and structurally upgraded.

1.0 INTRODUCTION

At the request of U.S. General Services Administration (GSA), AMEC Environment & Infrastructure, Inc. (AMEC) performed a Phase I Environmental Site Assessment (ESA) of the of the Federal Reserve Bank (FRB) of San Francisco - Seattle Branch Building (hereafter referred to as "Site") located at 1015 Second Avenue in Seattle, Washington. This ESA was conducted in general conformance with the scope and limitations set forth in the American Society for Testing and Materials (ASTM) Standard Practice E 1527-05 and pursuant to our proposal dated May 17, 2012.

1.1 PURPOSE AND SCOPE OF WORK

The purpose of the Phase I ESA is to identify recognized environmental conditions at the Site, as defined by the ASTM Standard E 1527-05, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.* The work was also designed to permit the user to satisfy one of the requirements to qualify for the innocent landowner defense to Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) liability, as well as to evaluate the potential for general environmental liability associated with the Site.

> "The term recognized environmental conditions (RECs) means 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. The term includes hazardous substances or petroleum products even under conditions in compliance with applicable laws and regulations. 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. Conditions determined to be de minimis are not recognized environmental conditions."

The scope of work for the Phase I ESA included the following activities:

- Completing a Site visit on June 5, 2012; Site photographs are presented in Appendix A.
- Reviewing historical aerial photographs of the Site and its vicinity. Aerial photographs are presented in Appendix B.
- Reviewing United States Geologic Survey (USGS) 7.5-minute topographic maps to assess the physical setting of the Site and surrounding area (Appendix B).
- Obtaining and reviewing an environmental regulatory agency database report from Environmental Data Resources ([EDR], Appendix C).
- Obtaining an environmental lien report from EDR (Appendix B).
- Reviewing the "User Questionnaire" from GSA (Appendix B).
- Evaluating and correlating the data from the above activities.
- Preparing this report.

Our proposed scope of services for this Phase I did not include chain of title review, sampling or evaluating buildings for radon or asbestos-containing materials, evaluating ambient air quality,

2.0 SITE DESCRIPTION

The following sections provide a description of the Site features and physical setting of the Site.

2.1 LOCATION

The Site address is 1015 Second Avenue, on the southwest side of Second Avenue between Spring and Madison Streets in Seattle, Washington. The Site is in the western portion of the city of Seattle just east of Elliott Bay/Puget Sound in an area of mixed commercial and high density residential land uses. The Site occupies approximately 0.60 acre. Figure 2-1 is a site location map, and Figure 2-2 shows the configuration of the Site.

2.2 PHYSICAL SETTING

The physical setting of the Site is described below.

2.2.1 Topography

The Site is at an approximate elevation ranging between 60 and 80 feet mean sea level (MSL) according to USGS Seattle South 7.5-minute quadrangle map (USGS, 1987). The area in the vicinity is steeply sloping towards the west-southwest.

2.2.2 Surface Water and Hydrogeology

Surface drainage on the Site is controlled by curbs, gutters, drain inlets, and is discharged to the City of Seattle drainage system. The Site and surrounding area are developed with buildings or pavement. The closest surface water feature is Elliott Bay/Puget Sound, located approximately 950 feet west-southwest of the Site.

Groundwater flow is typically influenced by such factors as geologic material, faulting, stratigraphic folds or non-conformities, or local ponds, reservoirs and rivers, as well as, ground water extraction wells, type and extent of buried fill materials, topography, presence of nearby surface water bodies, presence of nearby water supply wells, and the influence of underground utilities. Given that the Site area has been extensively developed and the potential that the several underground utilities may be present, variations from the anticipated groundwater flow direction may occur. Based on local topography and review of local hydrogeology references depth to ground water in the vicinity of the Site is expected to be between 10 and 20 feet below ground surface (bgs) and groundwater flow is to the west-southwest towards Puget Sound.

2.2.3 Regional Geology

The Seattle area is in the Puget Sound Basin geomorphic province. The Seattle area is dominated by a series of north-trending elongated ridges and drift uplands. The uplands are separated by large Pleistocene glacial troughs that are now occupied by tidal waters, large lakes, or have been alleviated by streams that inherited the troughs with the retreat of the most recent glaciation. The Seattle Central Business District (CBD) that includes the project area is underlain by glacial drift and nonglacial Pleistocene deposits.

2.2.4 Oil and Gas Wells

Oil and gas wells are potential concerns when they seep oil or gas, are not abandoned to current regulations, or have associated surface contamination. They may also be associated with methane hazards. The Site is not within an identified oil field and the presence of unreported "wildcat" oil wells on or near the Site is considered unlikely.

3.0 SITE HISTORICAL REVIEW

AMEC reviewed historical uses of the Site and adjacent properties to assess whether prior occupants may have conducted activities that could be of environmental concern to the Site. This review included available historical Sanborn Fire Insurance Maps, aerial photographs, and topographic maps.

Based on available information, the Site was occupied by dwellings and a church between the early 1880s and early 1890s. In 1905, the Site is occupied by the Rialto building, which housed a Furniture and Carpets company. It is unknown how long this use continued; however, based on the fact that the Rialto building was demolished in order to build the FRB, it is likely that business uses between 1905 and 1949 (when the Site is vacant) was similar to those operating in 1905. In 1950, the Site is occupied by the FRB and this use continued until its closure in 2008. The building has been maintained, but vacant since that time.

3.1 PAST USES OF THE SITE

AMEC identified past use at the Site based on reviewing aerial photographs, and topographic maps.

3.1.1 Sanborn Maps

AMEC reviewed seven historical Sanborn Fire Insurance Maps dated between 1884 and 1969 provided by EDR. These maps are presented in Appendix B.

- **1884:** The Site is occupied by "dwellings" and a Protestant Church along Second Street and by sheds and a "Marble Works" along the west side of the Site. A small Foundry and drug store border the Site to the west while dwellings surround the remainder of the properties across Second Avenue and Madison and Spring Streets. The surrounding area is characterized primarily by residential "dwellings", businesses (one which contains paints and oils), restaurants, and churches.
- **1888:** The Site appears unchanged. West J Street and a smaller rectangular building bound the south side of the property. The Foundry to the west of the Site is no longer present and the building is indicated as "dilapidated" and the drug store present on the previous map now contains a cigar factory. The properties across Second Avenue and Madison and Spring Streets continue to be predominantly residential; however a "Pavilion" is now present just north of the Site across Spring Street. The surrounding area continues to be characterized primarily by residential though and businesses though further west of the Site there is a large spring bed manufacturing company that maintains above ground tanks.
- **1893**: The Site is now occupied by a large building with similar configuration to the existing structure. The map does not indicate the building use. The property immediately to the west is now occupied by a large building; however with the exception of a "printing area" in the southeast corner of the building, its use is also unknown. North of the Site across Spring Street is now occupied by a Livery and feed sale while south of the Site is now depicted as vacant. East of the Site across Second Avenue is now indicated as being built.
- **1905**: The Site is now occupied by the Rialto Building which contains Frederick and Nelson Furniture and Carpets. A large water tank is depicted in the western portion of the Site. Immediately west of the Site is now the Standard Furniture Company. A carpeting and sewing area and offices and lodgings also make up the business.

3.1.4 City Directory

AMEC reviewed a City Directory Abstract provided by EDR that covered between 1920 and 2005. The Site address was not listed in the directory until 1970. In 1970, the listed tenant is FRB of San Francisco as well as "Federal Deposit Ins. Corp" and "Federal Reserve Bank". The directory also indicated several other name iterations to FRB on the 1st floor. The FRB of San Francisco and name iterations to FRB are listed at the Site address through 2005.

Surrounding property addresses are listed beginning in 1920 and include, decorating, printing, packing, shipping and canning companies as well as a mix of retail businesses, restaurants, and residences. In the 1930s and 1940s, the majority of the listings in the area are identified as "professional" such as insurance and banking, retail, restaurants and residential. Only a few manufacturing companies (fabrics, bed company, furniture) are listed in the area. The business mix of the surrounding area through the 1950s and 1960s remains relatively unchanged with a larger percentage of businesses being professional and retail. In the 1970s the business mix is predominantly commercial (devoted to banking) and retail, with greater percentage of apartments/condominiums. With the exception of additional residential units, the business mix remains relatively unchanged through 2005.

3.2 INTERVIEWS

Interviews with Ms. Maureen Sheehan and Mr. Michael Levine of General Services Administration, and Mr. Carpenter of the Federal Reserve Bank were conducted by AMEC during the Site reconnaissance. With the exception of previously completed lead and asbestos abatement activities, a reported gasoline release, a lead dust evaluation, and asbestos surveys, the GSA and FRB were not aware of any environmental issues or studies directly associated with the past operations of the Site.

According to Mr. Carpenter, there was reportedly a gasoline underground storage tank (UST) adjacent to the building that was discovered to have had a past release during the removal action. The UST removal and cleanup was reportedly conducted and extended into the adjoining street and case closure was granted. A diesel UST for the building was also closed in place. Reportedly, no contamination was discovered at closure and its presence under the building makes it impractical if not impossible to remove.

3.3 PREVIOUS ENVIRONMENTAL STUDIES INVOLVING THE SITE

As discussed above, with the exception of previously completed abatement activities, a reported gasoline release, a lead dust evaluation, and asbestos surveys, no known previous environmental studies have been conducted at the Site. With exception of a 1993 asbestos survey (discussed below), information was not readily available for the other studies.

In 1993, Carl Mangold performed "*A Survey and Assessment of Asbestos and Hazardous Materials and Risk Assessment*" of behalf of the FRB (Mangold, 1993). As part of the survey, only approximately 30 samples were collected. Results of the survey identified the presence of asbestos in sprayed on fireproofing, floor tile and mastic, roofing materials, piping installation, fire doors, air handling units, and heating units. According to the report multiple episodes of abatement occurred in the building between 1986 and 1993; however the report indicated substantial amounts and type of asbestos remained in the building.

4.1.1 Aboveground and Underground Storage Tanks, Drums, and Containers

One aboveground storage tank (AST) was observed during the Site reconnaissance. The AST contains diesel and is utilized for the backup generator for the building. The total volume of the AST is 2,500 gallon; however, according to Mr. Carpenter the AST was never filled beyond 2,000 gallons as a safety measure. AMEC observed a fire department permit for the AST. According to Mr. Carpenter, a closed in place former diesel UST is located in the sub basement along the southwest part of the building in the former incinerator room. Samples were collected around the UST, the contents removed, and the diesel UST was filled with pebbles, closed in place in 1999, and has not been used since, according to Mr. Carpenter.

In addition to the diesel UST, as detailed above in section 3.2, a gasoline UST was historically present adjacent to the building. The UST removal and cleanup was reportedly conducted and extended into the adjoining street and case closure was granted.

Mr. Carpenter informed AMEC that the Round-up herbicide is used on the rooftop to control vegetation.

The following containers were observed during the Site reconnaissance:

Material	Location	Comments
Diesel	Sub basement floor middle of building slightly on east side-Diesel AST bermed room	2,500 gallon diesel AST, the meter on the AST showed approximately 1,300 gallons of diesel in the AST
Round-Up-herbicide	Sub Basement southwest corner of the building	64 oz container
Bleach	Sub Basement southwest corner of the building	2-64 oz containers
Paint	Sub Basement southwest corner of the building	Numerous spray cans, 1 pint, 1 gallon, and 5 gallon buckets with a total volume of approximately 100 gallons
Non-hazardous rubbish	Basement near and in dumpster	Roll-off bin; disposal contracted to Cleanscape

No leaks or staining associated with these materials was observed.

4.1.2 Hydraulic Equipment

No hydraulic equipment or machinery was observed onsite.

4.1.3 Heavy Machinery

No heavy equipment or machinery was observed onsite. Mr. Carpenter did inform AMEC that in the past, forklifts were used at the Site. AMEC did observe some minor staining in the former coin room where the forklifts were used.

4.1.4 Petroleum Products. Hazardous Materials, Vents and Piping

The following petroleum products were observed at the Site:

Material	Location	Comments
Diesel	AST	Meter reads approximately 1,300 gallons of diesel in the AST

In addition, there was an indoor firing range that operated at the Site and this area is suspected of being impacted by lead as well as the associated exhaust that leads into the main building exhaust and exits via the 4th floor and had no HEPA filtration. Currency shredding was also performed at the building and generated dust which was collected in a baghouse inside the garage adjacent to the firing range; this dust is suspected of containing lead.

4.1.8 Polychlorinated Biphenyls (PCBs) and Mercury

One transformer was observed on the Site during the reconnaissance. Seattle City Light was contacted and confirmed that the transformer is non-PCB containing. Due to the pre-1978 construction of the building, electrical equipment and materials such as fluorescent light ballasts, switches, and window putty have the potential to contain PCBs. The fluorescent light tubes/lamps and HID lamps may contain mercury vapor.

4.1.9 Other Possible Areas of Concern

Other than as described in the previous sections, during the Site visit AMEC did not observe evidence of the following:

- Remnants of former buildings
- Chemical or petroleum smells or foul/unusual odors
- Landfill or burial activities
- Pits, ponds, lagoons, or seeps
- Stained soil, corrosion, stressed vegetation, or soil stockpiles
- Water wells or septic tank/leach field systems
- Chemical spills or releases
- Discharges, leachate, migration, or run-on of potential contaminants from offsite sources

4.1.10 Adjacent Properties

AMEC conducted a visual reconnaissance of the properties adjoining the Site by observing the adjacent properties from public rights-of-way. No apparent evidence of potential RECs was observed on road rights-of-way or on the parcels immediately adjacent to the Site.

- **North**: The Site is bordered to the north by Spring Street and commercial property.
- **East**: The Site is bordered to the east by Second Avenue and commercial property.
- **South**: The Site is bordered to the south by Marion Street and commercial property.
- **West**: The Site is bordered to the west by an alley and commercial property.

phase for possible inclusion on the NPL. Source: EPA/National Technical Information Service (NTIS). Source: EPA.

There are no listed CERCLIS properties within 0.5 mile of the Site.

- **CERCLIS-No Further Remedial Action Planned (NFRAP; 0.5 mile), December 28, 2011.** No NFRAP properties are those removed from CERCLIS because, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the property to be placed on the NPL, or the contamination was not serious enough to require federal Superfund action or NPL consideration. The purpose of the NFRAP is to remove unintended barriers to the redevelopment of the properties as part of EPA's Brownfields program to promote economic development of unproductive urban properties. Source: EPA.

  There is no listed CERCLIS-NFRAP site within 1/2 mile of the Site.

- **National Priorities List (1.0 mile), May 8, 2012.** The NPL is a subset of CERCLIS and identifies over 1,200 properties for priority cleanup under the Superfund program. A NPL (i.e., Superfund) Site must meet or surpass a predetermined hazard ranking system score, be chosen as a state's top priority Site, or meet three specific criteria set jointly by the U.S. Department of Health and Human Services and the EPA. Source: EPA.

  There are no NPL sites within one mile of the Site.

- **Resource Conservation and Recovery Act (RCRA) Info, March 15, 2012.** RCRA Info includes selected information on facilities that generate, transport, store, treat and/or dispose of hazardous waste, as defined by the RCRA. Source: EPA/NTIS. RCRA Info includes the following databases:

  - **RCRA Treatment, Storage, and Disposal (TSD) Facilities (0.5 mile).** Facilities that treat, store, and/or dispose of hazardous wastes.

    There are no listed treatment, storage, and/or disposal facilities within 0.5 mile of the Site.

  - **RCRA Generators Lists (0.25 mile).** RCRA large quantity generators (LQG) are those facilities that generate at least 1,000 kilograms per month (kg/month) of nonacutely hazardous waste or meet other applicable RCRA requirements. RCRIS small quantity generators (SQG) generate less than 1,000 kg/month of nonacutely hazardous waste or meet other applicable RCRA requirements. RCRA conditionally exempt small quantity generators (CESQG) generate less than 100 kilogram (kg) of hazardous waste or less than 1 kg or acutely hazardous waste per month.

    Many RCRIS generators also appear on either or both of two non ASTM lists; Facility Index System (FINDS) and Hazardous Waste Information System (HAZNET). The EPA's FINDS provides facility information and "pointers" to other databases (e.g., Permit Compliance System, Aerometric Information Retrieval System, and Federal Facilities Information System).

    There are no listed RCRA LQG properties within 1/4 mile of the Site.

    There are no listed RCRA SQG properties within 0.25 mile of the Site.

http://www.ecy.wa.gov/programs/tcp/cscs indicates that cleanup activities were initiated in 2009. Based on the regulatory status and this property's downgradient location, it is considered to have a low potential to impact the Site.

4. Kennedy Hotel is approximately 1,150 feet northeast and upgradient of the Site. Soils and groundwater impacted by petroleum hydrocarbons have been confirmed above regulatory levels at this property. Review of the DEC website http://www.ecy.wa.gov/programs/tcp/cscs indicates that cleanup activities were initiated in 2009; however, information on the status of the investigation or cleanup was not available. Based on this property's upgradient and nearby location, it is considered to have a moderate potential to impact the Site.

5. Seattle Steam Co. (Post Avenue) is approximately 1,150 feet south and crossgradient of the Site. Soils and groundwater impacted by petroleum hydrocarbons, metals, PCBs and polynuclear aromatic hydrocarbons (PAHs) have been confirmed above regulatory levels at this property. Review of the DEC website http://www.ecy.wa.gov/programs/tcp/cscs indicates that the property is pending cleanup. Based on this property's crossgradient location, it is considered to have a low potential to impact the Site.

6. Seattle Steam Co. (Western Avenue) is approximately 1,150 feet west-northwest and downgradient of the Site. Soils and groundwater impacted by petroleum hydrocarbons, metals, PCBs and PAHs have been confirmed above regulatory levels at this property. Review of the DEC website http://www.ecy.wa.gov/programs/tcp/cscs indicates that the property is pending cleanup. Based on this property's downgradient location, it is considered to have a low potential to impact the Site.

7. Central Seattle Waterfront is approximately 1,200 feet west-northwest and downgradient of the Site. Sediments impacted by petroleum hydrocarbons, metals, PCBs and halogenated organics have been confirmed above regulatory levels at this property. Review of the DEC website http://www.ecy.wa.gov/programs/tcp/cscs indicates that the property is pending cleanup. Based on this property's downgradient location, it is considered to have a low potential to impact the Site.

8. Seattle Port Terminal 48 is approximately 1,300 feet south- southwest and downgradient of the Site. Sediments impacted by metals, have been confirmed above regulatory levels at this property. Review of the DEC website http://www.ecy.wa.gov/programs/tcp/cscs indicates that the property is pending cleanup. Based on this property's downgradient location, it is considered to have a low potential to impact the Site.

Twelve properties are between 1/4 and 1/2 miles from the Site. These properties are all "Reported Cleaned Up", down or cross gradient, or sufficiently upgradient from the Site and are, therefore, considered to have a low potential to impact the Site due to their distance from the Site.

The remaining 77 properties are between 1/2 and 1.0 mile from the Site. Due to these properties regulatory status "Reported Cleaned Up" or distance and direction, they are considered to have a low potential to impact the Site.

Site based on this its upgradient and nearby location. The second property, Q-West Corporation is located approximately 600 feet north and cross to upgradient of the Site. Review of the DEC website http://www.ecy.wa.gov/programs/tcp/cscs indicates that cleanup activities (for gasoline) were initiated in 2005; however, information on the status of the investigation or cleanup was not available. Based on this property's upgradient and nearby location, it is considered to have a moderate potential to impact the Site.

Six properties are between 1/8 and 1/4 mile from the Site. Of those six, two are located downgradient of the Site and considered to have a low potential to impact the Site. The remaining four properties are upgradient of the Site; however had cleanup activities initiated between 2000 and 2005 and are therefore considered to have a low potential to impact the Site based on their regulatory status.

The remaining 13 properties are between 1/4 and 1/2 mile from the Site. These properties are all "Reported Cleaned Up", "Cleanup Activities Initiated", or are down or cross gradient from the Site, and/or have soil impacts only and are therefore considered to have a low potential to impact the Site due to their distance from the Site.

- **Underground Storage Tanks Site List (UST, 0.25 mile), February 24, 2012.** Registered USTs are regulated in Subtitle I of RCRA and must be registered with the state department responsible for administering the UST program. Source: DEC.

  There are 30 listed UST properties within 0.25 mile of the Site. With the exception of four properties, none of the UST properties have had releases or the property is down- or crossgradient or has received regulatory closure and are therefore considered unlikely to impact subsurface conditions at the Site.

  The remaining four properties are discussed as follows:

  - Hines Interest is a NFA after VCP Assessment or remediation property and considered to have a low potential to impact the Site.
  - Q-West was discussed above in the LUST section and due to the property's upgradient and nearby location considered to have a moderate potential to impact the Site.
  - Alexis Hotel was discussed above in the CSCSL section and was considered to have a moderate potential to impact the Site based on this its upgradient and nearby location.
  - Commuter Center Parking was discussed above in the CSCSL section and was considered to have a low potential to impact the Site based on its downgradient location, from the Site.

- **Aboveground Storage Tanks Locations (AST, 0.25 mile), May 27, 2009.** Listing of aboveground storage tank locations regulated by the DEC's Spill Prevention, Preparedness and Response Program. USTs are regulated in Subtitle I of RCRA and must be registered with the state department responsible for administering the UST program. Source: DEC.

  There are no listed AST properties are within 0.25 mile of the Site.

distance of the Site. Furthermore, none of the listed orphan sites were noted in the vicinity of the Site during our area reconnaissance.

Other Lists

Multiple other Non-ASTM regulatory lists summarized in the EDR report in Appendix C were also reviewed but are not listed above. Properties which were included on these lists were discussed above or not expected to impact the Site.

5.3 REGULATORY FILE REVIEW

AMEC reviewed online DEC electronic files of the LUST, ICR, and CSCSL programs for the Site address as well as some of the nearby properties. The Site does not appear in any of these databases.

5.4 DATA GAPS

The EPA's proposed All Appropriate Inquiry document [40 Code of Federal Regulations (CFR) 312.10] states that a data gap means "*a lack of or inability to obtain information required by the standards and practices listed in Subpart C of Part 312 despite good faith efforts by the environmental professional or persons identified under Part 312.1 (b), as appropriate, to gather such information pursuant to Part 312.20 (d) (1) and Part 312.20(d) (2).*"

The following presents AMEC's interpreted data gaps, resolution efforts, and our opinions on the data gap significance.

Data Gaps, Resolution Efforts and Opinion on Data Gap Significance			
General data gap description	Specific gap	Good faith efforts	Opinions on data gap significance
Historical records	Documentation was not available for all land use dates.	AMEC reviewed reasonably ascertainable maps and aerial photographs.	Low significance - The available historical information provides sufficient information to support historical uses at the Subject Property.
Interviews	Complete ownership interviews were not available.	Contacts were not readily available for owners prior to 1950. AMEC attempted to obtain information from the current owner.	Low significance - With respect to the current development, the reviewed historical photos, maps, and tenant information provides sufficient information to support historical use at the Subject Property.

7.0 ENVIRONMENTAL PROFESSIONAL STATEMENT

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

Gary A. Lieberman, CEM
Project Manager

Date July 6, 2012