CASH SPOT
11100 SOUTHEAST MCL特殊LINGLIN BOULEVARD, MILWAUKIE, OREGON

PHASE I ENVIRONMENTAL SITE ASSESSMENT AND FOCUSED INVESTIGATION

Prepared for
CITY OF MILWAUKIE
August 9, 2016
Project No. 1300.01.01

Prepared by
Maul Foster & Alongi, Inc.
2001 NW 19th Avenue, Suite 200
Portland, Oregon 97209
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**ACRONYMS AND ABBREVIATIONS**

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Definition</th>
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<tr>
<td>AAI</td>
<td>all appropriate inquiries</td>
</tr>
<tr>
<td>Ash Creek</td>
<td>Ash Creek Associates, Inc.</td>
</tr>
<tr>
<td>AST</td>
<td>aboveground storage tank</td>
</tr>
<tr>
<td>ASTM</td>
<td>American Society for Testing and Materials</td>
</tr>
<tr>
<td>bgs</td>
<td>below ground surface</td>
</tr>
<tr>
<td>CERCLA</td>
<td>Comprehensive Environmental Response, Compensation and Liability Act</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>Client</td>
<td>City of Milwaukie</td>
</tr>
<tr>
<td>COI</td>
<td>constituent of interest</td>
</tr>
<tr>
<td>CREC</td>
<td>controlled recognized environmental condition</td>
</tr>
<tr>
<td>DEQ</td>
<td>Oregon Department of Environmental Quality</td>
</tr>
<tr>
<td>ECSI</td>
<td>Environmental Cleanup Site Information</td>
</tr>
<tr>
<td>EDR</td>
<td>Environmental Data Resources, Inc.</td>
</tr>
<tr>
<td>ESA</td>
<td>environmental site assessment</td>
</tr>
<tr>
<td>LUST</td>
<td>leaking underground storage tank</td>
</tr>
<tr>
<td>MFA</td>
<td>Maul Foster &amp; Alongi, Inc.</td>
</tr>
<tr>
<td>NWTPH</td>
<td>Northwest Total Petroleum Hydrocarbon</td>
</tr>
<tr>
<td>NFA</td>
<td>No Further Action</td>
</tr>
<tr>
<td>PCB</td>
<td>polychlorinated biphenyl</td>
</tr>
<tr>
<td>the Property</td>
<td>11100 Southeast McLoughlin Boulevard, Milwaukie, Oregon</td>
</tr>
<tr>
<td>RBC</td>
<td>risk-based concentration</td>
</tr>
<tr>
<td>REC</td>
<td>recognized environmental condition</td>
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<tr>
<td>SFIM</td>
<td>Sanborn Fire Insurance Map</td>
</tr>
<tr>
<td>SVOC</td>
<td>semivolatile organic compound</td>
</tr>
<tr>
<td>TPH</td>
<td>total petroleum hydrocarbons</td>
</tr>
<tr>
<td>USEPA</td>
<td>U.S. Environmental Protection Agency</td>
</tr>
<tr>
<td>user</td>
<td>City of Milwaukie</td>
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<td>USGS</td>
<td>U.S. Geological Survey</td>
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<tr>
<td>UST</td>
<td>underground storage tank</td>
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<td>VOC</td>
<td>volatile organic compound</td>
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EXECUTIVE SUMMARY

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

At the request of the City of Milwaukie, Maul Foster & Alongi, Inc. (MFA) conducted a Phase I ESA of the site at 11100 Southeast McLoughlin Boulevard, Milwaukie, Oregon (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, this 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)(ii)).

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 Property formerly had an approximately 3,000-square-foot retail building, which was demolished in 2006. The Property currently has what remains of the parking lot.

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.

No RECs were identified for the Property.

HISTORICAL RECOGNIZED ENVIRONMENTAL CONDITIONS

ASTM E1527-13 defines historical RECs as a past release of any hazardous substances or petroleum products that has occurred in connection with the 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.

A heating-oil tank, associated with Oregon Department of Environmental Quality (DEQ) Leaking Underground Storage Tank (LUST) No. 03-08-1020, was previously located on the Property.
Confirmation samples collected after the tank decommissioning and soil removal showed that only a de minimis level of residual total petroleum hydrocarbons (TPH) remained. A groundwater sample collected in 2011 from a location reported as being downgradient of the former heating-oil tank showed a de minimis amount of diesel- and oil-range petroleum hydrocarbons below applicable DEQ generic risk-based concentrations (RBCs). DEQ has closed the LUST listing for the Property, with a note that the project is complete. A 2008 letter from DEQ to the City of Milwaukie also speaks to this status (provided in Appendix C). The former heating oil tank and de minimis level of TPH are considered a historical REC in connection with the Property.

**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.

**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.

The Kronberg Dump is located approximately 480 feet south of the Property, along the western shore of Kellogg Lake. According to the DEQ Environmental Cleanup Site Information database, between 1944 and 1970 the Kronberg Dump was filled with excess river rock from nearby sand and gravel operations and various other types of debris. Based on neighbor complaints and historical photographs, the debris included old stumps, appliances, household garbage, lumber, plaster, and wallboard. Soil samples collected from the dump were noted to contain TPH; one sample contained polychlorinated biphenyls (PCBs).

During a review of the historical aerial photographs for the Property and surrounding area, it was observed that portions of the Property were also filled within this timeframe. A Phase II ESA report for the Property prepared by Ash Creek Associates, Inc. (Ash Creek), in 2011 outlines the likely extent of fill on the Property and discussed the results of samples collected (provided in Appendix C). Neither PCBs nor petroleum hydrocarbons (gasoline-, diesel- and oil-range) were detected above method reporting limits in samples collected from fill material. Metals were detected in the soil samples, with arsenic above the DEQ RBCs but within the range of regional background concentrations. A sediment sample collected in 2011 from the Property, along the shore of Kellogg Lake, contained a de minimis amount of motor oil, and PCBs were not detected above the method reporting limit. Based on these sample results, the presence of the Kronberg Dump along the shore of Kellogg Lake has been identified as a de minimis condition.

Arsenic in soil from boring GP2B, on the southwestern portion of the Property, was detected above the generic RBCs for construction workers for dermal contact and inhalation. Note that the DEQ...
generic RBCs for arsenic, direct contact exposure scenarios are below natural background conditions in Oregon. This detection of arsenic is within the range of regional background concentrations (Portland Basin and Willamette Valley) and was observed at ten feet below ground surface. Due to the depth that this concentration was observed, the lower concentrations of arsenic observed in samples from other locations and depths on the Property (through this assessment and 2011 Phase II investigation), and the regionally high background concentrations of arsenic, this occurrence of arsenic in soil has been identified as a de minimis condition.

Shallow reconnaissance groundwater samples were observed to contain arsenic and lead above DEQ’s generic RBCs for ingestion and inhalation from tap water by residential and occupational receptors. A similar finding was observed by Ash Creek in 2011. The 2011 assessment included a risk assessment in which the shallow groundwater to receptor pathway was found to be incomplete and was therefore not identified as a REC.

Groundwater is not currently used beneficially on the Property and arsenic in the region is naturally elevated in soil. The City of Milwaukie supplies municipal water to the Property and surrounding facilities. Given the high reliability and low cost of municipal water, it is unlikely that drinking-water wells will be developed in the shallow water-bearing zone at the Property in the foreseeable future. Based on this, we agree with Ash Creek that the inhalation and ingestion exposure pathway to groundwater is likely incomplete. Therefore, these data do not appear to rise to the level of a REC for the Property. If groundwater on the Property is anticipated for future use, further assessment of water quality is recommended.

DATA GAPS

MFA was unable to identify a connection to the catch basin observed in the parking lot on the southeastern portion of the Property. It is unknown if this catch basin drains into a dry well, the city stormwater system, to Kellogg Lake, or some other location. Based on the prior use of the Property as a pawn shop this data gap does not appear significant to the findings of this report.

RECOMMENDATIONS

The user should review a current title report to obtain further assurance regarding the lack of environmental liens and activity use limitations associated with petroleum products or hazardous substances on the Property.

If groundwater on the Property is anticipated for future use, further assessment of water quality is recommended.

CONCLUSIONS

MFA has conducted a Phase I ESA, in conformance with the scope and limitations of ASTM Practice E1527-13, of 11100 Southeast McLoughlin Boulevard, Milwaukie, Oregon.

The Phase I ESA revealed no evidence of RECs in connection with the Property.
1 INTRODUCTION

1.1 Purpose

On behalf of City of Milwaukie, Maul Foster & Alongi, Inc. (MFA) conducted a Phase I environmental site assessment (ESA) of the property located at 11100 Southeast McLoughlin Boulevard, Milwaukie, Oregon (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, this 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 May 10, 2016, Ms. Caitlin Bryan 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. 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 (2011) for Lake Oswego was used as the physical setting source.

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 summarized 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 reader usability and comprehension. Consistent with this ASTM guidance document, the following issues were not 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 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

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 report 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 Services

Services performed outside the scope of ASTM Standard Practice E1527-13 for Phase I ESAs are discussed in Section 6.

1.8 Qualifications of Responsible Environmental Professionals

A 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 Milwaukie, which has permission to rely on this report, in addition to developers, real estate professionals/brokers, and engineering/architectural consulting teams. ASTM Standard Practice E1527-13 defines the “user” as the party seeking to use the standard to conduct an ESA. The Client is the user of this Phase I ESA report.
2 SITE DESCRIPTION AND RECONNAISSANCE

2.1 Objective and Methodology

Ms. Bryan of MFA conducted a site reconnaissance visit on May 10, 2016, in order to obtain information indicating the likelihood of the presence of RECs in connection with the Property. During the site reconnaissance visit, Ms. Bryan visually and/or physically observed the Property for evidence 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. The Property and adjacent properties were also observed from public thoroughfares. The Property does not contain above ground structures. Photographs taken during the site reconnaissance are included in Appendix B.

2.1.1 Limiting Conditions

Access limitations were not encountered.

2.2 General Site Setting

2.2.1 Property Location and Legal Description

The approximately 0.628-acre Property is located at 11100 Southeast McLoughlin Boulevard, Milwaukie, Oregon, in section 35, township 1 south, range 1 east, of the Willamette Meridian, on tax lots 1S1E35AD01100, 1S1E35AD01300, 1S1E35AD01301, and 1S1E35AD01302.

2.2.2 Site and Vicinity Characteristics

According to the City of Milwaukie, the Property is currently zoned “Downtown Mixed Use.” The Property is currently vacant. In general, the Property is relatively level, with a slight slope to the south.

2.2.3 Current Uses of Property

The Property is vacant, with a parking lot remaining from previous use (see Figure 1).

2.2.4 Past Uses of Property

The prior use of the Property was a pawnshop. No other uses were identified. Historically, a portion of the Property was filled.
2.2.5 Current Uses of Adjoining Properties

Adjoining properties are commercial (storefronts), with a park and Kellogg Lake to the south.

The Property is bordered by the following:

- North—Bank of the West and an office building, followed by two gas stations
- South—Kellogg Lake and a city park
- East—Commercial storefronts
- West—Oregon 99 East, followed by the Willamette River

2.2.6 Past Uses of Adjoining Properties

The past uses of adjoining properties are similar to the current uses: largely commercial, office buildings, and/or mixed use with residences.

2.2.7 Current or Past Uses in Surrounding Area

The surrounding areas appear to have transformed over time from largely residential to predominantly commercial uses.

2.2.8 Geologic, Hydrogeologic, Hydrologic, and Topographic Conditions

In general, the Property and surrounding area slope gradually toward the Willamette River to the west. The Property also displays a localized gradient toward Kellogg Lake. A Phase II investigation completed by Ash Creek Associates, Inc. (Ash Creek) for the Property in 2011 (included in Appendix C) identified fill on a portion of the Property that was described as sand and gravel to 15 feet below ground surface (bgs). Native silty sand was noted below the fill. Groundwater was encountered on the Property at depths ranging from 15 to 20 feet bgs.

2.3 Interior and Exterior Observations

<table>
<thead>
<tr>
<th>Observed on the Property?</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Structures</td>
<td>X</td>
</tr>
<tr>
<td>Roads</td>
<td>X</td>
</tr>
</tbody>
</table>

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<th>Observed on the Property?</th>
<th>Notes</th>
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<tr>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td><strong>Potable Water Supply</strong></td>
<td>X</td>
</tr>
<tr>
<td><strong>Sewage-Disposal System</strong></td>
<td>X</td>
</tr>
<tr>
<td><strong>Hazardous Substances and Petroleum Products in Connection with Identified Uses</strong></td>
<td>X</td>
</tr>
<tr>
<td><strong>Storage Tanks</strong></td>
<td>X</td>
</tr>
<tr>
<td><strong>Odors</strong></td>
<td>X</td>
</tr>
<tr>
<td><strong>Pools of Liquid</strong></td>
<td>X</td>
</tr>
<tr>
<td><strong>Drums</strong></td>
<td>X</td>
</tr>
<tr>
<td><strong>Hazardous-Substance and Petroleum-Product Containers</strong></td>
<td>X</td>
</tr>
<tr>
<td><strong>Unidentified-Substance Containers</strong></td>
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<td><strong>PCBs</strong></td>
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<tr>
<td><strong>Heating and Cooling</strong></td>
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<td><strong>Stains or Corrosion</strong></td>
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<td><strong>Drains or Sumps</strong></td>
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<td><strong>Pits, Ponds, or Lagoons</strong></td>
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<td><strong>Stained Soil or Pavement</strong></td>
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<td><strong>Stressed Vegetation</strong></td>
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<td><strong>Solid Waste</strong></td>
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<td><strong>Wastewater</strong></td>
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<tr>
<td><strong>Stormwater</strong></td>
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<tr>
<td><strong>Wells</strong></td>
<td>X</td>
</tr>
<tr>
<td><strong>Septic Systems</strong></td>
<td>X</td>
</tr>
</tbody>
</table>
3 USER-PROVIDED INFORMATION

MFA provided a Client/User Questionnaire to the Client. A copy of the form, completed by City of Milwaukie Manager Mr. William Monahan, is included as Appendix D.

3.1 Title Records

Title documents that appear to be from 2002 were provided by the Client and were reviewed to identify environmental liens or activity and use limitations, if any, that were recorded against the Property. The title documents are included as Appendix E.

3.2 Environmental Liens or Activity and Use Limitations

Mr. Monahan reported that, to the best of his knowledge, there were no environmental liens or activity and use limitations on the Property. MFA did not identify environmental liens or activity use limitations related to hazardous substances or petroleum products on the Property. Review of a current title report should be conducted by the user to provide further assurance.

3.3 Specialized Knowledge

The Client provided specialized knowledge regarding the past use of the Property as a retail store, with the structure demolished in 2006.

3.4 Commonly Known or Reasonably Ascertainable Information

The Client did not provide information commonly known or reasonably ascertainable within the local community that is relevant to RECs in connection with the Property.

3.5 Valuation Reduction for Environmental Issues

The Property is not currently listed for sale.

3.6 Owner, Property Manager, and Occupant Information

According to the Client, the Property is owned and managed by the City of Milwaukie. The Property is vacant.

3.7 Reason for Performing Phase I ESA

The Client reported that the purpose of this Phase I ESA is due diligence in preparation for issuing a request for proposals for mixed-use development of the Property.
4.1 Standard Environmental Record Sources

MFA contracted Environmental Data Resources, Inc. (EDR) to search state and federal agency record sources for information regarding the Property and sites near the Property. 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 F.

<table>
<thead>
<tr>
<th>Databases Searched</th>
<th>Sites Listed</th>
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<tbody>
<tr>
<td></td>
<td>EDR Geocheck</td>
</tr>
<tr>
<td><strong>Approximate Minimum Search Distance: 1.0 Mile from Property Boundary</strong></td>
<td></td>
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<tr>
<td>USEPA National Priorities List Sites (NPL)</td>
<td>0</td>
</tr>
<tr>
<td>Proposed NPL</td>
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<tr>
<td>Federal Delisted NPL</td>
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1 The Kellogg Creek Water Pollution Control Plant (located southeast of the Property) was identified, in the Washington landfill database as a facility that creates biosolids.
<table>
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<tr>
<th>Databases Searched</th>
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<td>United States Engineering Controls Sites List (USEC)</td>
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<td>United States Sites With Institutional Controls List (USSIC)</td>
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</table>

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

- Heating-Oil Tank (LUST No. 03-08-1020) was located on the Property.
- Arco Station (LUST No. 03-92-0096) is located at 10966 Southeast McLoughlin Boulevard, approximately 365 feet north of the Property.
- Astro Station (LUST No. 03-90-0152) is located at 11010 Southeast McLoughlin Boulevard, approximately 215 feet north of the Property.
- Bernard’s Garage (LUST No. 26-98-0884) is located at 2036 Southeast Washington Street, approximately 150 feet north of the Property.
- Heating-Oil Tank (LUST No. 03-99-0608), located at 11226 Southeast 21st Avenue, approximately 350 feet west-southwest of the Property.
- Kronberg Dump (ECSI No.5843), located approximately 480 feet south of the Property.
The remaining sites have no reported releases, have reported that cleanup is complete and/or have received No Further Action (NFA) determinations from DEQ, 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

Documentation obtained from DEQ is provided in Appendix C.

- A heating-oil tank, associated with DEQ LUST No. 03-08-1020, was previously located on the Property. Confirmation samples collected after the tank decommissioning and soil removal showed that only de minimis level of residual total petroleum hydrocarbons (TPH) remained. A groundwater sample collected in 2011 from a location reported as being downgradient of the former heating-oil tank showed a de minimis amount of diesel- and oil-range petroleum hydrocarbons below applicable DEQ generic risk-based concentrations (RBCs). DEQ has closed the LUST listing for the Property, with a note that the project is complete. A 2008 letter from DEQ to the City of Milwaukie also speaks to this status.

- Arco Station (LUST No. 03-92-0096) is located at 10966 Southeast McLoughlin Boulevard, approximately 365 feet north of the Property. MFA reviewed the 2007 DEQ NFA letter for the Arco Station site. Six abandoned USTs were discovered, resulting in the removal and off-site disposal of approximately 500 cubic yards of soil. Product and shallow groundwater were observed in the tank cavity. Remedial actions included enhanced fluid recovery in August 2000, followed by operation of a soil vapor extraction unit, which was shut down in 2003. Also in 2003, three additional USTs were decommissioned, with impacts observed in the tank cavity, although no signs of damage or corrosion were identified. Approximately 1,016 tons of impacted soil was removed from the Arco Station site. Various soil- and groundwater-monitoring events have been completed. Concentrations of benzene, total xylenes, and gasoline in soil were noted to exceed the generic RBCs for vapor intrusion into buildings for urban residential receptors. The benzene concentrations in soil also exceeded the occupational worker generic RBC for vapor intrusion into buildings. The DEQ NFA letter notes that chlorinated solvents were identified in groundwater and likely can be attributed to the upgradient Abe’s Dry Cleaners site. The vinyl chloride in particular exceeded the then-current RBC for urban residential use. As this Arco Station site is considered to be upgradient, chlorinated solvents were analyzed from samples of shallow reconnaissance groundwater from the Property (see Section 6). They were not observed above method reporting limits.

- Astro Station (03-90-0152) The Astro Station is located one block north of the Property. The Astro Station is registered as a LUST site with a cleanup completion date of October 30, 1990. MFA reviewed the 1990 DEQ NFA letter for this Astro Station site. The letter noted that groundwater wells confirmed the absence of groundwater impacts from tank decommissioning. The Astro Station site does not appear to pose a threat to the Property.
• Bernard's Garage (26-98-0884) is located at 2036 Southeast Washington Street, approximately 150 feet north of the Property. A DEQ cleanup completion date of November 11, 1999, is reported. Groundwater was not encountered, confirmation samples did not exceed the soil matrix criteria at the time, and DEQ issued an NFA determination for the Bernard’s Garage site in November 1999. Based on this information, the Bernard's Garage site does not appear to have the potential to impact the Property.

• Heating-Oil Tank (03-99-0608), located at 11226 Southeast 21st Avenue, approximately 350 feet west-southwest of the Property. The facility cleanup start date is reported as June 2, 1999, with no reported completion date. A review of the DEQ database was conducted and further information was found that identified this tank as a home-heating-oil tank that had been decommissioned. Based on this information, coupled with the distance and estimated groundwater flow direction in the area, this heating-oil tank site does not appear to pose a threat to the Property.

• Kronberg Dump (ECSI No. 5843), located approximately 480 feet south of the Property, along the western shore of Kellogg Lake. The following information was noted in the EDR report and in the DEQ ECSI database:

  Site filled with excess river rock from nearby sand and gravel operations and various types of debris between 1944 to 1970. Based on neighbor complaints and historic photos, the debris included old stumps, appliances, household garbage, old lumber, plaster and wallboard.

  Smaller portions on the north east side of Kellogg lake also appear to have been filled at this time (1944-1956) based on aerial photos, but unknown if related to Kronberg Dump or other dumping activities.

  Soil samples contained TPH and one sample contained PCBs. Potential contamination of concern includes TPH, PCBs, metals and methane.

During a review of the historical aerial photographs for the Property and surrounding area, it was observed that portions of the Property were also filled around this timeframe. The Phase II report for the Property prepared by Ash Creek in 2011 (included in Appendix C) outlines the extent of likely fill on the Property and discussed the results of samples collected (see Section 4.4 below). Neither PCBs nor petroleum hydrocarbons (gasoline-, diesel- and oil-range) were detected above method reporting limits in samples collected from fill material. Metals were detected in the soil samples, with arsenic above the DEQ generic RBCs but within the range of native background concentrations. A sediment sample collected in 2011 from the Property, along the shore of Kellogg Lake, contained a de minimis amount of motor oil, and PCBs were not detected above the method reporting limit. This sample also contained lead at a concentration above the DEQ generic RBC for soil leaching to groundwater. Based on these sample results, the presence of the Kronberg Dump along the shore of Kellogg Lake has been identified as a de minimis condition.
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


1934, 1936, and 1948: The Property is partially occupied by Kellogg Lake, with undeveloped shoreline on the northern and eastern portions. The Property appears to have been filled in the northwest corner sometime between 1936 and 1948. Uses of the surrounding area appear to be residential and/or retail.

1952: Filling between 1948 and 1952 appears to have extended the Property to the south; the lake occupies a small portion of the southwest corner of the Property. A structure and parking area occupy the northwestern portion of the Property. The surrounding area appears to consist of retail and commercial uses.


2009, 2011, and 2012: The structure on the Property appears to have been removed; the lot appears vacant and gravel-covered. Surrounding uses appear generally unchanged.

4.3.2 Sanborn Map Review

SFIMs were requested from EDR. SFIMS from 1928, 1931, and 1936 were reviewed to identify historical changes to the Property and the Property’s historical uses (see Appendix H). No structures were observed on the maps for these years. The surrounding area appears to be occupied by residences and light industrial or commercial uses, i.e., a machine shop, a tin shop, a printer, and a church.

4.3.3 City Directories


- 2013: No listing
- 2008: No listing
- 2003: Cash Spot
- 1987: No listing
- 1982: Ship Ashore
- 1977: No listing
- 1972: No listing

Listings for the surrounding area include commercial and light industrial uses and private residences.

### 4.4 Environmental Documents for Property

Environmental documents were provided by the Client and were reviewed for information applicable to this assessment. The documents are included in Appendix C.

A Phase I ESA for the McLoughlin Boulevard Retrofit Project was conducted by HWA Geosciences Inc. in 2001. This assessment covered a number of properties along McLoughlin Boulevard from north of Kellogg Creek north to Harrison Street. The Cash Spot pawnshop was present on the Property at the time of this assessment. An underground injection system (dry well) for the footing drains was identified on the Property. A possible UST was also identified on the Property. Further investigation of the area near the suspected UST (on the northwestern portion of the Property) was recommended.

Phase I and Phase II ESAs of the Property as well as the adjacent tax lot on the northwest corner of the block (the Bolouri Property) were conducted in 2011 by Ash Creek for Metro (reports are included in Appendix C). The building on the Property was demolished in 2008, and during that process an underground heating-oil tank was discovered. Approximate 65 tons of petroleum-impacted soil was removed and taken to the Hillsboro Landfill. Confirmation samples showed residual TPH (i.e., at concentrations of less than 100 parts per million).

The Phase II investigation revealed low concentrations of diesel- and oil-range hydrocarbons (believed by the authors to have originated from the heating-oil tank) at location PP2 (see Figure 2) and metals. Arsenic was detected above the DEQ generic risk-based criterion, although it was noted in the report that these were naturally occurring concentrations. Because the detected concentrations were low, these conditions were not identified as RECs.

A number of adjacent and nearby sites with confirmed or suspected petroleum-hydrocarbon impacts were discussed in the Phase II report (the Astro and Arco fueling stations to the north, the north adjacent Bank of the West property, and the former collision repair shop, also located to the north). Based on a review of the records associated with these sites, coupled with the findings of the Phase II investigation, Ash Creek determined that these sites did not represent RECs on the Property.
5 INTERVIEWS

5.1 Interview(s) with Representative(s) of Owner

Ms. Bryan of MFA was directed to Mr. William A. Monahan, representative for the current Property owner, for general and site-specific information regarding the Property. Mr. Monahan is the City of Milwaukie city manager. Mr. Monahan indicated that, to his knowledge, there were no pending, threatened, or past litigation or administrative proceedings relevant to hazardous substances or petroleum products on the Property. He was aware of no notices from any government agency regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products relative to the Property. According to Mr. Monahan, there are no environmental liens on the Property.

Mr. Monahan noted that a 3,000-square-foot building, which had a variety of retail uses, occupied the Property until the building was demolished in 2006.

5.2 Interview with Key Site Manager

The owners are also the site managers. Please see Section 5.1 for the interview with the representative for the owner.

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 and/or is not likely to be relevant to this assessment.

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

Ms. Caitlin Bryan of MFA spoke with Mr. Henning Larsen, a DEQ senior hydrologist familiar with the Milwaukie area. Ms. Bryan inquired about the Property and surrounding area as well as the Milwaukie area wide groundwater concerns that were noted in a number of regulatory database listings reviewed. Mr. Larsen described the history of identification of the area wide groundwater concern, the hypothesized extent, the Portland Hills fault, and the depth at which groundwater impacts would most likely be observed. In summary, tetrachloroethylene, trichloroethylene, and 1,1,1-trichloroethane have been identified in groundwater approximately one mile northwest from the Property. Mr. Larson indicated that these impacts are likely from a number of sources and they quickly become deep as the plume extends to the northwest. Do to the distance from the plume and...
the presence of the Portland Fault in the area, Mr. Larson believes it does not appear as though the area wide concerns are likely to impact the Property.

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

Interviews with owners or occupants of nearby properties are required for properties that have been abandoned and that 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 ADDITIONAL SERVICES

Because of the documented releases of petroleum hydrocarbons and contamination to soil and groundwater on the northern half of the Property, a Phase II focused investigation was conducted in June 2016 to further evaluate the presence of contamination. MFA contracted a drilling company licensed in the State of Oregon (Stratus Corporation). Stratus Corporation used a Geoprobe™ 7822 DT drill rig to advance two exploratory borings to collect soil and reconnaissance groundwater samples, which were submitted to a laboratory (ESC Lab Sciences) for analysis.

Before conducting fieldwork, MFA contacted Oregon One Call to locate public underground utilities entering the Property. In addition, MFA subcontracted with Pacific Geophysics of Portland, Oregon, to check for potential underground anomalies such as USTs that could be present at the Property. Pacific Geophysics used a Geometrics G858 cesium vapor magnetometer and a GSSI SIR2000 ground-penetrating radar to create a contour map of the subsurface. Pacific Geophysics also checked the vicinity of the proposed boring locations for underground utilities.

6.1 Geology

The boring locations are shown on Figure 3. Boring logs are included in Appendix J.

An asphalt and gravel fill layer was encountered in both borings from ground surface to approximately 0.5 foot to 1 foot bgs. Generally, most of the soil encountered was silt, silt with gravel, and silt with sand. Groundwater was encountered at 10 feet bgs in boring GP1A and 17.4 feet bgs in boring GP2B.

Groundwater samples were collected from both borings and water quality parameters recorded on field sampling data sheets, which are included in Appendix J.

6.2 Analytical Methods

Soil samples were analyzed for the following constituents of interest (COIs):
Diesel- and oil-range hydrocarbons (Dx) by Northwest Total Petroleum Hydrocarbon (NWTPH) Method

Gasoline-range hydrocarbons (Gx) by Northwest Method NWTPH-Gx

Volatile organic compounds (VOCs) by USEPA Method 8260B

Metals by USEPA Method 6010B (arsenic, barium, cadmium, chromium, iron, lead, manganese, selenium, and silver)

Semivolatile organic compounds (SVOCs) by USEPA Method 8270D-SIM

Reconnaissance groundwater samples were analyzed for the following COIs:

Diesel- and oil-range hydrocarbons by Northwest Method NWTPH-Dx

Gasoline-range hydrocarbons by Northwest Method NWTPH-Gx

VOCs by USEPA Method 8260B

Total metals by USEPA Method 6010B (arsenic, barium, cadmium, chromium, iron, lead, manganese, selenium, and silver)

SVOCs by USEPA Method 8270D-SIM

PCBs by Method 8082

Reconnaissance groundwater and soil sampling locations, depths, and analytical results are summarized in Tables K-1 and K-3, respectively, in Appendix K. Results with detections are annotated in bold font, and results with exceedances of screening criteria are annotated using highlighted cells. Appendix K also contains a laboratory report and a data validation memorandum.

6.3 Soil Analytical Results

Soil sample results were screened against the following DEQ generic RBCs:

- Construction Worker Ingestion Dermal Contact and Inhalation
- Excavation Worker Soil Ingestion Dermal Contact and Inhalation
- Residential Volatilization to Outdoor Air
- Urban Residential Volatilization to Outdoor Air
- Occupational Volatilization to Outdoor Air
- Residential Vapor Intrusion into Buildings
- Urban Residential Vapor Intrusion into Buildings
- Occupational Vapor Intrusion into Buildings
- Background Metals, Portland Basin

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2 [http://www.deq.state.or.us/lq/pubs/docs/RBDMTable.pdf](http://www.deq.state.or.us/lq/pubs/docs/RBDMTable.pdf), accessed 7/20/2016, revision date November 1, 2015.

R:\1300.01 City of Milwaukie\Document\01_2016.08.09 Cash Spot Phase I ESA\Rf_Phase I ESA Cash Spot.docx
One soil sample was collected from each boring, at 10 feet bgs. Because of the depth at which these samples were collected, screening against the DEQ RBCs for residential, urban residential, and occupational receptor exposure via dermal contact and inhalation is not relevant.

Arsenic in soil from boring GP2B, on the southwestern portion of the Property, was detected above the generic DEQ RBC for construction workers for dermal contact and inhalation. This detection of arsenic is within the range of regional background concentrations from 8.8 milligrams per kilogram in the Portland Basin to 18 milligrams per kilogram in the Willamette Valley\(^3\). Detections of petroleum hydrocarbons and related constituents were below generic risk-based criteria.

### 6.4 Groundwater Analytical Results

Groundwater sample results were screened against the following DEQ generic RBCs:

- Residential Ingestion and Inhalation from Tap Water
- Urban Residential Ingestion and Inhalation from Tap Water
- Occupational Ingestion and Inhalation from Tap Water
- Residential Volatilization to Outdoor Air
- Urban Residential Volatilization to Outdoor Air
- Occupational Volatilization to Outdoor Air
- Residential Vapor Intrusion into Buildings
- Urban Residential Vapor Intrusion into Buildings
- Occupational Vapor Intrusion into Buildings
- Construction and Excavation Worker Groundwater in Excavation

A temporary, 0.75-inch-diameter polyvinyl chloride well with a 5-foot screen was placed from 10 to 15 feet bgs in boring GP1A, and from 15 to 20 feet bgs in boring GP2B. Tubing was inserted into the screen and reconnaissance groundwater samples were collected from near the middle of the screened interval (12.5 and 17.5 feet bgs).

Shallow reconnaissance groundwater from boring GP2B on the northwestern portion of the Property was observed to contain arsenic above DEQ’s generic RBC for ingestion and inhalation from tap water by residential and occupational receptors. Lead also exceeded these criteria from both borings. Note that the total fraction of metals was analyzed and the samples were collected from reconnaissance borings (not established monitoring wells), which can be biased high because of turbidity and contact with soil.

### 6.5 Focused Investigation Findings and Opinions

Arsenic in soil from boring GP2B, on the southwestern portion of the Property, was detected above the DEQ generic RBC for construction workers for dermal contact and inhalation. Note that the DEQ generic RBCs for arsenic, direct contact exposure scenarios are below natural background conditions in Oregon. This detection of arsenic is within the range of anticipated regional

\(^3\) [http://www.deq.state.or.us/lq/pubs/docs/cu/DebORbackgroundMetal.pdf](http://www.deq.state.or.us/lq/pubs/docs/cu/DebORbackgroundMetal.pdf) accessed 7/20/2016.
background concentrations (for the Portland Basin and Willamette Valley) and was observed at ten feet below ground surface. Due to the depth that this concentration was observed, the lower concentrations of arsenic observed in samples from other locations and depths on the Property (through this assessment and 2011 Phase II investigation), and the regionally high background concentrations of arsenic, this occurrence of arsenic in soil has been identified as a de minimis condition.

Shallow reconnaissance groundwater samples were observed to contain arsenic and lead above DEQ's generic RBC for ingestion and inhalation from tap water by residential and occupational receptors. A similar finding was observed by Ash Creek in 2011. The 2011 assessment included a risk assessment in which the shallow groundwater to receptor pathway was found to be incomplete and was therefore not identified as a REC.

Groundwater is not currently used beneficially on the Property and arsenic in the region is naturally elevated in soil. The City of Milwaukie supplies municipal water to the Property and surrounding facilities. Given the high reliability and low cost of municipal water, it is unlikely that drinking-water wells will be developed in the shallow water-bearing zone at the Property in the foreseeable future. Therefore, these data do not appear to rise to the level of a REC for the Property. If groundwater on the Property is anticipated for future use, further assessment of water quality is recommended.

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.

No RECs were identified for the Property.

7.2 Historical Recognized Environmental Conditions

ASTM E1527-13 defines historical RECs as a past release of any hazardous substances or petroleum products that has occurred in connection with the 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.

A heating-oil tank, associated with DEQ LUST No. 03-08-1020, was previously located on the Property. Confirmation samples collected after the tank decommissioning and soil removal showed that only de minimis level of residual TPH remained. A groundwater sample collected in 2011 from a location reported as being downgradient of the former heating-oil tank showed a de minimis amount of diesel- and oil-range petroleum hydrocarbons below applicable DEQ generic RBCs.
DEQ has closed the LUST listing for the Property, with a note that the project is complete. A 2008 letter from DEQ to the City of Milwaukie also speaks to this status.

### 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.

The Kronberg Dump is located approximately 480 feet south of the Property, along the western shore of Kellogg Lake. According to the DEQ Environmental Cleanup Site Information database, between 1944 and 1970 the Kronberg Dump site was filled with excess river rock from nearby sand and gravel operations and various other types of debris. Based on neighbor complaints and historical photographs, the debris included old stumps, appliances, household garbage, lumber, plaster, and wallboard. Soil samples collected from the dump were noted to contain TPH; one sample contained PCBs.

During a review of the historical aerial photographs for the Property and surrounding area, it was observed that portions of the Property were also filled within this timeframe. A Phase II ESA report for the Property prepared by Ash Creek in 2011 outlines the likely extent of fill on the Property and discussed the results of samples collected (provided in Appendix C). Neither PCBs nor petroleum hydrocarbons (gasoline-, diesel- and oil-range) were detected above method reporting limits in samples collected from fill material. Metals were detected in the soil samples, with arsenic above the DEQ generic RBCs but within the range of regional background concentrations. A sediment sample collected in 2011 from the Property, along the shore of Kellogg Lake, contained a de minimis amount of motor oil, and PCBs were not detected above the method reporting limit. Based on these sample results, the presence of the Kronberg Dump along the shore of Kellogg Lake has been identified as a de minimis condition.

Arsenic in soil from boring GP2B, on the southwestern portion of the Property, was detected above the generic RBCs for construction workers for dermal contact and inhalation. This detection of arsenic is within the range of regional background concentrations (for the Portland Basin and Willamette Valley) and was observed at ten feet below ground surface. Due to the depth that this concentration was observed, the lower concentrations of arsenic observed in samples from other locations and depths on the Property (through this assessment and 2011 Phase II investigation), and the regionally high background concentrations of arsenic, this occurrence of arsenic in soil has been identified as a de minimis condition.
Shallow reconnaissance groundwater samples were observed to contain arsenic and lead above DEQ’s generic RBC for ingestion and inhalation from tap water by residential and occupational receptors. A similar finding was observed by Ash Creek in 2011. The 2011 assessment included a risk assessment in which the shallow groundwater to receptor pathway was found to be incomplete and was therefore not identified as a REC. Groundwater is not currently used beneficially on the Property and arsenic in the region is naturally elevated in soil. The City of Milwaukie supplies municipal water to the Property and surrounding facilities. Given the high reliability and low cost of municipal water, it is unlikely that drinking-water wells will be developed in the shallow water-bearing zone at the Property in the foreseeable future. Based on this, we agree with Ash Creek that the inhalation and ingestion exposure pathway to groundwater is likely incomplete. Therefore, these data do not appear to rise to the level of a REC for the Property. If groundwater on the Property is anticipated for future use, further assessment of water quality is recommended before the water is used beneficially.

7.5 Data Gaps

MFA was unable to identify a connection to the catch basin observed in the parking lot on the southeastern portion of the Property. It is unknown if this catch basin drains into a dry well, the city stormwater system, to Kellogg Lake, or some other location.

7.6 Recommendations

The user should review a current title report to obtain further assurance regarding the lack of environmental liens and activity use limitations associated with petroleum products or hazardous substances on the Property.

If groundwater on the Property is anticipated for future use, further assessment of water quality is recommended.

7.7 Activity Use Limitations Compliance

Activity use limitations related to hazardous substances or petroleum products were not identified.

7.8 Statement of Environmental Professionals Conducting Phase I Environmental Site Assessment

CASH SPOT
11100 SOUTHEAST MCLoughlin BOULEVARD, MILWAUKIE, OREGON

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

MAUL FOSTER & ALONGI, INC.
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 11100 Southeast McLoughlin Boulevard, Milwaukie, Oregon, the Property. Any exceptions to, or deviations from, this practice are described in Section 1 of this report.

The Phase I ESA revealed no evidence of RECs in connection with the Property.

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.
Figure 1
Property Location
Cash Spot
City of Milwaukie
Milwaukie, Oregon

Legend
Property Boundary

Source: Aerial photograph obtained from Esri, ArcGIS Online

Note: All features are approximate.
Figure 2
Property Overview
Cash Spot
City of Milwaukie
Milwaukie, Oregon

Legend
- Catch Basin
- Location PP2
- Property & Tax Lot Boundary

This product is for informational purposes and may not have been prepared for, or be suitable for legal, engineering, or surveying purposes. Users of this information should review or consult the primary data and information sources to ascertain the usability of this information.

Source: Aerial photograph obtained from Esri, ArcGIS Online

Note: All features are approximate.
Figure 3
Boring Locations
Cash Spot
City of Milwaukie
Milwaukie, Oregon

Legend
- Boring Location
- Catch Basin
- Former Location PP2
- Property Boundary

Source: Aerial photograph obtained from Esri, ArcGIS Online

Note: All features are approximate.