

# Phase I Environmental Site Assessment

## Greenwater Storage

2005 Cottage Road East, 1705, 1808, 1820 to 1904, 2008, and 2111 East Valley Highway East, and 2120 Lakeland Hills Way

Sumner, Pierce County, Washington

January 23, 2024 | Terracon Project No. 81237631

**Prepared for:**

GREE BN LLC  
515 N. Flagler Drive P200  
West Palm Beach, FL



**Prepared by:**

Terracon Consultants, Inc.  
Mountlake Terrace, Washington



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- Facilities
- Environmental
- Geotechnical
- Materials

REVIEW #2  
SEPA-2024-0001



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January 23, 2024

GREE BN LLC  
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Attn: Margaret Nolan

Re: Draft Phase I Environmental Site Assessment  
Greenwater Storage  
2005 Cottage Road East, 1705, 1808, 1820 to 1904, 2008, and  
2111 East Valley Highway East, and 2120 Lakeland Hills Way  
Sumner, Pierce County, Washington 98390  
Terracon Project No. 81237631

Dear Ms. Nolan:

Terracon Consultants, Inc. (Terracon) is pleased to submit the enclosed Phase I Environmental Site Assessment (ESA) report for the above-referenced subject property (hereinafter known as the 'site'). This assessment was performed in accordance with Terracon Proposal No. P81237631, dated November 21, 2023.

We appreciate the opportunity to be of service to you on this project. In addition to Phase I services, our professionals provide other environmental, geotechnical, construction materials, and facilities services on a wide variety of projects locally, regionally, and nationally. For more detailed information on all of Terracon's services please visit our website at [www.terracon.com](http://www.terracon.com). If there are any questions regarding this report or if we may be of further assistance, please do not hesitate to contact us.

Sincerely,

**Terracon Consultants, Inc.**

Madeleine M. Hummer, L.G.  
Senior Staff Geologist

Matt Wheaton, L.G., P.E.  
Department Manager

Attachments

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## EXECUTIVE SUMMARY

This Phase I Environmental Site Assessment (ESA) was performed in accordance with Referring Document selection, and was conducted consistent with the procedures included in ASTM E2247-16, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property*. The purpose of this ESA was to assist the client in developing information to identify RECs in connection with the site as reflected by the scope of this report. The ESA was conducted under the supervision or responsible charge of Madeleine M. Hummer, Environmental Professional, who also performed the site reconnaissance on January 12, 2024.

### Findings and Opinions

A summary of findings is provided below. It should be recognized that details were not included or fully developed in this section, and the report must be read in its entirety for a comprehensive understanding of the items contained herein.

### Site Description and Use

The site is an approximately 160-acre tract of land comprised of numerous contiguous site parcels identified as two separate groups. Parcel A is located at 1808, 18020 to 1904, and 2008 East Valley Highway East, Sumner, Pierce County, Washington (Pierce County Parcel Nos. 9520000-174, -173, -168, and portions of Pierce County Parcel Nos. 9520000-152, -143, -121, and -101) and Parcel B is located at 2005 Cottage Road East, 2111 East Valley Highway East, and 2120 Lakeland Hills Way, Sumner, Pierce County, Washington (portions of Pierce County Parcel Nos. 0520072-002, 9520000-110 & -071, 520072-004, 520071-007, and 520071-008), and Parcel C is located at 1705 East Valley Highway East (Pierce County Parcel No. 9520000-151).

The northern portion of Parcel A is improved with a gravel parking lot occupied and operated by Western Self Storage, a self-storage lot for personal boats, trailers, and RVs. The remaining portions of Parcel A are occupied and operated by Peterson Bros, Inc., a guardrail and concrete barrier construction fencing company, and includes an approximately 9,775-square-foot (sf) vacant gym, an approximate 300-sf City of Sumner well pump house, and gravel and asphalt paved areas used for construction barrier storage. Nearly all of Parcel B is undeveloped land with Cottage Road East traversing east to west and north to south, three equipment buildings associated with the Cascade Water Alliance which are approximately 2,420-sf, 272-sf, and 224-sf, and numerous overhead powerlines. The majority of Parcel B is owned and operated by Cascade Water Alliance and the eastern most of Parcel B is owned and operated by Puget Sound Energy (PSE). Parcel C is undeveloped land and is owned by a private individual. Terracon understands the client intends to lease portions of the parcels for an energy storage facility and associated aboveground utility lines.



## Historical Information

Based on a review of historical information, Parcel A was developed with the existing gym building in 1928, operated as the Dieringer School from 1928 to 1990, and was historically utilized as agricultural land with former single-family residences by at least 1941. A single-family residence on Parcel A was moved by 1972 and the majority of Parcel A began being used for storage by 1998. The northern most portion of Parcel A was also associated with a historical landfill, that is discussed further in the Records Review section, below. The remaining single-family residence on the northern portion of Parcel A was demolished in 2005 and the northern portion of Parcel A was turned into self-storage.

Parcel B is majority undeveloped land and was developed with an unpaved roadway (Cottage Road East) traversing north to south and several single-family residential buildings on Parcel B, constructed in 1912 and 1921, and a commercial building on the southwest portion of Parcel B by at least 1941. Equipment buildings associated with the north-adjointing pump station were constructed along Cottage Road East on Parcel B in 1956 and 1988. By 1981, Parcel B was cleared, and several unpaved roadways were constructed. By 2006, power lines were constructed traversing east to west through Parcel B and one of the commercial buildings on the southwest portion of Parcel B was demolished. By 2009, the commercial building on the southwest portion of Parcel B and the single-family residences on Parcel B were demolished. Parcel C has been undeveloped land from at least 1941 to the present.

The adjoining properties historically consisted of agricultural and undeveloped land, with single-family residences and commercial structures to the north and/or west of Parcel A, Parcel B, and Parcel C by at least 1941, with East Valley Highway East traversing north to south between Parcel A, Parcel B, and Parcel C and a railroad traversing north to south, west-adjointing Parcel A. The existing structures west of Parcel A were constructed in 1928 and by 1986 the properties were used as storage. Additionally, the existing substation to the north of Parcel B was constructed by 1968. The existing White River Substation was constructed to the east of Parcel B by 1968. The existing buildings west of Parcel A were constructed by 2004. Furthermore, the single-family residence to the north of Parcel A was replaced with the existing commercial buildings in 2004. By 2006, the land to the southeast of Parcel B was cleared and graded in preparation for development, and by 2009, the existing single-family residential development was constructed and the residential buildings to the southwest of Parcel B were demolished.

## Prior Reports

The Riley Group, Inc. (RGI) completed a Phase I ESA, dated October 28, 2011, for the parcels owned and operated by Peterson Bros, Inc. (Pierce County Parcel Nos. 9520000-152, -143, -121, and -101), which include several entire parent parcels of Parcel A. RGI noted that the gym was "currently and historically heated by natural gas" and the owner



at the time, Mr. Gary Peterson, provided RGI documents regarding the former natural gas use at Parcel A. However, those documents were not appended in the report nor provided to Terracon for review. RGI identified RECs associated with the site they were investigating, which included features that are not located on Parcel A. RGI recommended that further investigation be completed in association with the noted RECs.

Given Terracon's review of RGI's 2011 Phase I ESA, Terracon did not identify RECs associated with the features RGI identified on the west-adjointing parent parcels of Parcel A.

### Records Review

Selected federal and state environmental regulatory databases as well as responses from state and local regulatory agencies were reviewed. The site was listed as Kiblinger, addressed as 1706 East Valley Highway, and includes the northern portion of Parcel A. The site is listed on the Tacoma-Pierce County Closed Landfill Survey (TP HIST LF) and Solid Waste Facility Database (SWF/LF) databases. According to the environmental regulatory report, the site operated as a historical landfill and was opened April 1988. Tacoma Pierce County Health Department (TPCHD) provided Terracon with documents regarding the Kiblinger landfill. The documents include photos from 1989, a Closed Landfill/Dumpsite Report that is not dated, correspondence from the property owner and TPCHD, and an Application for Disposal Site Permit dated April 1988. A sketch map dated July 18, 1989 depicts the location of raw garbage on the southwestern portion of the site and lawn mowers, engines, refrigerators, and car bodies on the northeast portion of the site. Another sketch map dated July 26, 1989, depicts the site with the locations of the sixteen test pits and the "edge of fill" on the western portion of the site. Grading and filling notes from January 1989 indicate that backfill was used and considered clean material. A letter from TPCHD dated July 27, 1989, noted that sixteen test holes were excavated throughout the site to determine the extent of solid waste fill. Broken concrete, sheetrock, and roofing materials was observed in some of the test pits and the rest of the test pits observed fill as "clean dirt." The photos provided showed concrete and asphalt debris, household wares and plastics, various metals, and a cluster of 55-gallon drums with unknown contents. Given the unknown source of the material dumped at the site and the absence of analytical results, there is a potential that an undocumented release from the dumped materials has occurred and impacted the subsurface. Therefore, the historical landfill is considered a Recognized Environmental Condition (REC).

The site was listed as Puget Sound Energy (PSE) White River Generating Station, addressed as 2111 East Valley Highway East, the southwest portion of Parcel B, (Pierce County Parcel No. 9520000-071), and was identified on the Facility Registry Service/Facility Index (FINDS/FRS), Independent Cleanup Report (ICR), Resource Conservation and Recovery Act – Non-Generator (RCRA NONGEN) Environmental Report





Tracking System (ERTS), Spills Incidents Sites (SPILLS), Confirmed and Suspected Contaminated Sites List (CSCSL), Underground Storage Tank (UST), and Leaking UST (LUST) databases. Terracon conducted a file review with the Washington State Department of Ecology (Ecology) to identify former remedial activities conducted at the site. According to a Site Assessment Report for the Underground Storage Tank Removal provided by the Washington State Department of Ecology (Ecology), dated December 1, 1995, completed by Golder Associates, two USTs used to store gasoline and diesel associated with the north-adjointing White River Generating Station were located on the western portion of the site to the west of East Valley Highway East (Parcel B). The USTs were installed in 1987 and removed in 1995. The former buildings located on the western portion of Parcel B reportedly operated as a carpenter shop, garage, storage shed and fueling area for the generating station. Based on information provided in an Environmental Site Characterization and Cleanup Action Report provided by Ecology, dated January 28, 2008, completed by GeoEngineers, starting in 2005, gasoline-, diesel- and oil-range total petroleum hydrocarbons (TPH) and metals were identified in site soil and groundwater at concentrations exceeding their respective Washington State Model Toxics Control Act (MTCA) Method A cleanup levels. From 2005 through 2007, GeoEngineers completed supplemental site characterization and remedial activities to address on-site contamination. GeoEngineers also identified a former 500-gallon closed in-place UST that was reportedly filled with concrete in the 1980s in the former garage. However, at the time of the remedial excavation, USTs were not encountered.

A total of approximately 2,200 cubic yards of contaminated soil was removed to a maximum depth of six feet below ground surface (bgs) and 104 confirmation soil samples were collected and analyzed for several or all of the following analytes: gasoline-, diesel and oil-range total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, xylenes (BTEX), polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), volatile organic compounds (VOCs), arsenic and lead. Although analytical results were not identified at concentrations exceeding their respective MTCA Method A cleanup levels at the final limits of the excavation, GeoEngineers did not collect soil samples in the immediate vicinity of the former gasoline and diesel USTs, or groundwater samples in the immediate vicinity or down-gradient of the heating oil UST, the gasoline and diesel USTs or the former UST in the garage. Additionally, based on GeoEngineers report and figures depicting the remedial excavation in the 2008 Cleanup Action Report, there are several areas throughout the site where confirmation samples were identified above cleanup levels and the area was 'over excavated' and a final confirmation sample was not collected.

Based on this information, Terracon identifies the potential for residual soil and/or groundwater impacts to be present in the subsurface of the site associated with area-wide metal impacts, the former gasoline and diesel USTs, the former UST in the former garage and the former heating oil UST as RECs for the site.



The remaining facilities listed in the database report do not appear to represent RECs to the site at this time based upon regulatory status, apparent topographic gradient, and/or distance from the site.

### Site Reconnaissance

At the time of the site reconnaissance, Parcel A was operating as Western Self Storage and Peterson Bros, Inc., Parcel B was undeveloped land associated with the Cascade Water Alliance and PSE, and Parcel C was undeveloped land. The following features were observed: suspended natural gas heaters, storm water catch basins, a pad-mounted transformer, road construction equipment (metal barriers, fencing, concrete barriers, trucks, trailers, and signage), and two domestic water wells, all located on Parcel A. RECs were not identified in association with the observed features. See the below table for a further discussion of features associated with areas of environmental interest.

Areas of Environmental Interest	Observations
Parcel A – Western Self Storage	The northern portion of Parcel A operates as a self-storage facility for boats, trailers, and RVs on a gravel lot. Staining or evidence of releases were not observed in the vicinity of the stored vehicles. However, the property is located on a former landfill, discussed further in the <u>Records Review</u> section.
Parcel A – Peterson Bros, Inc.	The majority of Parcel A operates as Peterson Bros, Inc., and utilizes the site as storage for equipment and supplies. RECs were not identified in this area during the site reconnaissance.
Parcel B – Cascade Water Alliance Equipment Buildings	Three equipment buildings owned and operated by Cascade Water Alliance were observed on Parcel B. RECs were not identified in this area during the site reconnaissance.

### Adjoining Properties

The site is adjoined to the north by Western Self Storage (1526 East Valley Highway), single-family residences (1705, 1721, 1807, and 1921 East Valley Highway East), and undeveloped parent parcels (2005 Cottage Road East & 2120 Lakeland Hills Way); to the east by Lakeland Hills Way followed by undeveloped land (2212 Sumner Tapps Highway East); to the south by Peterson Bros, Inc. parent parcel (no address), undeveloped land (2005 Cottage Road East), and a single-family residential development (16003-16225 22nd Street East); and to the west by Cascade Water Alliance Powerhouse (2111 East Valley Highway East), undeveloped land, East Valley Highway East followed by a substation and commercial property (2110 East Valley Highway East), parent parcels (1808, 1820, and 2008 East Valley Highway East), a railroad and undeveloped land. RECs were not observed with the remaining adjoining properties.



## Significant Data Gaps

Significant data gaps were not identified during this assessment.

## Conclusions

We have performed a Phase I ESA consistent with the procedures included in ASTM Practice E2247-16 at 2005 Cottage Road East, 1705, 1808, 1820 to 1904, 2008, and 2111 East Valley Highway East, and 2120 Lakeland Hills Way, Sumner, Pierce County, Washington, the site. Controlled RECs (CRECs) and/or Significant Data Gaps (SDGs). The following RECs were identified in connection with the site:

- The potential for a release to have occurred and impacted the subsurface from the historical landfill operations on Parcel A.
- The potential for residual metal impacts to be present in the surficial soil on Parcel B.
- The potential for residual petroleum impacts in groundwater associated with the former gasoline and diesel USTs to be present in the subsurface of the site on Parcel B.
- The potential for residual petroleum impacts in groundwater associated with the former heating oil UST to be present in the subsurface of the site on Parcel B.

## Recommendations

Based on the scope of services, limitations, and conclusions of this assessment, Terracon recommends conducting additional investigation to evaluate subsurface conditions associated with the former landfill on Parcel A.

It is Terracon's understanding that the client will be constructing overhead utility lines on an easement through Parcel A and Parcel B. If proposed development plans on Parcel B include ground disturbance in the vicinity of the documented or suspected impacts associated with the former on-site PSE operations, Terracon recommends that additional investigation be completed in those areas on Parcel B.

Although, not considered a REC, and while Terracon did not identify documentation that suggested a use of heating oil, there is a potential that heating oil stored in underground storage tanks was once used as a potential backup fuel source for the vacant gym building located on Parcel A. Therefore, Terracon recommends that if an underground storage tank is encountered during site redevelopment, that it be handled in accordance with Washington State regulation.



# 1.0 INTRODUCTION

## 1.1 Site Description

<b>Site Name</b>	Greenwater Storage
<b>Site Location/Address</b>	<p><b>Parcel A:</b> 1808, 18020 to 1904, and 2008 East Valley Highway East, Sumner, Pierce County, Washington (Pierce County Parcel Nos. 9520000-174, -173, &amp; -168 and portions of Pierce County Parcel Nos. 9520000-152, -143, -121, and -101)</p> <p><b>Parcel B:</b> 2005 Cottage Road East, 2111 East Valley Highway East, and 2120 Lakeland Hills Way, Sumner, Pierce County, Washington (portions of Pierce County Parcel Nos. 0520072-002, 9520000-110 &amp; -071, 520072-004, 520071-007, and 520071-008)</p> <p><b>Parcel B:</b> 1705 East Valley Highway East (Pierce County Parcel No. 9520000-151)</p>
<b>Land Area</b>	<p><b>Parcel A:</b> Approximately 10 acres</p> <p><b>Parcel B:</b> Approximately 55 acres</p> <p><b>Parcel C:</b> Approximately 1.95-acre</p>
<b>Site Improvements</b>	<p><b>Parcel A:</b> Improved with a gravel parking lot for self-storage, an approximately 9,775-square-foot (sf) vacant gym, an approximate 300-sf City of Sumner well pump house, and gravel and asphalt areas used for construction barrier storage.</p> <p><b>Parcel B:</b> Improved with three equipment buildings associated with the Cascade Water Alliance which are approximately 2,420-sf, 272-sf, and 224-sf, overhead powerlines, and undeveloped forested land.</p> <p><b>Parcel C:</b> Undeveloped forested land</p>
<b>Anticipated Future Site Use</b>	An energy storage facility and associated aboveground utility lines
<b>Reason for the ESA</b>	Leasing the site

The location of the site is depicted on Exhibit 1 of Appendix A, which was reproduced from a portion of the USGS 7.5-minute series topographic map. The site and adjoining properties are depicted on the Site Diagram, which is included as Exhibit 2 of Appendix A and the site parcel information is included as Exhibit 3 of Appendix A. Acronyms and terms used in this report are described in Appendix F.



## 1.2 Scope of Services

This Phase I ESA was performed in accordance with Terracon Proposal No. P81237631, dated November 21, 2023, and was conducted consistent with the procedures included in ASTM E2247-16, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property*. The purpose of this ESA was to assist the client in developing information to identify Recognized Environmental Conditions (RECs) in connection with the site as reflected by the scope of this report. This purpose was undertaken through user-provided information, a regulatory database review, historical and physical records review, interviews, including local government inquiries, as applicable, and a visual noninvasive reconnaissance of the site and adjoining properties. Limitations, ASTM deviations, and significant data gaps (if identified) are noted in the applicable sections of the report.

ASTM E2247-16 includes the definition of "migrate/migration," which refers to "the movement of hazardous substances or petroleum products in any form, including, for example, solid and liquid at the surface or subsurface, and vapor in the subsurface." By including this explicit reference to migration in ASTM E2247-16, the Standard clarifies that the potential for vapor migration should be addressed as part of a Phase I ESA. This Phase I ESA has considered vapor migration in evaluation of RECs associated with the site.

## 1.3 Standard of Care

This ESA was performed in accordance with generally accepted practices of this profession, undertaken in similar studies at the same time and in the same geographical area. We have endeavored to meet this standard of care, but may be limited by conditions encountered during performance, a client-driven scope of work, or inability to review information not received by the report date. Where appropriate, these limitations are discussed in the text of the report, and an evaluation of their significance with respect to our findings has been conducted.

Phase I ESAs, such as the one performed at this site, are of limited scope, are noninvasive, and cannot eliminate the potential that hazardous, toxic, or petroleum substances are present or have been released at the site beyond what is identified by the limited scope of this ESA. In conducting the limited scope of services described herein, certain sources of information and public records were not reviewed. It should be recognized that environmental concerns may be documented in public records that were not reviewed. No ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs. No warranties, express or implied, are intended or made. The limitations herein must be considered when the user of this report formulates opinions as to risks associated with the site or otherwise uses the report for any other purpose. These risks may be further evaluated – but not



eliminated – through additional research or assessment. We will, upon request, advise you of additional research or assessment options that may be available and associated costs.

## 1.4 Additional Scope Limitations, ASTM Deviations, and Data Gaps

Based upon the agreed-on scope of services, this ESA did not include subsurface or other invasive assessments, vapor intrusion assessments or indoor air quality assessments (i.e., evaluation of the presence of vapors within a building structure), business environmental risk evaluations, or other services not particularly identified and discussed herein. Credentials of the company (Statement of Qualifications) have not been included in this report but are available upon request. Pertinent documents are referred to in the text of this report, and a separate reference section has not been included. Reasonable attempts were made to obtain information within the scope and time constraints set forth by the client; however, in some instances, information requested is not, or was not, received by the issuance date of the report. Information obtained for this ESA was received from several sources that we believe to be reliable; nonetheless, the authenticity or reliability of these sources cannot and is not warranted hereunder. This ESA was further limited by the following:

- Historical records were not available prior to 1941; however, the first available historical record from 1941 indicates that the majority of the site was undeveloped and that the remaining portions of the site were single-family residences and a school gym. Therefore, the absence of earlier records is not considered a significant data gap.
- Terracon was not able to access the closed off pool area and crawl space of the vacant gym on Parcel A nor the interior of the on-site equipment buildings on Parcel B. However, the operations are associated with the vacant gym and powerhouse and this is not considered a significant data gap.
- The majority of Parcel B and Parcel C were covered with dense vegetation and the ground surface could not be observed. However, based on review of historical aerial photographs, those portions of the site have been undeveloped land since at least 1941. Based on this information, this does not represent a significant data gap.

An evaluation of the significance of limitations and missing information with respect to our findings has been conducted, and where appropriate, significant data gaps are identified and discussed in the text of the report. However, it should be recognized that an evaluation of significant data gaps is based on the information available at the time of report issuance, and an evaluation of information received after the report issuance date may result in an alteration of our conclusions, recommendations, or opinions. We have no obligation to provide information obtained or discovered by us after the



issuance date of the report, or to perform any additional services, regardless of whether the information would affect any conclusions, recommendations, or opinions in the report. This disclaimer specifically applies to any information that has not been provided by the client.

This report represents our service to you as of the report date and constitutes our final document; its text may not be altered after final issuance. Findings in this report are based upon the site’s current utilization, information derived from the most recent reconnaissance and from other activities described herein; such information is subject to change. Certain indicators of the presence of hazardous substances, petroleum products or PFAS compounds may have been latent, inaccessible, unobservable, or not present during the most recent reconnaissance and may subsequently become observable (such as after site renovation or development). Further, these services are not to be construed as legal interpretation or advice.

**1.5 Reliance**

This ESA report is prepared for the exclusive use and reliance of GREE BN LLC. Use or reliance by any other party is prohibited without the written authorization of GREE BN LLC and Terracon Consultants, Inc. (Terracon).

Reliance on the ESA by the client and all authorized parties will be subject to the terms, conditions and limitations stated in the proposal, ESA report, and Terracon’s Agreement. The limitation of liability defined in the Agreement is the aggregate limit of Terracon’s liability to the client and all relying parties.

Continued viability of this report is subject to ASTM E2247-16 Section 4.6 and 4.8. If the ESA will be used by a different user (third party) than the user for whom the ESA was originally prepared, the third party must also satisfy the user’s responsibilities in Section 6 of ASTM E2247-16.

**1.6 Client Provided Information**

Prior to the site visit, Mr. Eli Miller, client’s representative, was asked to provide the following user questionnaire information as described in ASTM E2247-16 Section 6.

**Client Questionnaire Responses**

Client Questionnaire Item	Client Did Not Respond	Client’s Response	
		Yes	No
Specialized Knowledge or Experience that is material to a REC in connection with the site.			X
Actual Knowledge of Environmental Liens or Activity Use			X



Client Questionnaire Item	Client Did Not Respond	Client's Response	
		Yes	No
Limitations (AULs) that may encumber the site.			
Actual Knowledge of a Lower Purchase Price because contamination is known or believed to be present at the site.			X
Commonly Known or Reasonably Ascertainable Information that is material to a REC in connection with the site.			X
Obvious Indicators of Releases at the site.			X

Terracon’s consideration of the client provided information did not identify RECs. A copy of the questionnaire is included in Appendix C.

## 2.0 PHYSICAL SETTING

Physical Setting Information		Source
<b>Topography</b>		
Site Elevation	Site elevations ranges from approximately 58 to 637 feet above sea level.	USGS Topographic Map, Sumner, Washington Quadrangle, 1993 (Appendix A)
Topographic Gradient	Parcel B is sloping to the west and Parcel A is generally flat.	
Closest Surface Water	Tailrace, located approximately 200 feet west of the site.	
<b>Soil Characteristics</b>		
Soil Type	Alderwood gravelly sandy loam, Semiahmoo muck, Xerochrepts, and Shalcar muck	Pierce County, WA USDA-NRCS Web Soil Survey issued December 2023
Description	The majority of the site is Alderwood gravelly sandy loam which is derived from glacial drift and/or glacial outwash over dense glaciomarine deposits, is comprised of gravelly sandy loam and very gravelly sandy loam, and is well drained. The western portion of the site is Semiahoo muck which is derived from herbaceous organic material, comprised of muck and silty clay, and is very poorly	





Physical Setting Information		Source
	<p>drained. The western and north-central portion of the site is Xerochrepts which is derived from sandy and gravelly outwash and/or glacial till, comprised of gravelly sandy loam and very gravelly sandy loam, and is well drained. The northwestern portion of the site is Shalcar muck which is derived from organic material over alluvium, comprised of muck, mucky peat, silty clay, and fine sandy loam, and is very poorly drained.</p>	
Geology/Hydrogeology		
Formation	<p>Glacial drift, chiefly till (Qgt),                      Glacial drift, undifferentiated (Qg),                      Salmon Springs drift (Qss),                      Alluvium (Qa), and Artificial fill (af).</p>	
Description	<p>The eastern portion of the site is Glacial drift, chiefly till which is mainly compact, unoxidized till deposited by the Puget glacial lobe, but includes sand and gravel both within and on top of till. The central portion of the site is undifferentiated Glacial drift. The western ridge slope is Salmon Springs drift which is two deposits of oxidized sand and gravel of central Cascade and northern provenance, and till deposited by the Puget glacial lobe. The western portion of the site is alluvium which is chiefly sand and pebble to cobble gravel beneath modern flood plains. A small portion of the southwest portion of the site is undifferentiated artificial fill.</p>	<p>USGS, Surficial geology and geomorphology of the Lake Tapps quadrangle, Washington, Washington, Crandell, D.R., 1963</p>



Physical Setting Information		Source
Estimated Depth to First Occurrence of Groundwater	Estimated to be approximately 6 feet below ground surface (bgs), a soil boring located approximately 120 feet west of the site.	Washington State Department of Ecology (Ecology), Online Well Log Viewer, Well ID: 848505, November 2011
*Hydrogeologic Gradient	Not known - may be inferred to be parallel to topographic gradient (primarily to the west-southwest).	

\* The groundwater flow direction and the depth to shallow, unconfined groundwater, if present, would likely vary depending upon seasonal variations in rainfall and other hydrogeological features. Without the benefit of on-site groundwater monitoring wells surveyed to a datum, groundwater depth and flow direction beneath the site cannot be directly ascertained.

### 3.0 HISTORICAL USE INFORMATION

Terracon reviewed the following historical sources to develop a history of the previous uses of the site and surrounding area, in order to help identify RECs associated with past uses. Copies of selected historical documents are included in Appendix C.

#### 3.1 Historical Topographic Maps, Aerial Photographs, and Sanborn Maps

Readily available historical USGS topographic maps and selected historical aerial photographs (at approximately 10- to 15-year intervals) were reviewed to evaluate land development and obtain information concerning the history of development on and near the site. Reviewed historical topographic maps, aerial photographs, and Sanborn maps are summarized below.

Historical fire insurance maps produced by the Sanborn Map Company were requested from ERIS to evaluate past uses and relevant characteristics of the site and surrounding properties. Based upon inquiries to the above-listed Sanborn provider, Sanborn maps were not available for the site.

- Topographic map: Lake Tapps, Washington, published in **1942** and **1944** (1:24,000)
- Topographic map: Sumner, Washington, **1956, 1968, 1973, 1993, 2017,** and **2020** (1:62,500)
- Aerial photograph: ERIS, **1941, 1944, 1957, 1968, 1972, 1977, 1981, 1986, 1998, 2004, 2005, 2006, 2009, 2011, 2013, 2015, 2017, 2019, 2020, 2021,** and **2022**, 1"=1000'



### Historical Maps and Aerial Photographs

Direction	Description
Site	The majority of Parcel A is apparent agricultural land, with the existing building, playfield, and single-family residences. Several single-family residential buildings, associated outbuildings, and an unpaved roadway traversing north to south are present on Parcel B and a commercial building is present in the southwest portion of Parcel B and the remainder of Parcel B and Parcel C is undeveloped land (1941-1944); another existing commercial building is constructed on the southwest portion of Parcel B (1957); the existing substation parking area is developed on Parcel B, unpaved roads are visible throughout Parcel B (1968); the single-family residence near the existing building on Parcel A is moved (1972-1986); the northern portion of Parcel A is used for storage around the single-family residence with outbuildings, and the former playfields are used for storage (1998-2004); the single-family residence and outbuildings on Parcel A are removed and continued to be used for storage (2005); the small commercial building on the southwestern portion of Parcel B is removed, powerlines are constructed throughout Parcel B (2006); the other commercial building on the southwest portion of Parcel B is removed, the single-family residences and outbuildings on Parcel B are removed (2009-2017); the northern portion of Parcel A is regraded (2019-2022)
North	Undeveloped land, single-family residences, and a single-family residence and apparent agricultural land (1941-1957); the existing substation adjoining Parcel B is developed (1968-1998); the single-family residence north-adjoining Parcel A is removed and the existing buildings are constructed (2004-2022).
East	Undeveloped land (1941-1944); dirt road is visible, identified as a pipeline on the 1956 topographic map (1957); several other dirt roads are visible (1968-1998); the properties to the northeast of the site are graded (2004-2005); Lakeland Hills Way is constructed, the rest of the properties are undeveloped forested land (2009-2022).
South	Undeveloped land, Cottage Road East, and several structures and single-family residences (1941-1998); Several dirt roads are visible (2004-2005); The properties to the south of the site are graded (2006); the existing single-family residences are under construction to the southeast, and the southwest single-family residences are removed (2009); the existing single-family residences are constructed (2011-2022).
West	The Northern Pacific Railroad adjoins the western most site parcels with apparent <i>agricultural land</i> beyond. The existing White River Hydroelectric Power Plant is visible, with the tail race and several structures are visible to the west of Parcel B. E Valley Highway E is visible with undeveloped land and structures to the east of the highway (1941-1986); the property to the southwest of Parcel B is graded. The property beyond the railroad is converted to a golf course (1998); the property to the southwest of Parcel B is a storage lot (2004-2022).

The site and west-adjoining properties were formerly used as agricultural land. According to Ms. Robyn Honeysett, the Parcel A owner, rhubarb and corn were cultivated



on the Parcel A land. Residual pesticides are a concern for properties formerly utilized for agricultural use. However, historical structures (where pesticide mixing would be likely to occur) were not noted in the reviewed records. Furthermore, the property has since been redeveloped with the existing golf course and likely included removal of surficial organic soils due to structural concerns. Therefore, this historical usage is not considered a REC.

### 3.2 Historical City Directories

The Cole and Digital Business Directory directories used in this study were made available through ERIS (selected years reviewed: 1977-2022) and were reviewed at approximate five-year intervals, if readily available. Street listings were not available prior to 1977. Through review of historical aerial photographs (See Section 3.1), the southeast-adjointing properties were previously undeveloped land from at least 1941 to the early 2000s, prior to being developed with the existing single-family residences and in the late 2000s. Therefore, these residential listings were not reviewed. Additionally, the east-adjointing property addressed as 2212 Sumner Tapps Highway East was undeveloped land from at least 1941 to the present. Therefore, the address was not researched. The Parcel C site address, 1705 East Valley Highway East, is shared the site address with the north-adjointing property, which is occupied by a single-family residence. Furthermore, the south-adjointing property to Parcel B is also addressed as 2005 Cottage Road East. The current street addresses for Parcel A were identified as 1808, 1820, 1904, and 2008 East Valley Highway East; for Parcel B were identified as 2005 Cottage Road East, 2111 East Valley Highway East, and 2120 Lakeland Hills Way; and for Parcel C was identified as 1705 East Valley Highway East . The historical addresses for Parcel A were identified as 1700, 1702, 1705, and 1706 East Valley Highway East and the historical address for Parcel B was identified as 2118 Cottage Road East.

#### Historical City Directories

Direction	Description
Site	<p><b><u>Parcel A:</u></b></p> <p><b>1700 E Valley Highway E:</b> No listing (1977-2022).</p> <p><b>1702 E Valley Highway E:</b> No listing (1977-1995); Sandi’s Signs (2000-2003); No listing (2008-2022).</p> <p><b>1704 E Valley Highway E:</b> No listing (1977-2022).</p> <p><b>1706 E Valley Highway E:</b> No listing (1977-1980); R M Zinicola (1985); No Listing (1985-1990); K J Kiblinger (1985-2003); Jerry L Murray (1990); Kj Kiblinger (1995); Gorder's Nursery (2000); Starcraft Upholstery (2000-2003); Martin J McLaughlin (2008); No Listing (2012-2022).</p> <p><b>1808 E Valley Highway E:</b> Dieringer Middle School (1980); <u>Dieringer</u> Maintenance Adm (1980); Dsd Middle School (1985-1990); Barrier West (2000);</p>



Direction	Description
	<p>Petersen Brothers (2000-2003); No listing (2008-2022).</p> <p><b>1820 E Valley Highway E:</b> No listing (1977-1980); Private individuals (1985-1990); No listing (1995-2022).</p> <p><b>1904 E Valley Highway E:</b> No listing (1977-1985); Private individuals (1990); No Listing (1990); Private individuals (1995-2003); No listing (2008-2022).</p> <p><b>2008 E Valley Highway E:</b> No listing (1977-1980); Petersen Brothers (1985-2022); Barrier West (2003); <i>Aqua Jet Car Wash</i> (2008); Peterson Brothers (2008); Western Self Storage (2008); <i>Sumner Crane Sales &amp; Service</i> (2008-2012); Barrier West Llc (2008-2016); Peterson Brothers, Inc (2012); Dieringer Gym (2022); Petersen Brothers Inc (2022).</p> <p><b>Parcel B:</b></p> <p><b>2005 Cottage Rd E:</b> No listing (1977-2003); Sumner Arrow Transportation (2008); No listing (2012-2022).</p> <p><b>2118 Cottage Rd E:</b> No listing (1977-1985); Darana Galloway (1990); M E Galloway Jr (1990); No listing (1995-2008); Weidemans (2012); No listing (2016-2022).</p> <p><b>2111 E Valley Highway E:</b> No listing (1977); Puget Sound Power (1980); Puget Sound Power and Light (1985); Puget Power (1990); Puget Sound Energy Inc (2000-2003); White River Hydro Generating (2016); Cascade Water Alliance Sumner (2016-2022); Veolia North America Bu12130 (2022).</p> <p><b>2120 Lakeland Hills Way:</b> No listing (1977-2022).</p> <p><b>Parcel C:</b></p> <p><b>1705 East Valley Highway E:</b> No listing (1977-2022).</p>
North	<p><b>2005 Cottage Rd E:</b> No listing (1977-2003); Sumner Arrow Transportation (2008); No listing (2012-2022).</p> <p><b>1526 E Valley Hwy E:</b> No listing (1977); Mr Fiberglas Indus (1985-1990); No Listing (1995); Barcha Brothers (2000); No listing (2003-2022).</p> <p><b>1705 East Valley Highway E:</b> No listing (1977-1995); Private individuals (2000-2012); No listing (2016-2022).</p> <p><b>1721 E Valley Highway E:</b> No listing (1977-1985); Private individuals (1990-2012); No listing (2016-2022).</p> <p><b>1807 East Valley Hwy E:</b> No listing (1977); Private individuals (1980-1985); No Listing (1990); Private individual (2008); No Listing (2012-2022).</p> <p><b>1921 East Valley Hwy E:</b> No listing (1977-2003); Private individual (2008-2022).</p>
East	<p><b>1502 73rd St SE:</b> No listing (1977-2008); Private individuals (2012-2022).</p> <p><b>2212 Sumner Tapps Hwy E:</b> No listing (1977-2022).</p>
South	<p><b>2005 Cottage Rd E:</b> No listing (1977-2003); Arrow Transportation (2008); No listing (2012-2022).</p> <p><b>16003-16225 22nd Street East:</b> No Listing (1977-2012); Private Individuals (2016-2020)</p>



Direction	Description
West	<p><b>2110 East Valley Hwy E:</b> No listing (1977-2000); Gorder's Nursery (2003-2008); K J Landscaping (2022).</p> <p><b>2111 East Valley Hwy E:</b> No listing (1977); Puget Sound Power (1980); Puget Sound Power and Light (1985); Puget Power (1990); Puget Sound Energy Inc (2000-2003); White River Hydro Generating (2016); Cascade Water Alliance Sumner (2016-2022); Veolia North America Bu12130 (2022).</p>

The site address 2008 East Valley Highway East was listed as Aqua Jet Car Wash in 2008 and Sumner Crane Sales and Service in 2008 to 2012. These facilities are likely associated with the Peterson Bros, Inc. facility that operates on select parent parcels of Parcel A. The businesses are not listed in the environmental regulatory report on databases associated with a release (Confirmed and Suspected Contaminated Sites List [CSCSL], Hazardous Site Listing [HSL]) and were listed in the city directories for short durations. Therefore, they are not considered RECs.

### 3.3 Site Ownership

Based on a review of information obtained from the Pierce County assessor’s records, the current site owners for Parcel A are Dieringer School LLC, Dieringer Shop & Yard LLC, and Western Self Storage LLC; the current site owners for Parcel B are Cascade Water Alliance and Puget Sound Energy/Electric; and the current site owner for Parcel C is a private individual. In addition, previous owners identified included private individuals and various LLCs.

### 3.4 Historical Tax Assessor Information

Pierce County Assessor provided property cards, dated 2023, for each site parcel that identified the size, improvements, and value of the land and a tract map showing combined parcels with no date. Terracon also reviewed online assessor records which noted that the existing gym building on Parcel A, addressed as 1808 East Valley Highway East, was constructed in 1955; however, based on information provided by Ms. Robyn Honeysett, the Parcel A owner, the building was constructed in 1928. Additionally, the existing pump shelter for the inactive pump on Parcel A was constructed in 2005.

There were two single-family residences and associated out buildings located along Cottage Road East on Parcel B, which were addressed as 2005 and 2118 Cottage Road East and constructed in 1921 and 1912, respectively. The buildings were demolished in the early 2000s. Furthermore, The three existing equipment buildings located centrally on Parcel B were constructed in 1955 and 1988. RECs were not identified with the reviewed documents.



### 3.5 Title Search

At the direction of the client, a title search was not included as part of the scope of services. Unless notified otherwise, we assume that the client is evaluating this information outside the scope of this report.

### 3.6 Environmental Liens and Activity and Use Limitations

Environmental lien and activity and use limitation (AUL) records recorded against the site were not provided by the client. At the direction of the client, performance of a review of these records was not included as part of the scope of services and unless notified otherwise, we assume that the client is evaluating this information outside the scope of this report

However, the ERIS regulatory database report included a review of both Federal and State Engineering Control (EC) and Institutional Control (IC) databases. Based on a review of the database report, the site was not listed on the EC or IC databases. Please note that in addition to these federal and state listings, AULs can be recorded at the county and municipal level that may not be listed in the regulatory database report.

### 3.7 Interviews Regarding Current and Historical Site Uses

The following individuals were interviewed regarding the current and historical use of the site.

#### Interviews

Interviewer	Name / Phone #	Title	Date/Time
Madeleine Hummer	Ms. Robyn Honeysett / 253-863-8136	Owner, Parcel A	January 12, 2024 / 11:00 am
	Mr. Chris Paulucci / 425-453-0934	Finance and Administration Manager, Parcel B	January 17, 2024 / 2:30 pm
	Mr. Darrin Ballenger / 425-428-3158	Owner, Parcel C	January 17, 2024 / 2:30 pm

Terracon interviewed Ms. Robyn Honeysett owner of Parcel A. She has been familiar with the Peterson Bros, Inc. parcels since 1995 and the Western Self Storage parcels since they were purchased in 2000. Ms. Robyn noted that the on-site gym was constructed in 1928 and operated as the Dieringer School from 1928 to 1990. The gym building has a court, stage, closed off swimming pool and crawl space, and gutted locker rooms. She was not aware of the history of any current or former underground or aboveground storage tanks on the site parcels nor usage of heating oil. Ms. Honeysett was not aware of any pending or threatened environmental litigation, past environmental litigation,



notices of possible violations of environmental laws, notices of possible liability, or notices of potential concerns.

Terracon interviewed Mr. Chris Paulucci, Finance and Administration Manager for Cascade Water Alliance which owns the majority of Parcel B. Mr. Paulucci was not aware of the history of the site or any current or former underground or aboveground storage tanks. He indicated that Cascade Water Alliance purchased some of Parcel B in 2009 from Puget Sound Energy (PSE). Mr. Paulucci was not aware of any pending or threatened environmental litigation, past environmental litigation, notices of possible violations of environmental laws, notices of possible liability, or notices of potential concerns.

Terracon interviewed Mr. Darrin Ballenger owner of Parcel C, who has been the property owner since 2019. He noted that the parcel had been undeveloped land and no previous structures, heating oil, underground or aboveground storage tanks, or disposal of hazardous materials had occurred at the parcel. Mr. Ballenger was not aware of any pending or threatened environmental litigation, past environmental litigation, notices of possible violations of environmental laws, notices of possible liability, or notices of potential concerns.

### 3.8 Prior Report Review

Terracon requested the client provide any previous environmental reports they are aware of for the site. Previous reports were provided by the client to Terracon for review.

The Riley Group, Inc. (RGI) completed a Phase I ESA, dated October 28, 2011, for the parcels owned and operated by Peterson Bros, Inc. (Pierce County Parcel Nos. 9520000-152, -143, -121, and -101), which include several entire parent parcels of Parcel A. RGI noted that the gym was "currently and historically heated by natural gas" and the owner at the time, Mr. Gary Peterson, provided RGI documents regarding the former natural gas use at Parcel A. However, those documents were not appended in the report nor provided to Terracon for review. At the time of the 2011 Phase I ESA, the Peterson Bros, Inc. was listed on the environmental regulatory database for underground storage tank (UST), Leaking UST (LUST), Independent Cleanup Report (ICR) associated with a release from former USTs during replacement. The former USTs were located approximately 100 feet west of the southern portion of Parcel A. RGI identified RECs associated with the site they were investigating, which included features that are not located on Parcel A. The RECs included concrete drains in an off-site building, waste oil piping, the punch auger truck parking area, the southern septic system, and former on-site USTs. RGI recommended that further investigation be completed in association with the noted RECs. A copy of the report is included in Appendix C.





Given Terracon’s review of RGI’s 2011 Phase I ESA, the RECs identified which include the concrete drains in an off-site building, waste oil piping, the punch auger truck parking area, and the southern septic system are not considered a concern for the site Terracon is assessing given the distance from Parcel A and the west-southwest groundwater flow. Therefore, those features are not considered RECs.

The location of the former USTs, approximately 100 feet west of the southern portion of Parcel A, and the associated database listing for the facility are discussed further in Section 4.1.

## 4.0 RECORDS REVIEW

Regulatory database information was provided by ERIS, a contract information services company in a report dated December 2023. The purpose of the records review was to identify RECs in connection with the site. Information in this section is subject to the accuracy of the data provided by the information services company and the date at which the information is updated. The scope herein did not include confirmation of facilities listed as "unmappable" by regulatory databases.

In some of the following subsections, the words up-gradient, cross-gradient, and down-gradient refer to the topographic gradient in relation to the site. As stated previously, the groundwater flow direction and the depth to shallow groundwater, if present, would likely vary depending upon seasonal variations in rainfall and the depth to the soil/bedrock interface. Without the benefit of on-site groundwater monitoring wells surveyed to a datum, groundwater depth and flow direction beneath the site cannot be directly ascertained.

### 4.1 Federal and State/Tribal Databases

Listed below are the facility listings identified on federal and state/tribal databases within the ASTM-required search distances from the approximate site boundaries. Database definition, descriptions, and the database search report are included in Appendix D.

#### Federal Databases

Database	Description	Distance (miles)	Listings
NPL	National Priorities List	1	0
SEMS	Superfund Enterprise Management System List	0.5	0
SEMS ARCHIVE	Superfund Enterprise Management System Archived Site Inventory	0.5	0



Database	Description	Distance (miles)	Listings
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System	0.5	0
CERCLIS NFRAP	CERCLIS – No Further Remedial Action Planned	0.5	0
FED BROWNFIELDS	The Assessment, Cleanup and Redevelopment Exchange System (ACRES) Brownfield Database	0.5	0
RCRA CORRACTS	Resource Conservation and Recovery Act (RCRA) Corrective Action Facilities	1.0	0
RCRA TSD	RCRA Non-CORRACTS TSD Facilities	0.5	0
RCRA LQG	Resource Conservation & Recovery Act – Large Quantity Generator	Site and Adjoining Properties	0
RCRA SQG	RCRA – Small Quantity Generator	Site and Adjoining Properties	0
RCRA Non Gen	RCRA Non Generators	Site and Adjoining Properties	3
FINDS/FRS	Facility Registry Service/Facility Index	Site	3

**State/Tribal Databases**

Database	Description	Distance (miles)	Listings
HSL	Hazardous Sites List	1	1
CSCSL	Confirmed and Suspected Contaminated Sites List	0.5	4
CSCSL NFA	CSCSL No Further Action Sites	0.5	2
SWF/LF	Solid Waste Facility Database	0.5	2
TP HIST LF	Tacoma-Pierce County Closed Landfill Survey	0.5	2
LUST	Leaking Underground Storage Tanks	0.5	3
UST	Underground Storage Tanks	Site and Adjoining Properties	2
INST	Environmental Covenants Institutional Controls	Site	0
VCP	Voluntary Cleanup Program Sites	0.5	1
BROWNFIELD	Brownfield Sites	0.5	0



Database	Description	Distance (miles)	Listings
ALLSITES	Facility/Site Identification System	Site	5
ERTS	Environmental Report Tracking System	Site	2
SPILLS	Spills and/or Releases	Site	2
ICR	Independent Cleanup Report	0.5	5
TIER 2	Storage of Hazardous Chemicals or Materials	Site	2

In addition to the above ASTM-required listings, Terracon reviewed other federal, state, local, and proprietary databases provided by the database firm. A list of the additional reviewed databases is included in the regulatory database report in Appendix D.

The following table summarizes the site-specific information found in the database and/or gathered by this office for sites within the ASTM search distances that have been deemed by the Environmental Professional to have the potential to impact the subject property based on type of facility, distance, and anticipated gradient relative to the site. Facilities are listed in order of proximity to the site. Additional discussion for selected facilities follows the summary table.

**Listed Facilities**

Facility Name and Location	Estimated Distance / Direction/Gradient	Database Listings	Findings Summary
Port City Express Inc 1700 E Valley Hwy E	Site	ALL SITES, FINDS/FRS, RCRA NON GEN	Not a REC, discussed further below.
Kiblinger 1706 E Valley Hwy E		TP HIST LF, SWF/LF	REC, discussed further below.
Petersen Brothers 2008 E Valley Hwy E		ALL SITES, FINDS/FRS, RCRA NON GEN, UST, LUST, CSECEL, ICR, ERTS	Not a REC, discussed further below.
PSE White River Generating Station 2111 E Valley Hwy E		FINDS/FRS, ICR, RCRA NON GEN, SPILLS, ERTS, UST, LUST, CSCSL, ICR	REC, discussed further below.
PSE White River Transmission Substation 2120 Lakeland Hills Way		North-adjointing / cross-gradient	CSCSL, ICR, TIER 2



Facility Name and Location	Estimated Distance / Direction/Gradient	Database Listings	Findings Summary
North Tacoma Meter Station NW Pipeline 15209 24Th St E	Approximately 240 feet / Southwest / cross-gradient	CSCSL NFA, ICR, VCP	Not a REC, based on distance, the impacted media being only soil, and the hydrogeologic cross-gradient position relative to the site.

Port City Express Inc

The site was listed as Port City Express Inc, addressed as 1700 East Valley Highway East, formerly located on the northern portion of Parcel A, and is listed on the Facility/Site Identification System (ALL SITES), Facility Registry Service/Facility Index (FINDS/FRS), and Resource Conservation and Recovery Act Non Generators (RCRA NON GEN) databases. According to the environmental regulatory report, the site was listed on the ALL SITES and FINDS/FRS for being a RCRA NON GEN facility. The site was not a generator in 1995 and 1999 and violations or notices of noncompliance were not noted. Based on the nature of the listing, the site is not considered a REC.

Kiblinger

The site was listed as Kiblinger, addressed as 1706 East Valley Highway and is listed on the Tacoma-Pierce County Closed Landfill Survey (TP HIST LF) and Solid Waste Facility Database (SWF/LF) databases. The site includes historical addresses 1702 and 1704 East Valley Highway East and the site is associated with Pierce County Parcel Nos. 9520000-168, 9520000-173, and 9520000-174, which are currently unaddressed and associated with the three northern most parcels on Parcel A. According to the environmental regulatory report, the site operated as a historical landfill and was opened April 1988. Tacoma Pierce County Health Department (TPCHD) provided Terracon with documents regarding the Kiblinger landfill. The documents include photos from 1989, a Closed Landfill/Dumpsite Report that is not dated, correspondence from the site owner and TPCHD, and an Application for Disposal Site Permit dated April 1988. A sketch map dated July 18, 1989 depicts the location of raw garbage on the southwestern portion of the site and lawn mowers, engines, refrigerators, and car bodies on the northeast portion of the site. Another sketch map dated July 26, 1989 depicts the site with the locations of the sixteen test pits and the "edge of fill" on the western portion of the site. Grading and filling notes from January 1989 indicate that backfill was used and considered clean material. A letter from TPCHD dated July 27, 1989, noted that sixteen test holes were excavated throughout the site to determine the extent of solid waste fill at the site. Broken concrete, sheetrock, and roofing materials was observed in some of the test pits and the rest of the test pits observed fill as "clean dirt." It was noted that the previous owner, Mr. Kiblinger would not continue to accept solid waste including concrete and asphalt. The photos provided showed concrete and asphalt debris,



household wares and plastics, various metals, and a cluster of 55-gallon drums with unknown contents. Given the unknown source of the material dumped at the site and the absence of analytical results, there is a potential that an undocumented release from the dumped materials has occurred and impacted the subsurface. Therefore, the historical landfill is considered a REC.

#### Petersen Brothers

The site was listed as Petersen Brothers, addressed as 2008 East Valley Highway East and is listed on the ALL SITES, FINDS/FRS, RCRA NON GEN, UST, LUST, CSCSL, Independent Cleanup Report (ICR), and Environmental Report Tracking System (ERTS) databases. These database listings are associated with the portions of the parent parcels of Parcel A that Terracon is not assessing. According to the environmental regulatory report, the ALL SITES and FINDS/FRS are associated with the RCRA NON GEN, UST, and LUST, listings. The site was a small quantity generator (SQG) in 1993, 2003, 2005, and 2006, a very small quantity generator (VSQG) from 1996 to 2006. Hazardous waste generated at the site was not listed in the environmental data base report. The ERTS listing was for potential dripping from auger trucks; however, it was noted that the dripping was from the hydraulic equipment and any spills were cleaned up and the area was to be paved. The UST listing is for two diesel USTs, a gasoline UST, and a waste oil UST that were removed and replaced with the existing two diesel USTs, a gasoline UST, and waste oil UST in 1999. The location of the USTs are approximately 100 feet west of the southern portion of Parcel A. Terracon reviewed a UST Site Assessment Report, dated July 26, 1999, conducted by Environmental Management Services, Inc. which noted that during replacement of the former USTs, confirmation soil samples were collected from the sidewalls of the excavations and were analyzed for gasoline- and diesel-range total petroleum hydrocarbons (TPH), benzene, toluene, ethylbenzene, and total xylenes (BTEX). Concentrations of gasoline- and/or diesel-range TPH were detected above MTCA Method A Soil cleanup levels in three soil samples. Terracon also reviewed a Preliminary Phase II Subsurface Investigation report, dated November 23, 2011, conducted by RGI. As part of the investigation, RGI advanced three soil borings in the vicinity of the former UST excavations near the locations of the impacted confirmation soil samples. Soil and groundwater samples were collected from the borings and concentrations of gasoline- and/or diesel-range TPH were not detected above MTCA Method A cleanup levels. Given the absence of soil and groundwater impacts in the vicinity of the former USTs, the approximate 25 years since UST removal which likely promoted natural attenuation of impacts, and the inferred west-southwest groundwater gradient, it does not appear that a release from the former USTs have impacted the site. Therefore, the site is not considered a REC.

#### PSE White River Generating Station

The site was listed as PSE White River Generating Station, addressed as 2111 East Valley Highway East (Pierce County Parcel No. 9520000-071), and was listed on the FINDS/FRS, ICR, RCRA NON GEN, CSCSL, LUST, Spills and/or Releases (SPILLS), ERTS,



and UST databases. Ecology provided Terracon with documents associated with remedial activities conducted at the site. According to a Site Assessment Report for the Underground Storage Tank Removal, dated December 1, 1995, completed by Golder Associates, one 500-gallon diesel UST and one 1,000-gallon gasoline UST associated with the northwest-adjointing White River Generating Station were located along East Valley Highway East on Parcel B beneath a former concrete pump island. The USTs were reportedly installed in 1987. However, according to GeoEngineers Environmental Site Characterization and Cleanup Action Report, dated January 28, 2008, the former USTs were both 500-gallons and were located beneath a former garage. Terracon infers that GeoEngineers had incorrect information regarding the sizes and location of the USTs and Terracon will therefore be referring to the 1995 Site Assessment Report for details of the former gasoline and diesel USTs, which are discussed further below.

In addition, GeoEngineers also identified a third former 500-gallon closed in-place UST containing diesel or gasoline that was reportedly filled with concrete in the 1980s. A 30-Day Notice Report, dated December 14, 2005, was submitted to remove the UST at the time of GeoEngineers proposed remedial excavation. In a site plan completed by GeoEngineers, the former UST is depicted in the former garage. However, at the time of the remedial excavation, USTs were not encountered. It appears that GeoEngineers had incorrect information regarding this former UST, which was most likely removed in the 1980s rather than closed in-place and likely contained waste oil associated with maintenance activities in the garage. Based on the absence of removal documentation and given that groundwater samples were not collected down-gradient of the former UST during GeoEngineers Groundwater Compliance Monitoring Summary Report, dated May 8, 2008, there is the potential that residual groundwater impacts remain in the subsurface in uninvestigated areas of the site. Therefore, the former UST is considered a REC.

According to the 1995 Site Assessment Report, in October 1995, the 1,000-gallon gasoline and 500-gallon diesel USTs were removed from the site. Confirmation soil and groundwater samples were collected and analyzed for TPH and BTEX. Impacts were not identified in soil at concentrations exceeding MTCA Method A cleanup levels. However, gasoline-range TPH and BTEX were identified in the initial groundwater sample from the excavation at concentrations exceeding their respective MTCA Method A cleanup levels. The excavation was pumped dry and an additional groundwater sample was collected which was not identified at concentrations exceeding MTCA Method A cleanup levels. Following this, Ecology issued a letter, dated March 22, 2004, stating that the release of petroleum products identified at the time of the UST removal no longer poses a threat to human health or the environment and the site was listed as 'Reported Cleaned Up'. It should be noted that the site was not given a No Further Action (NFA) determination because it was not enrolled in Ecology's Voluntary Cleanup Program (VCP). Additionally, regulatory oversight in 2004 was considerably less strict than current regulatory standards of 2022. Furthermore, Ecology only reviewed the 1995 Site Assessment



Report and if they had current information, they most likely would not have issued the site as cleaned up. During GeoEngineers 2008 Cleanup Action Report, approximately 300 cubic yards of contaminated soil were removed from the former gasoline and diesel UST area to a maximum depth of 6 feet bgs. Confirmation soil samples were collected and analyzed for gasoline-, diesel- and oil-range TPH, BTEX, polycyclic aromatic hydrocarbons (PAHs), lead and arsenic. Analytical results were not identified at concentrations exceeding their respective MTCA Method A cleanup levels at the final limits of the excavation. However, GeoEngineers did not collect soil samples in the immediate vicinity of the former USTs and the excavation was limited to 6 feet bgs. Based on this information, the site has not been adequately assessed and there is the potential that residual impacts remain in the subsurface of the site. Furthermore, the location of the groundwater monitoring well installed for the 2008 Groundwater Compliance Monitoring events is not appropriately placed in relation to the actual location of the former USTs and groundwater impacts may be present in the subsurface of the site. Therefore, the former gasoline and diesel USTs are considered a REC.

At the time of the 2008 Cleanup Action Report, a 50-gallon heating oil UST was encountered during the remedial excavation along the northern portion of the former carpenter building. Approximately 100 cubic yards of contaminated soil was removed from the heating oil UST excavation and confirmation soil samples were collected and analyzed for diesel- and oil-range TPH, BTEX, PAHs, polychlorinated biphenyls (PCBs), arsenic and lead. Analytical results were not identified at concentrations exceeding their respective MTCA Method A cleanup levels at the final limits of the excavation. However, based on the 2008 Groundwater Compliance Monitoring Report, groundwater was not sampled in the immediate vicinity or down-gradient of the heating oil UST. There is the potential that a release associated with this feature has impacted groundwater and residual impacts remain in the subsurface of the site. Therefore, the former heating oil UST is considered a REC.

Approximately 1,800 cubic yards of metal-contaminated soil, assumed to be associated with former sandblasting operations, were excavated from the site. Confirmation soil samples were collected and analyzed for arsenic and lead. In addition, some samples were also analyzed for TPH, volatile organic compounds (VOCs), PCBs and/or PAHs to evaluate potential impacts related to a septic tank and drain field. None of the analytes were detected at concentrations exceeding their respective MTCA Method A cleanup levels. However, based on GeoEngineers analytical data and figures depicting the remedial excavation in the 2008 Cleanup Action Report, there are several areas throughout the site where confirmation samples were identified above cleanup levels and the area was 'over excavated' and a final confirmation sample was not collected. Given this information and based on our experience with similar excavation performed at facilities with area-wide impacts, there is the potential that residual soil impacts remain in various areas throughout the site. Therefore, the potential for residual impacted soil to remain throughout the site is considered a REC.



Groundwater was encountered in the excavation at depths ranging from 2 to 3 feet bgs. Approximately 271,000 gallons of groundwater was removed from the excavations and disposed of off-site. According to the 2008 Groundwater Compliance Monitoring Summary Report, groundwater was collected from four monitoring wells for four consecutive quarters and was analyzed for gasoline-, diesel- and oil-range TPH, BTEX, methyl tert-butyl ether (MTBE), 1,2-dibromoethane (EDC), 1,2-dichloroethane (EDB), PAHs, PCBs and total and dissolved arsenic and lead. Analytical results were not identified at concentrations exceeding their respective MTCA Method A cleanup levels.

Based on the four quarters of groundwater monitoring and the remedial activities conducted at the site, GeoEngineers did not recommend further investigation. However, Terracon does not concur and identifies the potential for residual soil and/or groundwater associated with area-wide metal impacts, the former gasoline and diesel USTs, the former UST in the former garage and the former heating oil UST as RECs.

PSE White River Transmission Station

The north-adjoining property was identified on the CSCSL, ICR, and TIER 2 databases. According to the regulatory report, a release of mineral oil associated with the substation was identified in soil and suspected in groundwater in 2009. Terracon reviewed records provided by Ecology which noted that the release was located within the substation compound, at least 200 feet away from Parcel B, and associated with a transformer. The spill was cleaned up and confirmation soil samples were collected from the shallow excavated area. Based on distance of the nearest transformer equipment to the site (approximately 200 feet), it does not appear likely that a release in associated with this facility would have impacted the site. Therefore, this facility is not considered a REC.

The remaining facilities listed in the database report do not appear to represent RECs to the site at this time based upon regulatory status, apparent topographic gradient, and/or distance from the site.

Unmapped facilities are those that do not contain sufficient address or location information to evaluate the facility listing locations relative to the site. The report listed 19 facilities in the unmapped section. Determining the location of unmapped facilities is beyond the scope of this assessment; however, two of those facilities were identified as the site or adjacent properties. They are included in the table above. The remaining facilities are listed in the database report in Appendix D.

**4.2 Local Agency Inquiries**

Agency Contacted/ Contact Method	Response
TPCHD / online	A representative with TPCHD provided documents pertaining to the former Kiblinger Landfill, formerly location on Parcel A, which are discussed further in Section 4.1.





Agency Contacted/ Contact Method	Response
	<p>TPCHD also provided records including decommissioning certifications for the pumping of the septic tanks at 2005 and 2118 Cottage Road East, dated November 17, 2008, located on Parcel B. Septic system cards for Parcel B Site Parcel 0520071-007 for an equipment building updated July 2019, and Parcel B Site Parcel 0520072-004 for a former single-family residence addressed as 2005 Cottage Road East, updated October 2011.</p>
<p>East Pierce Fire and Rescue / online</p>	<p>A representative with the East Pierce Fire and Rescue provided Terracon with an incident report for August 19, 2023, for a felled tree in front of Parcel A site address 2008 East Valley Highway East. The reviewed documents are included in Appendix C.</p>
<p>City of Sumner Building Department / online</p>	<p>A representative with the City of Sumner Building Department provided Terracon with documents associated with the former Kilbinger landfill, formerly located on Parcel A, discussed further in Section 4.1. Additionally, documents include information related to structures located on the northeastern portion of Parcel A. The structures were constructed around 1976. Demolition of a duplex addressed as 1706 East Valley Highway East (Site Parcel No. 9520000-174), a mobile home addressed as 1704 East Valley Highway East (Site Parcel No. 9520000-173), and a shop addressed as 1702 East Valley Highway East (Site Parcel No. 9520000-168) for February 2005. While each structure was associated with a different address and parcel number, they were all located on Site Parcel No. 9520000-168. Each structure was connected to a separate septic system and the existing domestic water well located on the 9520000-168 parcel was capped. The septic tanks were pumped on January 13, 2005, for abandonment. An Asbestos Good Faith Survey was completed for the structures prior to demolition and disposed of off-site. The site parcels were redeveloped into the existing gravel lot in 2005. RECs were not identified with the reviewed documents.</p> <p>The City of Sumner also provided paperwork associated with the demolition of a single-family residence addressed as 2005 Cottage Road East dated December 2008, located on the northwest portion of Parcel B. In addition, a Septic Tank Decommissioning Certificate, dated November 26, 2008, identified that a former 1,000-gallon septic tank associated with the residence. Based on the nature of these records, the former septic tanks are not considered a REC. The reviewed documents are included in Appendix C.</p>
<p>Pierce County Planning and Public Works / online</p>	<p>A representative with Pierce County Planning and Public Works noted to Terracon that Parcel B Pierce County Parcel No. 0520071-007 is undeveloped land for utilities with two equipment buildings which were constructed in 1965 with no permits found in archives. Parcel B Pierce County Parcel No. 0520071-008 (2120 Lakeland Hills Way) is undeveloped land used for PSE utilities with one equipment building constructed in 1965, with no permits found in the archives for the building. Various permits associated with the Parcel B Site Parcels were identified in the Pierce County Online Permits database associated with the proposed construction of generation-intertie overhead electrical transmission line across the parcels. The reviewed documents are included in Appendix C. RECs were not identified during review of</p>



Agency Contacted/ Contact Method	Response
	the permits.
Ecology / online	A representative with Ecology provided Terracon with numerous documents associated with the site and adjoining properties. The pertinent documents are discussed further in Section 4.1.

### 4.3 Local Area Knowledge

The ARSACO Smelter operated from 1892 to 1986 on the border of North Tacoma and the town of Ruston. Air stack emissions dispersed arsenic, lead, and other heavy metals across a 1,000-square mile area, now called the Tacoma Smelter Plume (TSP). Based on a review of Ecology’s online TSP mapper, Parcel A is located in an area with possible arsenic in surficial soil at concentrations estimated to be below 20 parts per million (ppm), the current MTCA Method A cleanup level for arsenic in soil for unrestricted land use. Based on this information and the development of the site with the existing structures and improvements, smelter plume impacts are unlikely to be present at the site and do not represent a REC.

## 5.0 SITE RECONNAISSANCE

### 5.1 General Site Information

Information contained in this section is based on a visual reconnaissance conducted while walking through the site and the accessible interior areas of structures, if any, located on the site. The site and adjoining properties are depicted on the Site Diagram, which is included in Exhibit 2 of Appendix A. Photo documentation of the site at the time of the visual reconnaissance is provided in Appendix B. Credentials of the individuals planning and conducting the site visit are included in Appendix E.

#### General Site Information

Site Reconnaissance	
Field Personnel	Madeleine M. Hummer
Reconnaissance Date	January 12, 2024
Weather Conditions	Sunny, 20° F
Site Contact/Title	Robyn Honeysett / Parcel A Site Owner Darrin Ballenger / Parcel C Site Owner



Building Description				
Building Identification	Building Use	Approx. Construction Date	Number of Stories	Approx. Size (ft <sup>2</sup> )
<b>Parcel A</b>				
Vacant gym with attached former coal furnace	Vacant	1928	1	9,775
City of Sumner Well Pump House	Well Pump House	Unknown	1	300
<b>Parcel B</b>				
Cascade Water Alliance Equipment Building	Equipment	1988	1	2,420
Cascade Water Alliance Equipment Building	Equipment	1965	1	272
Cascade Water Alliance Equipment Building	Equipment	1965	1	224
Site Utilities				
Drinking Water	City of Sumner			
Wastewater	Septic system			
Electric	Puget Sound Energy (PSE)			
Natural Gas	PSE			

## 5.2 Areas of Interest

Due to the large size of Parcel A and the large size and forested nature of Parcel B, aerial photographs and topographic maps (Section 3.0) of the site were reviewed to evaluate areas of environmental interest. Areas of environmental interest are defined as, “an area or areas of the property with indications of activity that could have resulted in the presence of a recognized environmental condition, especially areas where hazardous substances or petroleum products may be used, handled, managed or stored or may have been used, handled, managed or stored in the past.” The following areas of environmental interest were identified and visited during the site reconnaissance:

Areas of Environmental Interest	Observations
Parcel A – Western Self Storage	The northern portion of Parcel A operates as a self-storage facility for boats, trailers, and RVs on a gravel lot. Staining or evidence of releases were not observed in the vicinity of the stored vehicles. However, the property is located on a former landfill, discussed further in Section 4.1.



Areas of Environmental Interest	Observations
Parcel A – Peterson Bros, Inc.	The majority of Parcel A operates as Peterson Bros, Inc., and utilizes the site as storage for equipment and supplies. RECs were not identified in this area during the site reconnaissance.
Parcel B – Cascade Water Alliance Equipment Buildings	Three equipment buildings owned and operated by Cascade Water Alliance were observed on Parcel B. RECs were not identified in this area during the site reconnaissance.

### 5.3 Overview of Current Site Occupants

Parcel A Pierce County Parcel Nos. 9520000-168, -173, and -174 are occupied by Western Self Storage, Parcel A Pierce County Parcel Nos. 9520000-101, -121, -143, and -152 are occupied by Petersen Bros Inc., Parcel B Pierce County Parcel No. 0520071008 is occupied by PSE, and the remaining site parcels are unoccupied, undeveloped vegetated and forested land.

### 5.4 Overview of Current Site Operations

Parcel A Pierce County Parcel Nos. 9520000-168, -173, and -174 operate as Western Self Storage that provides self-storage to private individuals. Parcel A Pierce County Parcel Nos. 9520000-101, -121, -143, and -152 operate as Petersen Bros Inc., a guardrail and concrete barrier construction fencing company. Parcel B Pierce County Parcel No. 0520071-008 operates as a PSE substation, and the remaining parcels of Parcel B and Parcel C are unoccupied undeveloped land.

### 5.5 Site Observations

The following table summarizes site observations and interviews. Affirmative responses (designated by an "X") are discussed in more detail following the table.

#### Site Characteristics

Category	Item or Feature	Observed or Identified
Site Operations, Processes, and Equipment	Emergency generators	
	Elevators	
	Air compressors	
	Hydraulic lifts	
	Dry cleaning	
	Photo processing	



Category	Item or Feature	Observed or Identified
	Ventilation hoods and/or incinerators	
	Waste treatment systems and/or water treatment systems	
	Heating and/or cooling systems	X
	Paint booths	
	Sub-grade mechanic pits	
	Wash-down areas or carwashes	
	Pesticide/herbicide production or storage	
	Printing operations	
	Metal finishing (electroplating, chrome plating, galvanizing, etc.)	
	Salvage operations	
	Oil, gas, or mineral production	
	Other processes or equipment	
Aboveground Chemical or Waste Storage	Aboveground storage tanks	
	Drums, barrels, and/or containers ≥ 5 gallons	
	MSDS or SDS	
Underground Chemical or Waste Storage, Drainage or Collection Systems	Underground storage tanks or ancillary UST equipment	
	Sumps, cisterns, French drains, catch basins, and/or dry wells	X
	Grease traps	
	Septic tanks and/or leach fields	
	Oil/water separators, clarifiers, sand traps, triple traps, interceptors	
	Pipeline markers	
Electrical Transformers/PCBs	Interior floor drains	
	Transformers and/or capacitors	X
Releases or Potential Releases	Other equipment	
	Stressed vegetation	
	Stained soil	
	Stained pavement or similar surface	
	Leachate and/or waste seeps	
	Trash, debris, and/or other waste materials	X



Category	Item or Feature	Observed or Identified
	Dumping or disposal areas	
	Construction/demolition debris and/or dumped fill dirt	X
	Surface water discoloration, odor, sheen, and/or free-floating product	
	Strong, pungent, or noxious odors	
	Exterior pipe discharges and/or other effluent discharges	
Other Notable Site Features	Surface water bodies	
	Quarries or pits	
	Wastewater lagoons	
	Wells	X

Site Operations, Processes, and Equipment

**Heating and/or cooling systems**

The on-site vacant gym building had natural gas-powered suspended heaters which were observed in the northern portion of the building. The heaters appeared to be in good condition; however, according to Ms. Robyn Honeysett, Parcel A owner, natural gas was shut off to the building in August 2023. The gym was historically heated by a coal burner which adjoins the gym building.

Underground Chemical or Waste Storage, Drainage or Collection Systems

**Sumps, cisterns, catch basins, and/or dry wells**

Catch basins were observed throughout the Parcel A parking lots during the site reconnaissance. The catch basins discharge to the tailrace. Staining and/or releases were/were not observed in the vicinity of catch basins during the site reconnaissance.

Electrical Transformers/PCBs

**Transformers and/or capacitors**

During Terracon’s site visit, one pad-mounted transformer, owned and serviced by PSE, was observed near the southern portion of the Parcel A vacant gym; however, no information with regard to polychlorinated biphenyl (PCB) content of the transformer fluids was observed. Transformers contain mineral oil which may contain minor amounts of PCB and could be considered “PCB contaminated” (PCB content of 50-500 ppm). PSE maintains responsibility for the transformer, and if the transformer was “PCB contaminated,” the utility company is not required to replace the transformer fluids until



a release is identified. However, no evidence of current or prior release was observed in the vicinity of the electrical equipment during the site reconnaissance. As a result, the transformer does not represent a REC.

Releases or Potential Releases

**Construction/demolition debris and/or dumped fill dirt**

The majority of Parcel A is occupied by Peterson Bros, Inc., which is a guardrail and concrete barrier construction fencing company, that stored metal barriers, fencing, concrete barriers, trucks, trailers, and signage. Staining or evidence of a release were not observed in the vicinity of the stored equipment.

Other Notable Site Features

**Wells**

Two domestic water wells were observed on the northwestern site parcels. The domestic water well on the northern most portion of Parcel A, located within a trailer, is inactive and was installed at an unknown time. Staining or evidence of a release was not observed in the vicinity of the well and pump house.

The domestic water well located on Parcel A to the west of the vacant gym is within a pumphouse that was gifted to the City of Sumner in the early 2000s, who now owns the pump house and has an access easement from East Valley Highway East to the pump house. The pump house was inaccessible at the time of the site reconnaissance. Staining or evidence of a release were not observed in the vicinity of the pump house.

**6.0 ADJOINING PROPERTY RECONNAISSANCE**

Visual observations of adjoining properties (from site boundaries) are summarized below.

**Adjoining Properties**

Direction	Description
North	Western Self Storage (1526 East Valley Highway), single-family residences (1705, 1721, 1807, and 1921 East Valley Highway East), and undeveloped parent parcels (2005 Cottage Road East & 2120 Lakeland Hills Way).
East	Lakeland Hills Way followed by undeveloped land (2212 Sumner Tapps Highway East).
South	Peterson Bros, Inc. parent parcel (no address), a single-family residential development (16003-16225 22nd Street East) and undeveloped land (2005 Cottage Road East).



Direction	Description
West	Cascade Water Alliance Powerhouse (2111 East Valley Highway East), undeveloped land, East Valley Highway East followed by a substation and commercial property (2110 East Valley Highway East), and Peterson Bros, Inc. parent parcels (1808, 1820, and 2008 East Valley Highway East), a railroad and undeveloped land.

RECs were not observed with the remaining adjoining properties.

## 7.0 ADDITIONAL SERVICES

Per the agreed scope of services specified in the proposal, additional services (asbestos sampling, lead-based paint sampling, wetlands evaluation, lead in drinking water testing, radon testing, vapor encroachment screening, etc.) were not conducted.

## 8.0 DECLARATION

I, Madeleine M. Hummer, declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in Section 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 site. I have developed and performed the All Appropriate Inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

---

Madeleine M. Hummer, L.G.  
 Senior Staff Geologist

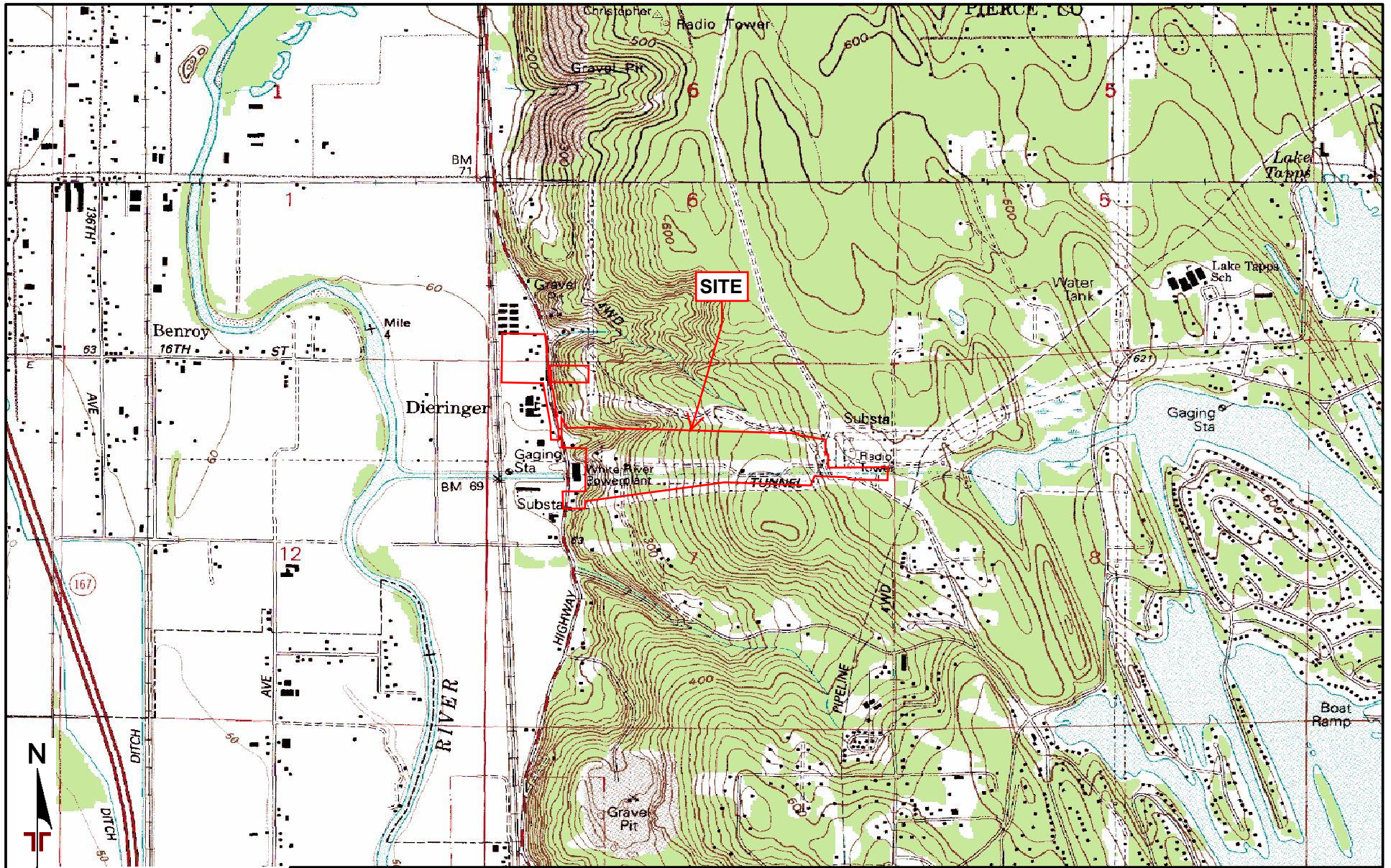


**APPENDIX A**

**EXHIBIT 1: TOPOGRAPHIC MAP**

**EXHIBIT 2: SITE DIAGRAM**

**EXHIBIT 3: SITE DIAGRAM  
WITH PARCEL INFORMATION**



TOPOGRAPHIC MAP IMAGE COURTESY OF THE U.S. GEOLOGICAL SURVEY QUADRANGLES INCLUDE: SUMNER, WA (1971)

DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

Project Manager: MMH	Project No. 81237631
Drawn by: MMH	Scale: 1"=2,000'
Checked by: MYW	File Name: Figures
Approved by: MYW	Date: Jan 2024

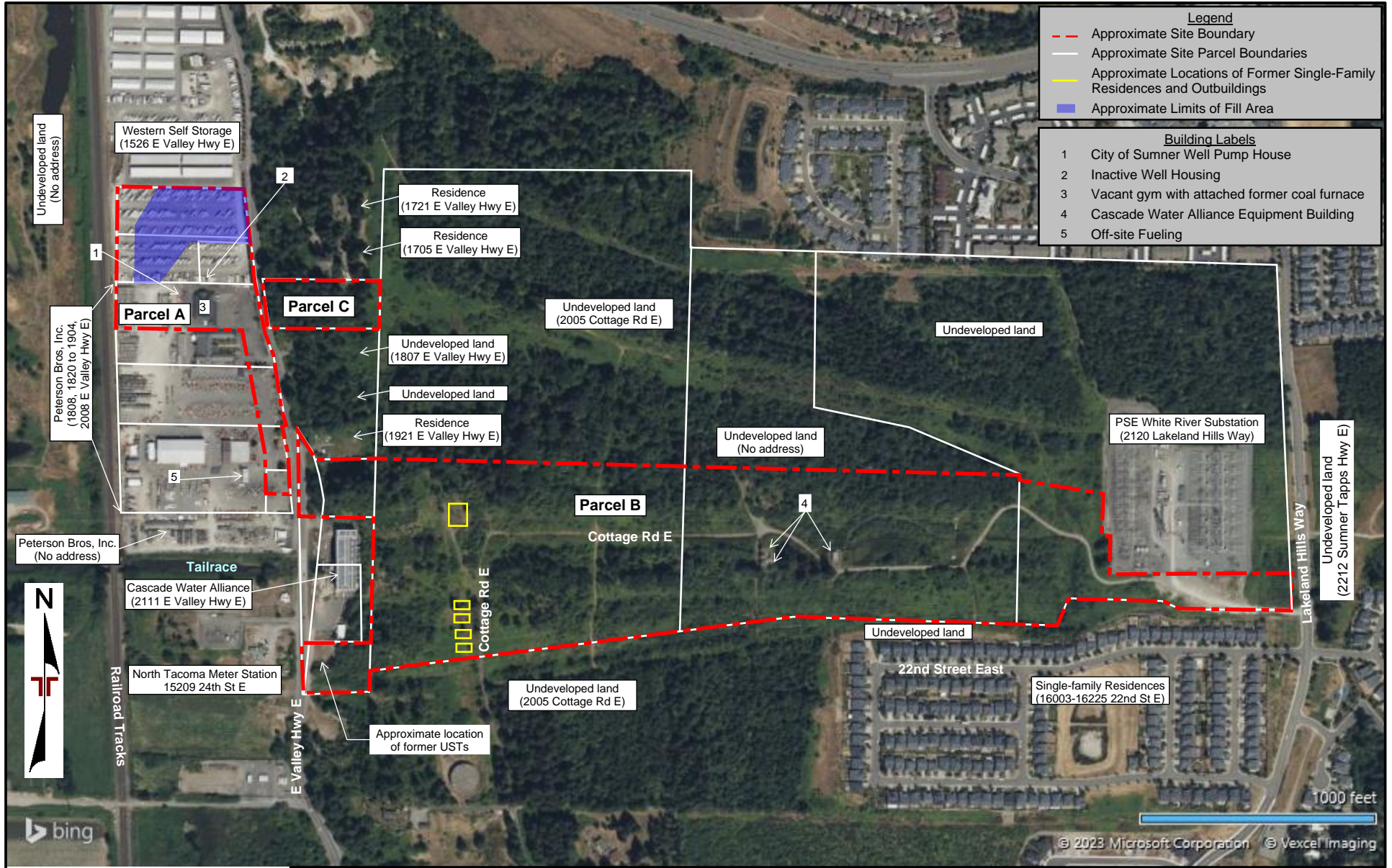


21905 64th Ave W, Ste 100  
Mountlake Terrace, WA 98043-2251

TOPOGRAPHIC MAP

Greenwater Storage  
2120 Lakeland Hills Way  
Sumner, WA

Exhibit
1



AERIAL PHOTOGRAPHY PROVIDED BY MICROSOFT BING MAPS

DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

Project Manager: MMH  
 Drawn by: MMH  
 Checked by: MYW  
 Approved by: MYW

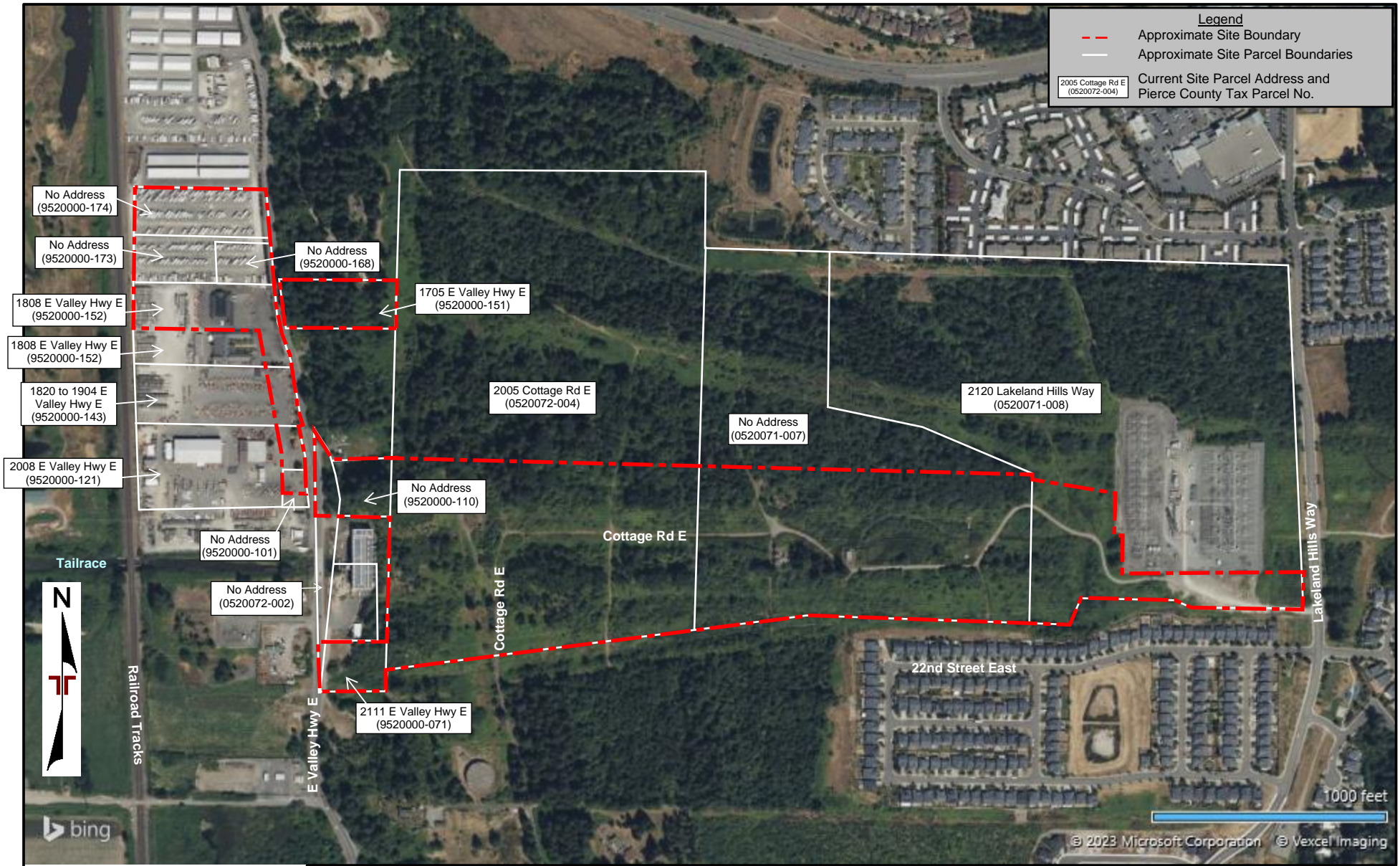
Project No. 81237631  
 Scale: AS SHOWN  
 File Name: Figures  
 Date: Jan 2024

21905 64th Ave W, Ste 100  
 Mountlake Terrace, WA 98043-2251

**SITE DIAGRAM**

**Greenwater Storage**  
 2120 Lakeland Hills Way  
 Sumner, WA

Exhibit  
**2**



AERIAL PHOTOGRAPHY PROVIDED BY MICROSOFT BING MAPS

DIAGRAM IS FOR GENERAL LOCATION ONLY, AND IS NOT INTENDED FOR CONSTRUCTION PURPOSES

Project Manager: MMH  
 Drawn by: MMH  
 Checked by: MYW  
 Approved by: MYW

Project No. 81237631  
 Scale: AS SHOWN  
 File Name: Figures  
 Date: Jan 2024

21905 64th Ave W, Ste 100  
 Mountlake Terrace, WA 98043-2251

**SITE DIAGRAM WITH PARCEL INFORMATION**

**Greenwater Storage**  
 2120 Lakeland Hills Way  
 Sumner, WA

Exhibit  
**3**

**APPENDIX B**  
**SITE PHOTOGRAPHS**



**Photo 1** Typical view of the northern portion of Parcel A, facing west.



**Photo 2** Typical view of the northern portion of Parcel A with the vacant gym building and attached former coal furnace and stack to the left, facing west-northwest from the east-central portion of Parcel A.



**Photo 3** Typical interior view of the vacant gym building on Parcel A.



**Photo 4** Typical interior view of the former coal furnace, attached to the south of the vacant gym.



**Photo 5** Typical view of the City of Sumner well pump house on Parcel A facing west.



**Photo 6** Typical view of the western portion of Parcel A facing south.



Project No. 81237631 | Sumner, Washington  
Date Photos Taken | January 12, 2024



**Photo 7** Typical view of the eastern portion of Parcel A facing north from the eastern portion of Parcel A.



**Photo 8** Typical view of the eastern portion of Parcel A facing south from the eastern portion of Parcel A.



**Photo 9** View of the southwestern portion of Parcel B, facing south from Parcel B.



**Photo 10** Typical view of the north-central portion of Parcel B, facing north, with undeveloped parent parcel beyond, facing north from Parcel B.



**Photo 11** Typical view of the western portion of Parcel B and Cottage Road E, facing west from the central portion of Parcel B.



**Photo 12** Typical view of a Cascade Water Alliance equipment building on Parcel B.

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**Photo 13** Typical view of a north-adjointing property to Parcel B (2111 E Valley Highway E), facing north from the southwest portion of Parcel B.



**Photo 14** View of the north-adjointing property to Parcel A (1526 E Valley Highway E), facing northeast from the northwest corner of Parcel A.



**Photo 15** View of the north-adjacent properties to Parcel C (1705 & 1721 E Valley Highway E), facing north from Parcel C.



**Photo 16** Typical view of E Valley Highway E followed by north-adjacent properties to Parcel B (1807 & 1921 E Valley Highway E), facing northwest from Parcel A.



**Photo 17** Typical view of the north-adjointing property to Parcel B (2120 Lakeland Hills Way), facing north from Parcel B.



**Photo 18** Typical view of Parcel B facing north with the north-adjointing properties to Parcel B beyond.



**Photo 19** Typical view of Lakeland Hills Way followed by the east-adjointing properties to Parcel B, facing northeast from the eastern most portion of Parcel B.



**Photo 20** Typical view of the south-adjointing Cottage Road East followed by the south-adjointing properties to Parcel B (2005 Cottage Rd E), facing south from Parcel B.



**Photo 21** View of the south-adjacent parent parcel to Parcel A, facing south from the southern-most portion of Parcel A.



**Photo 22** Typical view of the west-adjacent railroad followed by the west-adjacent property, which adjoins the northern most of Parcel A, facing northwest from Parcel A.



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**Photo 23** Typical view of the west-adjointing parent parcel (1808 E Valley Highway E), facing west from Parcel A.



**Photo 24** Typical view of the west-adjointing parent parcel (1820 to 1904 E Valley Highway E), facing west from Parcel A.

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Date Photos Taken | January 12, 2024



**Photo 25** Typical view of the west-adjointing parent parcel (2008 E Valley Highway E), facing west from Parcel A.



**Photo 26** Typical view of the west-adjointing parent parcel fueling (2008 E Valley Highway E), facing west from Parcel A.



**Photo 27** Typical view of the west-adjointing parent parcel (2008 E Valley Highway E), facing southwest from Parcel A.



**Photo 28** Typical view of E Valley Highway E followed by the west-adjointing property to Parcel B (2110 E Valley Highway E), facing west from the southwest portion of Parcel B.