

PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA)

December 13, 2023

Subject Property:

1799 Washington St (State ID: 22E29 01402)
aka 1795 Washington St
NE Portion of Former Stimson Lumber Mill Property - Parcel 2
Oregon City, OR 97045



Prepared for:

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This report has been prepared by Environmental Works, LLC, of Fairview, Oregon

By

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1.0 EXECUTIVE SUMMARY

Environmental Works (EW) performed a Phase I Environmental Site Assessment (ESA) for the “Mixed Use Downtown (MUD)” zoned Subject Property located at 1799 Washington Street in Oregon City, Clackamas County, Oregon (State Identification: 22E29 01402), herein referred to as the Subject Property. The location of the Subject Property is presented in Figure 1 and Figure 2.

Note the Subject Property was also identified as 1795 Washington Street, Oregon City, Oregon in numerous online maps, databases, and select environmental documents; and the address of the current occupants of the Subject Property (Clackamas Landscape Supply Inc) is 1795 Washington Street, Oregon City, OR.

The Subject Property was a part of the historic Stimson Lumber Mill site. The Stimson Lumber Mill site was historically separated into Parcel 1 (part of 1757 Washington St); and Parcel 2 (part of 1757 Washington St and all of 1799 Washington St). The approximate boundaries of the former historic Stimson Lumber Mill site, Parcel 1, Parcel 2 and the Subject Property is depicted in Figure 3.

The following Phase I ESA report was prepared for the owner and the owner representative of the Subject Property (City of Oregon City, and City of Oregon City | Department of Economic Development - Mr. James N. Graham, CEcD). This Phase I ESA was conducted in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) Standard Practices for Environmental Site Assessments: Phase I Environmental Site Assessment Process, E1527-13 and E1527-21, and the standard of “all appropriate inquiry” under the Oregon Revised Statutes (ORS) § 465.255(6), and 40 Code of Federal Regulations (CFR) Part 312 Standard Practices or All Appropriate Inquiries. Any exception to, or deletions from, this practice were described in Section 12.3 of this report.

This Phase I ESA was conducted for the purpose of identifying Recognized Environmental Conditions (RECs) that may impact the Subject Property to qualify for Landowner Liability Protections (LLPs) under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). RECs are defined as “(1) *the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of future release to the environment. A de minimis condition is not a recognized environmental condition.*”

1.1 Subject Property and Nearby Properties Descriptions

The Subject Property is an elongated generally triangular and irregularly shaped 6.83-acre parcel with a large sloped ramp type surface feature located near the northwest central side of the property. The boundaries of the Subject Property and nearby surrounding properties are presented on Figure 2 and Figure 4.

Subject Property Descriptions

Subject Property Name:	NE Portion of the Former Stimson Lumber Mill Property
Parcel Address:	1799 Washington St, Oregon City, Oregon 97045
Current Occupant Address:	1795 Washington St, Oregon City, Oregon 97045 <i>“Clackamas Landscape Supply”</i>
Historical Addresses:	- 1799 Washington St, Oregon City, Oregon 97045 - 1795 Washington St, Oregon City, Oregon 97045 (Former “Stimson Lumber Mill” Property)”
State Identification (ID) or Taxlot Number:	22E29 01402
Parcel Number:	01692779

Nearby Properties Descriptions

RELATIVE LOCATION	PARCEL ADDRESS	PARCEL LAND TYPE	PARCEL STATE ID
South	1726 Washington St <i>"End of the Oregon Trail Interpretive Center"</i>	"Mixed Use Downtown (MUD)"	22E29CA00500
Southwest	1757 Washington St <i>"Oregon City Station"</i>	"Mixed Use Downtown (MUD)"	22E29 01403
Northwest	Rail Tracks (Right-of-Way)	-	No Situs
North-Northeast	2001 Washington St <i>"Metro South Transfer Station"</i>	General Industrial	22E29 00904
Northeast	Access Road (Right-of-Way)	-	No Situs
East	Washington St (Right-of-Way) then	-	-
	1107 Abernathy Rd (aka 1101 17th St) <i>"Trails End Golf Center"</i> <i>Former "Rossman's Landfill"</i>	"Mixed Use Downtown (MUD)"	22E29 00902
Southeast	Washington St (Right-of-Way) then	-	-
	1810 Washington St Vacant Lot	"Mixed Use Downtown (MUD)"	22E29 00906
Southeast	Washington St (Right-of-Way) then	-	-
	1780 Washington St <i>"Stark Street Lawn & Garden Oregon City"</i>	"Mixed Use Downtown (MUD)"	22E2CA00400

The descriptions and details of the Subject Property and adjoining properties were generally derived from the City of Oregon City - OC WEBMAPS parcel property information database (<https://www.ocity.org/397/OC-WebMaps>), the Clackamas County - CMAP parcel property information database (<https://cmap.clackamas.us/maps>), the City of Portland - PortlandMaps parcel property information database (<https://www.portlandmaps.com>), select aerial photos, and a site reconnaissance.

Additional descriptions and details of the Subject Property and nearby properties are presented in Section 3.0 of this report.

1.2 Subject Property and Nearby Properties History

The Subject Property was currently observed to be occupied and operated as a commercial landscape supply distribution company identified as “Clackamas Landscape Supply, Inc”. Significant portions of the ground surface areas were used for the storage and display of commercial landscape supplies and materials (i.e. landscape rocks, gravel, sand, fill rock, mulch, etc.).

The Subject Property was historically the northeastern portion of the Former Stimson Lumber Mill Property.

A general summary of the historical uses of the Subject Property and nearby properties are presented below.

LOCATION	DESCRIPTION
Subject Property	<p>Mostly agricultural fields and a building structure at the northeastern end of the Subject Property (1936). Mostly agricultural and open fields (1948). Mostly open fields, a building structure on the southern end of the Subject Property, and some storage of materials on the central portion of the Subject Property (1952, 1955). More intensive usage and storage of materials on the central and southwestern portions of the Subject Property (1960). A large L-shaped building structure on the southern portion of the Subject Property, and intensive usage of the property as a lumber mill with stacked logs (1970, 1975, 1981). The large L-shaped building structure on the southern portion of the Subject Property appear to have been razed, the property appeared to be in the process of being cleared, and the lumber mill no longer appeared to be present (1994). The Subject Property appeared to have been cleared and grubbed, some portions of the cleared areas appeared to be used for the storage of materials, and the Former Lumber Mill no longer appeared to be present (2000). The Subject Property appeared to be occupied and operated as the current commercial landscape supply distribution company (2006, 2009, 2012, 2016, 2020).</p>
Northwest of Subject Property	<p>The area to the northwest of the Subject Property appeared to be mostly agricultural fields with two (2) generally parallel railroad tracks aligned north-northeast and south-southwest (1936, 1948, 1952, 1955). The excavation of Clackamette Cove appeared to had begun (1960). The excavation of Clackamette Cove appeared to had been completed, Highway 205 appeared to have begun construction (1970), and industrial and/or commercial buildings appeared to have been developed (1970, 1975, 1981, 1994, 2000, 2006, 2009, 2012, 2016). Multi-family residential units appeared to have been developed (2020).</p>

<p>North of Subject Property</p>	<p>The area to the north of the Subject Property appeared to be mostly agricultural fields with a railroad track aligned north-northeast and south-southwest, and some residences (1936, 1948, 1952, 1955, 1960). Highway 205 appeared to have begun construction (1970), and industrial and/or commercial development with stacked logs appeared to have begun (1970, 1975, 1981). The Metro South Transfer Station appeared to have been constructed (1994). Large stacks of logs appear to have been removed (1994). The area to the north appeared to be generally industrial and/or commercial (2000, 2006, 2009, 2012, 2016, 2020)</p>
<p>Northeast and East</p>	<p>The area to the northeast and east of the Subject Property appeared to be mostly agricultural fields with two (2) small ponds (1936, 1948, 1952, 1955, 1960). The area appeared to have been developed for some commercial, industrial, and/or landfill use (1970, 1975, 1981) The landfill appeared to have been covered (1994). The area appeared to have been re-developed for mostly commercial (including a golf center) and/or industrial uses (2000, 2006, 2009, 2012, 2016, 2020).</p>
<p>Southeast and South</p>	<p>The area to the southeast and south of the Subject Property appeared to include a large sports venue ("Kelley Field"), agricultural fields, commercial and/or industrial building structures, and residences (1936, 1948, 1952, 1955, 1960). More commercial and/or industrial buildings appeared to have been developments (1970, 1975, 1981, 1994, 2000, 2006, 2009, 2012, 2016, 2020).</p> <p>The End of the Oregon Trail Interpretive Center appeared to have been developed on the site of "Kelley Field" (2000).</p>

Southwest	The area to the southwest of the Subject Property appeared to include agricultural fields, commercial and/or industrial building structures, and residences (1936, 1948, 1952, 1955, 1960). More commercial and/or industrial buildings appeared to have been developments and residential buildings appeared to have been razed (1970, 1975, 1981, 1994, 2000, 2006, 2009, 2012, 2016, 2020).
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The location of the Subject Property is presented in Figure 1. The boundaries of the Subject Property, neighboring properties, and select property details are presented on Figure 2. The boundary of the Subject Property relative to the former boundary of the Former Stimson Lumber Mill property is presented in Figure 3. The locations and descriptions of the Subject Property and site features are presented on Figure 4, Figure 5, and Figure 6.

Additional descriptions and details of the Subject Property and nearby properties are presented in Section 7.0 of this report.

1.3 Site Reconnaissance and Records Review Findings

The site reconnaissance and records reviews did not identify evidence of:

- Water wells on the Subject Property;
- Disposal pits, ponds, lagoons, or surface impoundments on the Subject Property;
- Stressed vegetation on the Subject Property; and
- Environmental permits, notices or environmental liens for the Subject Property.

Site Reconnaissance

However, the site reconnaissance indicated:

- Select observed site features that were likely related to “de minimis” conditions on the Subject Property.
 - Maintenance Supply Shed with Petroleum Products;
 - Semi-Trailer with General Mechanical Work Shop;
 - Stormwater Catch-Basins potentially connected to UICs;
 - Stormwater Outfalls, drainage ditches, and buried culverts; and
 - A Pile of Crushed Asphalt Debris Material.

- The **adjoining rail road tracks right-of-way** (No Situs) property along the northwest boundary of the Subject Property was observed with large ballast rocks used as the base of the rail road tracks that may be a preferential migration pathway or transport conduit for surface and/or stormwater runoff.
- The adjoining “Metro South Transfer Station” property to the north-northeast was observed with a small pond.
- The adjoining gravel access road right-of-way (No Situs) property to the northeast was observed with flush-mount monuments of several groundwater and soil gas monitoring wells. These groundwater and soil gas monitoring wells are likely related to the monitoring of the former Rossman’s Landfill site. Details of the former Rossman’s Landfill site is presented in the Oregon (OR) Department of Environmental Quality (DEQ) Environmental Cleanup Site Information (ECSI) database with ECSI identification (ID): 674. The presence of these groundwater and soil gas monitoring wells along the gravel access road right-of-way **does represent a potential REC** for the Subject Property.

Note that additional findings and details of the site reconnaissance are presented in Section 9.0 of this report.

Records Review

The record review of ECSI sites within a 0.5-mile radius of the Subject Property identified:

- Stimson Mill (Former) | ECSI ID: 1965 (***for Subject Property***)
- Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288
- Rossman’s Landfill | ECSI ID: 674
- Landeen Welding | ECSI ID: 3108
- Bud’s Radiator Shop | ECSI ID: 1968
- Unpermitted Rossman Landfill | ECSI ID: 1238
- Old Rossman Landfill – South | ECSI ID: 3126
- Parker Pond / The Apartments | ECSI: 5138
- Clackamette Cove | ECSI ID: 2301
- Clackamette Cove Area | ECSI ID: 3187
- Al’s Machine (Former) | ECSI ID: 2900
- Jeff Lohr Residence | ECSI ID: 129

Note that additional details of these ECSI sites are presented in Section 6.0 of this report. The record review of DEQ Leaking Underground Storage Tank (LUST) sites within a 0.2-mile radius of the Subject Property identified:

- Kelly Field Cardlock | LUST ID: 03-95-0093
- Stein Oil/Kelly Field | LUST ID: 03-89-0148
- Clackamas County DTD | LUST ID: 03-91-0385
- Oregon Public Works | LUST ID: 03-02-5068

Note that the “Status” of all these LUST sites were “Closed.” Additional records reviews findings and details are presented in Section 5.0 thru Section 8.0 of this report.

1.4 Hazardous Substances

No obvious hazardous substances were observed on the Subject Property or adjoining properties during the site reconnaissance.

1.5 Findings, Opinions, and Recommendations

The findings, opinions, and recommendations derived from the evaluation of this Phase I ESA are presented below.

1.5.1 Findings

A Recognized Environmental Conditions (RECs) is defined as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of future release.”

The identified RECs for the Subject Property include:

- The ROSSMAN’S LANDFILL (EDR ID: J49) site. The ROSSMAN’S LANDFILL (EDR ID: J49) site was a historic landfill site (ECSI ID: 674, EPA CERCLIS ID: 052210150, and DEQ Permit ID: 115) that has completed environmental site investigations, operates active environmental leachate and soil gas mitigation systems, and is monitored semiannually. The investigative status of this site is “Contamination Suspected;” and the action underway or needed is “Prospective Purchaser Agreement.”

Other EDR Listings related to the ROSSMAN'S LANDFILL (EDR ID: J49) site include:

- Rossman Methane Recovery Facility (EDR ID: J48)
- Willamette Hi-Grade Concrete Co (EDR ID: C7 and C8)
- Francis Welsh Silica Mine (EDR ID: C13 and C14)
- NW Natural Pipeline at Rossman Landfill (F29 and F32)

Review and assessment of select environmental documents and other information indicate that due to the potential for volatile organic compounds (VOCs) and heavy metals in the shallow groundwater, and VOCs and methane in the soil gas to migrate and impact the Subject Property, **the ROSSMAN'S LANDFILL (EDR ID: J49) site on the southeast adjoining property does represent a REC for the Subject Property.**

Note that select environmental investigations of the ROSSMAN'S LANDFILL (EDR ID: J49) site implied that buried wood debris materials on and/or near the Subject Property may be contributing to some of the methane detected in the soil gas. The former wood debris pile areas on and near the Subject Property are depicted on Figure 3.

Additional details for this REC are presented in Section 6.0 of this Report.

A **Historical Recognized Environmental Condition (HREC)** is defined as “a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority and meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (e.g. property use restrictions, AULs, institutional controls, or engineering controls).”

The identified HRECs for the Subject Property include:

- The STIMSON MILL (Former) [EDR ID: A1 and A2] site. The STIMSON MILL (Former) [EDR ID: A1 and A2] site is part of the historic Stimson Lumber Mill site (ECSI ID: 1965) that had completed environmental site investigations.

Note that the Stimson Lumber Mill site was separated into Parcel 1 (part of 1757 Washington St); and Parcel 2 (part of 1757 Washington St and all of 1799 Washington St). The approximate boundary of the Stimson Lumber Mill site, Parcel 1 and Parcel 2 is depicted in Figure 3.

The investigative status of the STIMSON MILL (Former) [EDR ID: A1 and A2 | ECSI ID: 1965] site is “No Further Action Needed;” and the action underway or needed is “No Further State Action Required.”

Other EDR Listings related to the STIMSON MILL (Former) [EDR ID: A1 and A2] site include:

- STIMSON LUMBER COMPANY (EDR ID: A3)
- STIMSON MILL FORMER (EDR ID: A4)

Review and assessment of select environmental documents and other information indicate that Total Petroleum Hydrocarbon (TPH) impacted soil had been remediated by soil excavations, thermal treatment, and disposal.

Note that the removed TPH impacted soil area was located in the parking lot area on the southwest adjoining property identified as 1757 Washington St, and not on the current Subject Property (refer, Figure 3).

Because the TPH impacted soil was remediated to the satisfaction of the DEQ and a “NFA” designation was granted to this site, **the STIMSON MILL (Former) [EDR ID: A1 and A2] sites, the STIMSON LUMBER COMPANY (EDR ID: A3) site, and the STIMSON MILL FORMER (EDR ID: A4) site on the Subject Property does represent a HREC for the Subject Property.**

Note that due to the operations of the Subject Property as a Lumber Mill and the equipment likely used throughout the entire site, additional areas of TPH impacted soils may be encountered during site excavation activities.

Note that due to the operations of the Subject Property as a Lumber Mill buried wood debris material may be encountered during site excavation activities.

Additional details for this HREC are presented in Section 6.0 of this Report.

The following ECSI listed sites located nearby the Subject Property were also identified as HRECs for the Subject Property.

- **Landeem Welding (aka Maverick Welding Supply) | ECSI ID: 3108**
 - 1739 Washington St, OR 97045
- **Bud's Radiator Shop | ECSI ID: 1968**
 - 1715 Washington St, Oregon City, OR 97045
- **Al's Machine (Former) | ECSI: 2900**
 - 1608 Washington St, Oregon City, OR 97045
- **Jeff Lohr Residence | ECSI ID: 129**
 - 1206 Washington St, Oregon City, OR 97045

Additional details for these HRECs are presented in Section 6.0 of this Report.

A **Controlled Recognized Environmental Condition (CREC)** is defined as “a REC from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (e.g. as evidenced by the issuance of a NFA letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (e.g. property use restrictions, AULs, institutional controls, or engineering controls).”

The identified CREC for the Subject Property include:

- The STIMSON LUMBER – PARCEL 1 (FORMER) [EDR ID: 5] site is part of the historic Stimson Lumber Mill site (ECSI ID: 2288) that had completed environmental site investigations, and had implemented engineering and institutional controls to allow Pentachlorophenol (PCP) to remain in-place by capping, drainage control, and regular inspections.

Note that the Stimson Lumber Mill site was separated into Parcel 1 (part of 1757 Washington St); and Parcel 2 (part of 1757 Washington St and all of 1799 Washington St). The approximate boundary of the Stimson Lumber Mill site, Parcel 1 and Parcel 2 is depicted in Figure 3.

The investigative status of the STIMSON LUMBER – PARCEL 1 (FORMER) [EDR ID: 5] site is “Listed on the Confirmed Release List or Inventory;” and the action underway or needed is “No Further Action (Conditional).”

Review and assessment of select environmental documents and other information indicate that impacts from the PCP in the soil is being mitigated with engineering controls (i.e. capping, drainage control, and regular monitoring) and institutional controls (i.e. Conditional NFA).

Note that the PCP impacted soil area is located below the Orgon City Station - AMTRAK station and platform on the southwest adjoining property identified as 1757 Washington St, and not on the current Subject Property (refer, Figure 3).

Because the PCP impacted soil is being controlled and monitored to the satisfaction of the DEQ and a Conditional NFA designation was granted to this site, **the STIMSON LUMBER – PARCEL 1 (FORMER) [EDR ID: 5] site on the southwest adjoining property does represent a CREC for the Subject Property.**

Note that review and assessment of select environmental documents indicated that there was a potential for the rail road track ballast rocks to be a preferential migration pathway or conduit for stormwater and/or surface water runoff.

Additional details for this HREC are presented in Section 6.0 of this Report.

The following ECSI listed sites located nearby the Subject Property were also identified as CRECs for the Subject Property.

- **Unpermitted Rossman Landfill PPA | ECSI ID: 1238**
 - Agness St, Oregon City, OR 97045
- **Old Rossman Landfill – South | ECSI ID: 3126**
 - Agnes St, Oregon City, OR 97045
- **Parker Pond / The Apartments | ECSI: 5138**
 - 16421 Main St, Oregon City, OR 97045
- **Clackamette Cove Area | ECSI ID: 3187**
 - 16288 Main St, Oregon City, OR 97045
- **Clackamette Cove | ECSI ID: 2301**
 - 16288 Main St, Oregon City, OR 97045

Additional details for these HRECs are presented in Section 6.0 of this Report.

A **“de minimis” condition** is defined as “a condition related to a release that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate government agencies.”

- During the site reconnaissance, the select site features were identified as “de minimis” conditions.
 - a vehicle and equipment **maintenance supply shed** used for the storage of vehicle maintenance products (i.e. oil, gear lubricant);
 - a semi-trailer on wheels used for general storage and as a **general mechanical work shop**;
 - stormwater **catch basins**;
 - stormwater **outfalls**;
 - stormwater **drainage ditches and culverts**; and
 - **crushed asphalt debris material**.

- Review of the EDR Vapor Encroachment Screen report indicated that the following EDR listed sites are not considered RECs for the Subject property due their “NFA” and/or “Closed” designations, and/or their down- or cross-gradient locations relative to the Subject Property and the groundwater flow direction, and are considered “de minimis” conditions.
 - KELLY FIELD CARDLOCK | (EDR ID: C9)
 - AUTO TECHNIQS AUTOMOTIVE | (EDR ID: C10)
 - STEIN OIL/KELLY FIELD | (EDR ID: C11)
 - SMITTY’S UPHOLSTERY | (EDR ID: B12)
 - BUDS RADIATOR SHOP | (EDR ID: B15)
 - BUD’S RADIATOR SHOP | (EDR ID: B17)
 - METRO SOUTH STATION | (EDR ID: 18)

A Business Environmental Risk (BER) is defined as “a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice.”

The identified BER to consider for the Subject Property include:

- Groundwater use is not allowed, and the City of Oregon City adopted Ordinance No. 94-1022 which prohibits well drilling in the Cove area without first consulting with DEQ.
- During design and construction of buildings and related structures on the Subject Property, DEQ will may likely require safeguards be in place (i.e. contaminated media management plan, engineering controls if the property is occupied by urban residential uses, etc.) to be protective of human health and the environment.

1.5.2 Opinions

The DEQ investigative status of the Subject Property is “No Further Action Needed;” and the Subject Property appears to be generally ready for development.

However, REC, HREC, CREC, and BERs have been identified on and/or near the Subject Property. And, select environmental site conditions could be further investigated to evaluate and/or confirm current subsurface soil, groundwater, and/or soil gas conditions.

These select environmental conditions include:

- The preferential migration of PCP and TPH along the railroad track ballast rock;
- The presence of buried wood debris material below the Subject Property;
- VOCs and heavy metals in Groundwater Related to Rossman’s Landfill (EDR ID: J49);
- VOCs and Methane in Soil Gas Related to Rossman’s Landfill (EDR ID: J49);
- TPH in soil, groundwater, and/or soil gas related to the Stein – Chevron – Tank Farm / Kelly Field site (EDR ID: C9, C10, and C11);
- Potential UICs Related to Observed Stormwater Catch Basins on the Subject Property; and
- Note that a potential flood risk does exist for the Subject Property.

It is EW’s opinion that the Subject Property may warrant some additional targeted environmental investigations in cooperation with the DEQ Voluntary Cleanup Program (VCP) to evaluate and/or confirm current subsurface soil, groundwater, and/or soil gas conditions in an effort to be protective of human health and the environment, and to facilitate any future development of the Subject Property.

1.5.3 Recommendations

EW recommends the owner of the Subject Property engage with the DEQ VCP to consider/develop a “Prospective Purchaser’s Agreement (PPA)” for future site development and use; and/or develop a workplan for a focused environmental investigation of the Subject Property.

The recommended additional work should be performed by a qualified environmental professional.

2.0 INTRODUCTION

2.1 Purpose

EW was contracted by the City of Oregon City – Department of Economic Development (Mr. James Graham, CEcD), Client, to conduct this Phase I ESA for the Subject Property located at 1799 Washington St in Oregon City, Clackamas County, Oregon (State Identification: 22E29 01402). Note the Subject Property and other adjoining parcels to the southwest were also found to have historically been identified as 1795 Washington Street, Oregon City, OR; and the address of the current occupants of the Subject Property (Clackamas Landscape Supply Inc) is 1795 Washington Street, Oregon City, OR. The location of the Subject Property is presented in Figure 1.

The Subject Property appeared to be located within the “Downtown” Urban Renewal District, and zoned as “Mixed Use Downtown (MUD)” in the City of Oregon City parcel property information database (<https://www.orcity.org/397/OC-WebMaps>).

This Phase I ESA was conducted for the purpose of identifying RECs that may impact the Subject Property to qualify for LLPs under CERCLA.

2.2 Scope of Services

The purpose of the Phase I ESA is to assist the Client in identifying potential environmental liabilities or RECs associated with the presence of any hazardous substances or petroleum products, their use, storage, and disposal at and in the vicinity of the Subject Property, as well as regulatory non-compliance that may have occurred at the Subject Property and in the vicinity of the Subject Property. The assessment activities for the Subject Property and in the vicinity of the Subject Property focused on:

- A review of historical sources to help ascertain previous land use(s) at the Subject Property and in the surrounding area;
- A review of federal, state, tribal and local databases that identify and describe underground fuel tank sites, leaking underground fuel tank sites, hazardous waste generator sites, and hazardous waste storage and disposal facility sites within the ASTM approximate minimum search distances (AMSD);

- A site reconnaissance of the Subject Property and surrounding properties; and
- Completion of questionnaires and interviews with available past and present owners, occupants, and operators to identify historic operations and uses related to potential environmental conditions.

The objective in conducting this Phase I ESA was to identify potential indications for an existing release, a past release, or a material threat of a release of any hazardous substance or petroleum products that may impact the Subject Property.

2.2.1 Vapor Encroachment Conditions

The Phase I ESA ASTM Standard was updated in 2013 to include an evaluation of Vapor Encroachment Conditions (VECs) of concern under the usual Scope of the Phase I ESA. Vapor encroachment occurs when vapors from volatile chemicals in contaminated soil or groundwater on and/or near the Subject Property migrate upwards into the indoor air of overlying buildings. The chemicals responsible for vapor encroachment include volatile organic compounds (VOC), semi-volatile organic compounds (SVOCs), and volatile inorganic compounds such as mercury. Once contaminant vapors enter a structure, they may accumulate and potentially pose health hazards for the building occupants.

To ensure that vapor encroachment was appropriately considered when performing a Phase I ESA, the ASTM revised its Vapor Encroachment Standard (ASTM E2600-15) in 2015. In accordance with the new standard, two conditions were evaluated: VEC and pVEC (potential VEC). A VEC results from “the presence or likely presence of any chemicals of concern in the indoor air environment of existing or planned structures on a property caused by the release of vapor from contaminated soil or groundwater on the property or within close proximity to the property, at a concentration that presents or may present an unacceptable health risk to occupants. A pVEC results from “a condition that exists when screening indicates the possibility of a VEC, but where there is insufficient data to ascertain the presence or likely presence of chemicals of concern (COCs) in the indoor air environment.” COCs were defined by the ASTM to be “chemicals in the subsurface environment that are known or reasonably expected to be present, that can

potentially migrate as a vapor into an existing or planned structure on a property, and that are generally recognized as having the potential for an adverse impact on human health.”

2.3 Authorization and User Reliance

The City of Oregon City – Department of Economic Development (Mr. James Graham, CEcD), Client, authorized the scope of work on September 20, 2023.

This Phase I ESA report was provided for the sole use of the owner of the Subject Property, City of Oregon City, and their designated agents. No other parties should rely upon the contents of this report without the express written consent of the City of Oregon City and EW. Findings discussed herein are relevant to the dates of the site work and should not be relied upon to represent site conditions on other dates.

Any reliance on or use of this report by any party other than the Client will be at such third party’s risk, and no warranties or representations, expressed or implied, are made to any third parties.

2.4 Report Expiration Date

The information, findings, conclusions, opinions, and recommendations presented within this Phase I ESA report may be relied upon for 180 days following the date of this report in accordance with Section 4.6 of ASTM Standard Practice E 1527-21. The continued viability of this Phase I ESA report beyond 180 days of the report date is subject to the requirements of Sections 4.6 and 4.7 of ASTM Standard Practice E 1527-21. Note that select parts of this Phase I ESA report may be viable for up to one (1) year from the date of this report.

3.0 SITE DESCRIPTIONS AND DETAILS

The descriptions and details of the Subject Property and the surrounding area were generally derived from the City of Oregon City - OC WEBMAPS parcel property information database (<https://www.orcity.org/397/OC-WebMaps>), the Clackamas County - CMAP parcel property information database (<https://cmap.clackamas.us/maps>), the City of Portland - PortlandMaps parcel property information database (<https://www.portlandmaps.com>), select aerial photos, and the site reconnaissance.

3.1 Subject Property Location and Legal Description

Subject Property Name:	NE Portion of the Former Stimson Property-Parcel 2
Parcel Address:	1799 Washington St , Oregon City, Oregon 97045
Current Occupant Address:	<i>"Clackamas Landscape Supply Inc"</i> 1795 Washington St , Oregon City, Oregon 97045
Historical Address:	<i>"Stimson Mill" Insert Other Names</i> 1795 Washington St , Oregon City, Oregon 97045
Jurisdictions:	City of Oregon City / Clackamas County
Property ID:	C156892
State ID:	22E29 01402
Parcel Number:	01692779
State ID:	22E31AD09400
Land Type:	COM – COMMERCIAL LAND
Land Area:	6.83 acres (297,515 sq ft)
Neighborhood:	Two Rivers
Current Use:	Occupied and operated as a Commercial Landscape Supply Distribution company identified as "Clackamas Landscape Supply, Inc"
Number of Buildings:	One (1) Mobile Trailer Type Building Used as an Office and Dispatch; One (1) Display Type Shed Structure; One (1) Vehicle and Equipment Maintenance Supply Shed used to store maintenance petroleum products, and One (1) Semi-Trailer used for general storage and general maintenance work shop. None of these structures were built on permanent foundations.
Basement:	None

3.2 Subject Property Description

The Subject Property is a 6.83-acre Mixed-Use Downtown (MUD) zoned parcel located at 1799 Washington St in Oregon City, Clackamas County, Oregon. The location of the Subject Property is presented on Figure 1. The boundaries and zoning designations of the Subject Property and neighboring properties are presented on Figure 2.

The Subject Property is identified as 1799 Washington St in Oregon City, Clackamas County, Oregon in the City of Oregon City - OC WEBMAPS, the Clackamas County - CMAP, and the City of Portland - PortlandMaps parcel property information databases.

However, the Subject Property as a whole and as part of the Former Stimson Lumber Mill Property is also identified as 1795 Washington St, Oregon City, Oregon. And, the Subject Property is occupied by a commercial landscape supply distribution business (identified as "Clackamas Landscape Supply, Inc.") with the business address of 1795 Washington St, Oregon City, Oregon

According to the City of Oregon City - OC WEBMAPS parcel property information database, the Subject Property and most of the neighboring properties are zoned as MUD. The adjoining properties to the north (Tri-City Wastewater Treatment Plant) and northeast (Metro South Transfer Station) are zoned General Industrial (GI).

Note that the Subject Property was once a portion (northeastern) of the Former Stimson Lumber Mill Property; and the Former Stimson Lumber Mill Property was also segmented into Parcel 1 and Parcel 2 (likely for environmental closure purposes). The current boundary of the Subject Property relative to the historic boundaries of the Former Stimson Lumber Mill Property are depicted in Figure 3.

3.3 Adjoining Properties Details and Descriptions

RELATIVE LOCATION	PARCEL ADDRESS	PARCEL LAND TYPE	PARCEL STATE ID
South	Washinton St (Right-of-Way) then	-	-
	1726 Washington St <i>"End of the Oregon Trail Interpretive Center"</i>	Commercial Land	22E29CA00500
Southwest	1757 Washington St <i>"Oregon City Station"</i>	Commercial Land	22E29 01403
West	Rail Tracks (Right-of-Way) then	-	-
	Highway 205 (Right-of-Way) then	-	-
	1913 Main St <i>"Edgewater at the Cove - Apartments"</i>	Multi-Family Residential	22E29 02900
West	Rail Tracks (Right-of-Way) then	-	-
	Highway 205 (Right-of-Way) then	-	-
	No Situs	Vacant	22E29 02300
Northwest	Rail Tracks (Right-of-Way) then	-	-
	Highway 205 (Right-of-Way) then	-	-
	No Situs	Vacant	22E29 02100

RELATIVE LOCATION	PARCEL ADDRESS	PARCEL LAND TYPE	PARCEL STATE ID
Northwest	Rail Tracks (Right-of-Way) then	-	-
	Highway 205 (Right-of-Way) then	-	-
	No Situs	Commercial Land	22E29 01510
North-Northwest	Rail Tracks (Right-of-Way) then	-	-
	Highway 205 (Right-of-Way) then	-	-
	No Situs	Commercial Land	22E29 01504
North-Northwest	Rail Tracks (Right-of-Way) then	-	-
	Highway 205 (Right-of-Way) then	-	-
	16320 Agnes Ave	Commercial Land	22E29 01506
North-Northwest	Rail Tracks (Right-of-Way) then	-	-
	Highway 205 (Right-of-Way) then	-	-
	16300 Agnes Ave <i>"Old Rossman Landfill"</i>	Vacant	22E29 01507
North	Rail Tracks (Right-of-Way) then	-	-
	Highway 205 (Right-of-Way) then	-	-
	No Situs <i>"Old Rossman Landfill"</i>	Vacant	22E29 01509
North	Rail Tracks (Right-of-Way) then	-	-
	No Situs	Vacant	22E29 01400
North	Rail Tracks (Right-of-Way) then	-	-
	No Situs	Vacant	22E29 00400

RELATIVE LOCATION	PARCEL ADDRESS	PARCEL LAND TYPE	PARCEL STATE ID
North-Northeast	Rail Tracks (Right-of-Way) then	-	-
	No Situs	Vacant	22E29 00800
North-Northeast	Rail Tracks (Right-of-Way) then	-	-
	No Situs	Vacant	22E29 00801
Northeast	Access Road (Right-of-Way) then	-	-
	2001 Washington St <i>"Metro South Transfer Station"</i>	Industrial Land	22E29 00904
East-Northeast	Washington St (Right-of-Way) then	-	-
	2002 Washington St <i>"Home Depot"</i>	Commercial Land	22E29 00906
East	Washington St (Right-of-Way) then	-	-
	1105 Abernathy Rd (aka 1101 17th St) <i>"Trails End Golf Center"</i> <i>"Rossman's Landfill"</i> <i>"Unpermitted Rossman Landfill"</i>	Industrial Land	22E29 00902
Southeast	Washington St (Right-of-Way) then	-	-
	1810 Washington St	Commercial Land	22E29 00906
Southeast	Washington St (Right-of-Way) then	-	-
	1780 Washington St <i>"Stark Street Lawn & Garden Oregon City"</i>	Commercial Land	22E2CA00400

The locations and descriptions of the Subject Property and select surrounding properties are presented on Figure 2.

The properties adjoining the Subject Property appeared to be generally occupied by a railroad track, a train station (Oregon City Station – Amtrak), Highway 205, multi-family residential apartments, Tri-City Wastewater Treatment Plant, Metro South Transfer Station, Metro South Hazardous Waste station, other commercial and retail businesses (including Trails End Golf Center, Stark Street Lawn & Garden-Oregon City, End of the Oregon Trail Interpretive Center, Airgas Store, State of the Art Body and Paint, and Oregon Rain Harvest), general storage yards, open fields, trails, surface water drainage ditches, culverts, and natural areas.

The properties adjoining the Subject Property is depicted on Figure 4.

4.0 PHYSICAL SETTING

4.1 Subject Property Coordinates

Latitude (North):	45° 22' 02.30"
Longitude (West):	122° 35' 37.55"

4.2 Geology

The geology below the Subject Property is the Holocene aged alluvial deposits. The alluvial deposits generally consist of sand, gravel, and silt forming flood plains and filling channels of present streams; in places includes talus and slope wash; and locally includes soils containing abundant organic material, and thin peat beds (Walker, G.W. and Macleod, N.S. 1991).

Specifically, the Subject Property is located on an alluvial terrace formed by the sedimentation in an abandoned meander channel of the Clackamas River. According to investigations performed by others, the alluvium below the Subject Property appeared to consist of two zones, an upper fine-grained zone that ranges from 20 to 47 feet in thickness and a lower coarse-grained zone which varies from 15 to 40 feet in thickness. The upper fine-grained zone is composed of silt, clay, and fine sand. The lower coarse-grained zone is composed primarily of basaltic gravel with fine to coarse grain sand (CH2M Hill, 1988).

4.3 Topography

According to the USGS Oregon City Quadrangle topographic map (Oregon City, OR, 2020), the local topography within the near vicinity of the Subject Property is generally level ground-surface with a slight downward slope toward the southeast to stormwater drainage ditches with buried culverts along Washington Street. And, the Subject Property is generally bound between topographic highs to the southeast (Former Rossman Landfill) and northwest (Railroad Tracks and Highway 205).

According to the PortlandMaps parcel property information database (<https://www.portlandmaps.com>), the ground at the Subject Property is approximately 37 feet (ft) above mean sea level (amsl).

It was noted during the site reconnaissance that the surface topography of the Subject Property appeared to generally slope slightly downward toward the south and southeast to stormwater drainage ditches with buried culverts along Washington Street; and a man-made ramp type surface feature located within the central area of the Subject Property along the northwest property boundary (likely related to tree loading operations at the Former Stimson Mill) sloped downward toward the northeast. It was also noted during the site reconnaissance that stormwater diversion ditches or swales were present on the southwest adjoining property (1757 Washington St), and a small pond was located on the northeast adjoining property (2001 Washington St).

The surface topography in the vicinity of the Subject Property is presented on Figure 1.

4.4 Hydrology

The Subject Property is located approximately 0.24-mile to the north of Abernathy Creek, approximately 0.28-mile to the south-southeast of Clackamette Cove, approximately 0.39-mile to the east of the Willamette River, and approximately 0.57-mile to the southeast of the Clackamas River. The Clackamas River generally flows from the east to the west into the Willamette River. Abernathy Creek generally flows from the east-southeast to the west-northwest into the Willamette River. And, the Willamette River generally flows from the south to the north into the Columbia River.

The surface water flow direction on the Subject Property appeared to be south and southeast to stormwater drainage ditches with buried culverts along Washington Street.

The surface water flow direction in the near vicinity of the Subject Property appeared to generally be to the southwest toward Abernathy Creek or to the southeast to the stormwater drainage ditches with buried culverts along Washington Street.

Stormwater drainage ditched and/or buried culverts appeared to be located along portions of Washington Street, along the northwest property boundary, and across the northeast portion of the property. The approximate locations of drainage ditches and buried culverts are depicted in Figure 4.

Based on the local topographies of the ground surfaces, the relative locations of the surface water bodies and the general flow directions of the nearby rivers and creek, the inferred local groundwater flow direction of the shallow unconfined groundwater aquifer below and near the Subject Property is likely to the west-northwest toward Clackamette Cove, the confluence of the Willamette River and the Clackamas River, and/or Willamette River.

According to the City of Oregon City Public Works – General Floodplain Map, the Subject Property and all adjoining properties lies within the 100-year floodplain.

Review of select Oregon Water Resources Department (OWRD) monitoring well reports presented in the OWRD well logs database (<https://apps.wrd.state.or.us>) indicated that a shallow unconfined groundwater aquifer appeared to be present near the Subject Property at depths ranging from about 15 ft below ground surface (bgs) to 26 ft bgs. The select OWRD monitoring well reports were identified as CLAC 18900, CLAC 18901, CLAC 18902, CLAC 18903, CLAC 18904, CLAC 18909, and CLAC 18910. Copies of the reviewed OWRD monitoring well report for borings advanced near the Subject Property are presented in Appendix A.

According to investigations performed by others, the upper fine-grained zone is mostly above the groundwater table and is unsaturated. However, perched groundwater lenses were present locally throughout the zone. The lower coarse-grained zone is saturated and represents the primary shallow groundwater aquifer in the vicinity of the Subject Property. In addition, it was noted that the upper fine-grained zone may be semi-confined (CH2M Hill, 1988).

Note that the City of Oregon City adopted Ordinance No. 94-1022 that prohibited water well drilling in the vicinity of the Subject Property and Clackamette Cove without first consulting the DEQ.

4.5 Soils

A review of the United States Department of Agriculture (USDA) Soil Survey (<https://websoilsurvey.nrcs.usda.gov>) for the vicinity of the Subject Property identified the soils below the majority of the Subject Property and adjoining properties to the west, north, east, and southwest as the Urban Land in Map Unit 82. No soil profile descriptions were presented for the Urban Land (Map Unit 82).

Review of the USDA Soil Survey for the vicinity of the Subject Property identified the soils below a small portion of the Subject Property along the south-southeast and the adjoining properties to the south-southeast as Newburg Fine Sandy Loam in Map Unit 67. The soil profile description for the Newburg Fine Sandy Loam (Map Unit 67) indicated a typical profile of fine sandy loam from about 0-inches to 23-inches, fine sand from 23-inches to 42-inches, and extremely gravelly sand from 42-inches to 60-inches.

Review of select OWRD monitoring well reports presented in the OWRD well logs database (<https://apps.wrd.state.or.us>) indicated that the soil types encountered below the Subject Property during drilling activities were generally gravel fill from 0-ft to 2-ft bgs, silt from 2-ft to a range of 15-ft to 22 ft bgs, and silty sand from a range of about 15-ft to 22 ft bgs to 35 ft bgs. The select OWRD monitoring well reports were identified as CLAC 18900, CLAC 18901, CLAC 18902, CLAC 18903, CLAC 18904, CLAC 18909, and CLAC 18910. Copies of the reviewed OWRD monitoring well report for borings advanced near the Subject Property are presented in Appendix A.

5.0 USER PROVIDED INFORMATION

5.1 Title Search

A Preliminary Title Report and/or title report document was not provided to EW by the owner and/or the owner representative of the Subject Property (City of Oregon City, and City of Oregon City | Department of Economic Development - Mr. James N. Graham, CEcD).

5.2 Environmental Liens

A Preliminary Title Report document was not provided by the owner and/or the owner representative of the Subject Property (City of Oregon City, and City of Oregon City | Department of Economic Development - Mr. James N. Graham, CEcD), and the presence of Environmental Liens, or Activity and Use Limitations for the Subject Property was not able to be evaluated from a Preliminary Title Report document.

EDR conducted a search of available current land title records for environmental cleanup liens and other AULs, such as engineering controls and institutional controls. The results of that search indicated that there were no environmental liens or AULs recorded for the Subject Property.

The EDR search of available current land title records did identify a "Warranty Deed" for the Subject Property and the southwest adjoining property (1757 Washington St). This Warranty Deed (96-082841) indicate that there were no environmental liens or AULs recorded for the Subject Property. However, several "limitation of access," "access restrictions," "covenants, conditions, restrictions and reservations," and "Plat restrictions" were noted in Exhibit B of the Warranty Deed. The EDR Environmental Lien and AUL Search report is present in Appendix B.

In addition, review of select environmental documents for the northeast adjoining Former "Rossman's Landfill" property (ECSI ID: 674) identified a "Declaration and Establishment of Protective Covenants, Conditions and Restriction and Grants of Easements," and a DEQ "Solid Waste Disposal Closure Permit" (Permit No: 115) which defines specific restrictions and responsibilities for the property. Additional details of these use restrictions and owner responsibilities are presented in Section 6 of this report.

5.3 Owner Provided Documents

The following documents were presented to EW for review by the owner and/or the owner representative of the Subject Property (City of Oregon City, and City of Oregon City | Department of Economic Development - Mr. James N. Graham, CEcD).

The owner provided documents included:

- SEACOR, "PHASE III SOIL AND GROUNDWATER INVESTIGATION REPORT, STIMSON LUMBER MILL FACILITY," July 29, 1994. (File ID: 1994-07-29 Soil and Groundwater Report.pdf)
- SECOR International Incorporated, "REMEDIAL SOIL EXCAVATION REPORT, STIMSON LUMBER MILL FACILITY," July 3, 1996. (File ID: 1996-07-03 Remedial Soil Excavation Report.pdf)
- ODEQ, "Re: No Further Action, Former Stimson Lumber Company, Oregon City, Oregon, ECSI# 1965, July 6, 2000. (File ID: 2000-07-06 DEQ No Further Action ltr)
- *Unknown Source*, "EXHIBIT A, Site Drawing 112111," *date unknown*. (File ID: Exhibit A Site Drawing 112111.pdf)
- SQUIER ASSOCIATES, "Re: Modified Level I Environmental Site Assessment, Stimson Lumber Company, Oregon City, Oregon," February 6, 1992. (File ID: Mod Lvl 1 Envir Site Assmnt Stimson Lumber 020692.pdf)
- City of Oregon City, "Taxlot Detail Report," August 15, 2023. (File ID: Tax Lot Map 1795 Washington St.pdf)

These documents are presented in Appendix C.

Note that on November 26, 2023, EW submitted a public records request to the DEQ for all available environmental documents related to the Subject Property. EW received the numerous documents from the DEQ on October 5, 2023. The DEQ provided documents are presented in Appendix D.

The owner provided documents (listed above), the DEQ provided documents; and other identified environmental reports and documents are discussed in more detail within Section 6 of this report.

5.4 Specialized Knowledge – Subject Property and Adjoining Properties

Environmental questionnaires were presented to the owner representative of the Subject Property (City of Oregon City, and City of Oregon City | Department of Economic Development - Mr. James N. Graham, CEcD) that inquired about specialized knowledge they may have concerning historic environmental issues at the Subject Property. The

owner representative of the Subject Property did not respond to the environmental questionnaires.

However, the owner representative of the Subject Property did pass along the environmental questionnaires to the current occupant of the Subject Property and likely most readily available and knowledgeable person of the site history. The current occupant of the Subject Property was identified as Mr. Steve Pearson, the owner and operator of Clackamas Landscape Supply, Inc. The environmental questionnaires were completed by Mr. Steve Pearson. A copy of the completed environmental questionnaires is presented in Appendix E. In the environmental questionnaires, Mr. Steve Pearson indicated that the Subject Property was used as a “Lumber Mill” in the past, and he was not aware of any environmental liens and/or any activity and land use limitations (AULs). In addition, Mr. Steve Pearson indicated that flooding conditions existed, a gasoline station and a landfill were historically present on adjoining properties.

5.5 Interview with Owner – Subject Property and Adjoining Properties

Based on discussions with the owner representative of the Subject Property (City of Oregon City, and City of Oregon City | Department of Economic Development - Mr. James N. Graham, CEcD) and the documents provided by the owner representative, a formal environmental interview with the owner representative was not performed.

5.6 Interview with Current Occupant – Subject Property

A general interview with the current occupant of the Subject Property, Mr. Steve Pearson (the owner and operator of Clackamas Landscape Supply, Inc) was performed on October 12, 2023 (prior to performing the site reconnaissance). Mr. Steve Pearson provided general information about the Former Stimson Lumber Mill that had historically operated on the Subject Property; identified the likely remnants of the concrete foundation slabs and a small concrete wall related to the Former Stimson Lumber Mill building structures (razed); the current distribution operations of the Clackamas Landscape Supply business; and the historic flooding related to the Willamette River Flood of 1996.

Mr. Steve Pearson did not discuss or identify any environmental issues, environmental liens, and/or any AULs related to the Subject Property.

5.7 Past Owners, Operators and Occupants

Other past owners, operators, managers, and/or occupants were not readily available to be interviewed.

5.8 Local News Articles

A limited search of the Oregonian news online archives (oregonlive.newsbank.com) did identify several news articles related to environmental issues on the Subject Property. However, the information reviewed within the Oregonian Archives - Oregonian Historical Pages (1861 – 2018) were limited.

Note that other sources of detailed information related to environmental issues were identified.

6.0 ENVIRONMENTAL REPORTS AND DOCUMENTS

A search for readily available environmental reports and related documents were performed for the Subject Property and for the surrounding area within a 0.5-mile radius of the Subject Property.

A request for “Public Records at DEQ” (<https://www.oregon.gov/deq/about-us/pages/request-public-record>) was made on November 26, 2023 for the Subject Property (1799 Washington St) and the Former Stimson Mill property (1795 Washington St). The DEQ provided copies of environmental reports and related documents for:

- Stimson Mill (Former) / ECSI ID: 1965
 - 1795 Washington St, Oregon City, OR 97045
- Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288
 - 1795 Washington St, Oregon City, OR 97045

In addition, the DEQ Environmental Cleanup Site Information (ECSI) Database (<https://www.oregon.gov/deq/hazards-and-cleanup/env-cleanup/pages/ecsi>) was searched for ECSI sites within a 0.5-mile radius of the Subject Property; and for available environmental reports and related documents. The ECSI sites identified within a 0.5-mile radius of the Subject Property included:

- Stimson Mill (Former) | ECSI ID: 1965
- Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288

- Rossman's Landfill | ECSI ID: 674
- Landeen Welding | ECSI ID: 3108
- Bud's Radiator Shop | ECSI ID: 1968
- Unpermitted Rossman Landfill | ECSI ID: 1238
- Old Rossman Landfill – South | ECSI ID: 3126
- Parker Pond / The Apartments | ECSI: 5138
- Clackamette Cove | ECSI ID: 2301
- Clackamette Cove Area | ECSI ID: 3187
- Al's Machine (Former) | ECSI ID: 2900
- Jeff Lohr Residence | ECSI ID: 129

Summary details of the environmental reports and related documents provided by DEQ; and the information, environmental reports, and related documents identified in the ECSI database is presented below.

6.1 Subject Property Identified as Stimson Mill (Former) | ECSI ID: 1965 – Environmental Reports and Documents List

Environmental reports and documents related to the Subject Property provided by the owner representative of the Subject Property (City of Oregon City, and City of Oregon City | Department of Economic Development - Mr. James N. Graham, CECD) included:

- 1994-07-29 Soil and Groundwater Report.pdf
- 1996-07-03 Remedial Soil Excavation Report.pdf
- 2000-07-06 DEQ No Further Action ltr.pdf
- Exhibit A Site Drawing 112111.pdf
- Mod Lvl 1 Envir Site Assmnt Stimson Lumber 020692.pdf
- Tax Lot Map 1795 Washington St.pdf

Copies of the environmental reports and other documents related to the Subject Property provided by the owner representative of the Subject Property are presented in Appendix C.

An environmental document related to the Subject Property identified as Stimson Mill (Former) | ECSI ID: 1965 retrieved from the DEQ Environmental Cleanup Site Information (ECSI) database included:

- No.1965 NFA.pdf

A copy of the environmental document related to the Subject Property retrieved on the DEQ ECSI database is presented in Appendix D.

Environmental reports and documents related to Parcel 1 of the Former Stimson Lumber Mill identified as Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288 (refer, Figure 3) and generally related to the Subject Property retrieved from the DEQ Environmental Cleanup Site Information (ECSI) database included:

- Final (recorded) EES.pdf
- Phase 2 Remedial Closure Report (Weston Solutions, July 2011).pdf
- NFA Recommendation Memo.pdf
- Record of Decision - Selected Remedial Action for Soil (April 2002).pdf
- Conditional No Further Action Determination (February 28, 2012).pdf

A copy of these environmental reports and documents related to Parcel 1 of the Former Stimson Lumber Mill identified as Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288 was retrieved on the DEQ ECSI database is presented in Appendix F.

Environmental reports and other documents related to the Subject Property provided by the “Public Records at DEQ” public records request portal included:

- 1965 STIMSON MILL (FORMER)_AGREE.pdf
- 1965 STIMSON MILL (FORMER)_COMM_1992-02 - 2000-07.pdf
- 1965 STIMSON MILL (FORMER)_CONCEPTUAL WORK PLAN_SOIL SAMPLING_1998-10.pdf
- 1965 STIMSON MILL (FORMER)_CON_1998-02.pdf
- 1965 STIMSON MILL (FORMER)_MAPS.pdf
- 1965 STIMSON MILL (FORMER)_PHOTOS.pdf
- 1965 STIMSON MILL (FORMER)_REPORT_DRAFT FOCUSED PARCEL 2 INVESTIGATION_1999-05.pdf
- 1965 STIMSON MILL (FORMER)_REPORT_DRAFT PHASE 2 SOIL & GW INVESTIGATION_1994-02-15.pdf
- 1965 STIMSON MILL (FORMER)_REPORT_ENVIRONMENTAL SITE ASSESS SUMMARY_1987-12-04.pdf

- 1965 STIMSON MILL (FORMER)_REPORT_FOCUSED PARCEL 2 INVESTIGATION_1999-02.pdf
- 1965 STIMSON MILL (FORMER)_REPORT_FOCUSED PARCEL 2 INVESTIGATION_1999-07-02.pdf
- 1965 STIMSON MILL (FORMER)_REPORT_PARCEL 1 RISK-BASED CORRECTIVE ACTION SOIL_2001-12-07.pdf
- 1965 STIMSON MILL (FORMER)_REPORT_PARCEL 2 FOCUSED INVESTIGATION_2000-04-19.pdf
- 1965 STIMSON MILL (FORMER)_REPORT_PHASE 3 GW INVESTIGATION_1994-07-29.pdf
- 1965 STIMSON MILL (FORMER)_REPORT_REMEDIAL SOIL EXCAVATION_1996-07-03_1.pdf
- 1965 STIMSON MILL (FORMER)_REPORT_REMEDIAL SOIL EXCAVATION_1996-07-03_2.pdf
- 1965 STIMSON MILL (FORMER)_REPORT_RESULTS OF GROUNDWATER SAMPLING & ANALYSIS_1997-06-12.pdf
- 1965 STIMSON MILL (FORMER)_SITE ASSESS.pdf
- 1965 STIMSON MILL (FORMER)_VCP STIMSON LUMBER WL_ECSI_1965.pdf

Copies of the environmental reports and other documents related to the Subject Property provided by the “Public Records at DEQ” public records request portal are presented in Appendix D.

6.1.1 Subject Property Identified as Stimson Mill (Former) | ECSI ID: 1965 – Environmental Reports and Other Documents Review and Summary

The Subject Property was listed on the DEQ ECSI database.

➤ Stimson Mill (Former) | ECSI ID: 1965

- 1795 Washington St, Oregon City, OR 97045

The DEQ ECSI database indicated that the investigative status of the Subject Property site is “No Further Action Needed;” and the action underway or needed is “No Further State Action Required.” The DEQ “No Further Action” letter dated July 6, 2000 is presented Appendix F.

The DEQ ECSI database provided the following information:

Contamination Information: "During a 1994 site investigation, Stimson's consultant found significant levels of petroleum hydrocarbons in surface and subsurface soils on several parts of the site. In addition, chlorinated VOCs and the metals iron and manganese were detected in shallow monitoring wells along the site perimeter. Stimson's consultant attributed the VOC and metals contamination in groundwater to the nearby (now closed) Rossman's Landfill (ECSI #674)."

Status of Investigative or Remedial Action: "Between October and December 1995, Stimson's consultant dug test pits to further characterize petroleum-contaminated soils, and then proceeded to excavate contaminated soils, to a depth of 3 to 6 feet. Soils contaminated with up to 23,000 ppm TPH were left in place along the west and north walls of the excavation, due to obstructions that precluded further soil removal. (8/24/98 ACV/VCP) DEQ Voluntary Cleanup Program review of site information noted data gaps: no screening of site soils for SVOCs, no off-site delineation of contamination in excavation area. Workplan requested by October 15, 1998. (4/13/99 ACV/VCP) Stimson directed site investigation in December 1998; report submitted March 1999. Elevated TPH documented in former maintenance area and 1994/1995 excavation TPH not delineated off-site. (4/18/00 ACV/VCP) Consultant evaluating groundwater to surface water (adjacent wetland) pathway. Report expected April 2000. (10/2/00 ACV/VCP) Incomplete pathway to adjacent wetland. NFA issued for site in August 2000 after public comment period."

Data Sources: "Phase III Soil and Groundwater Investigation Report, Stimson Lumber Mill Facility," SEACOR, 7/29/94; "Remedial Soil Excavation Report, Stimson Lumber Mill Facility," SEACOR, 7/3/96.

6.2 Nearby Properties – DEQ ECSI Environmental Reports and Documents List

Nearby properties (not a part of the current Subject Property) within a 0.5-mile radius of the Subject Property that were listed on the DEQ ECSI database included:

- **Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288**
 - 1757 Washington St, Oregon City, OR 97045
- **Rossman's Landfill | ECSI ID: 674**
 - 1101 17th St, Oregon City, OR 97045
- **Landeen Welding | ECSI ID: 3108**
 - 1739 Washington St, OR 97045
- **Bud's Radiator Shop | ECSI ID: 1968**
 - 1715 Washington St, Oregon City, OR 97045
- **Unpermitted Rossman Landfill PPA | ECSI ID: 1238**
 - Agness St, Oregon City, OR 97045
- **Old Rossman Landfill – South | ECSI ID: 3126**
 - Agnes St, Oregon City, OR 97045
- **Parker Pond / The Apartments | ECSI: 5138**
 - 16421 Main St, Oregon City, OR 97045
- **Clackamette Cove Area | ECSI ID: 3187**
 - 16288 Main St, Oregon City, OR 97045
- **Clackamette Cove | ECSI ID: 2301**
 - 16288 Main St, Oregon City, OR 97045
- **Al's Machine (Former) | ECSI: 2900**
 - 1608 Washington St, Oregon City, OR 97045
- **Jeff Lohr Residence | ECSI ID: 129**
 - 1206 Washington St, Oregon City, OR 97045

Additional details, and the environmental reports and/or documents presented in the DEQ ECSI database are presented below.

6.2.1 Adjoining Property Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288 – Environmental Reports and Documents

An adjoining property listed on the DEQ ECSI database located to the southwest and cross-gradient from the Subject Property was:

- **Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288**
 - 1757 Washington St, Oregon City, OR 97045

Environmental reports and documents related to Parcel 1 of the Former Stimson Lumber Mill identified as Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288 (refer, Figure 3) and generally related to the Subject Property retrieved from the DEQ Environmental Cleanup Site Information (ECSI) database included:

- Final (recorded) EES.pdf
- Phase 2 Remedial Closure Report (Weston Solutions, July 2011).pdf
- NFA Recommendation Memo.pdf
- Record of Decision - Selected Remedial Action for Soil (April 2002).pdf
- Conditional No Further Action Determination (February 28, 2012).pdf

A copy of these environmental reports and documents related to Parcel 1 of the Former Stimson Lumber Mill identified as Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288 was retrieved on the DEQ ECSI database is presented in Appendix F.

The summary information (updated 8/25/2016) for the Stimson Lumber – Parcel 1 (Former) stated:

“[Feb. 2012] DEQ has made a Conditional No Further Action decision at the site. The qualifying condition associated with the NFA is ongoing maintenance of the engineering control and institutional control designed to eliminate direct exposure to residual contamination, including diversion of stormwater to avoid its infiltration of into residual soil contamination.”

The DEQ ECSI database indicated that the investigative status of the Subject Property site is “Listed on the Confirmed Release List or Inventory;” and the action underway or needed is “No Further Action (Conditional).” The DEQ “Conditional No Further Action Determination” letter dated February 29, 2012 is presented Appendix F.

The DEQ ECSI database provided the following information:

Contamination Information: “Wood processing began at the site in the early 1960s. To prevent sap staining, employees applied an aqueous pentachlorophenol (PCP) solution to cut lumber in a dip tank area at the northeast end of Parcel 1. The tank area apparently was upgraded with a concrete liner in the 1980s. The concrete and a significant amount of underlying soil were removed in early September 1999. A 1994 Phase III investigation included 10 soil borings and the installation and sampling of five monitoring wells. Water samples from MW-2 (located near the dip tank on Parcel 1) contained PCP concentrations of 1,300 ppb. Seven direct-push groundwater samples were also collected from the dip tank area. PCP was detected at levels ranging from 0.73 to 101 ppb. A total of 36 soil samples were collected from the direct-push borings, and PCP was detected in 15 of 36, at concentrations ranging from 44 to 51,270 ppb. Based on the results of the sampling investigation, Stimson's contractor concluded PCP had impacted groundwater from contaminated soil in the dip tank area, but discounted the risk to human health based on the lack of groundwater receptors. In 1997, PCP was detected at 500 ppb in the dip tank area. Following soil removal in 1999, the level of PCP detected was 86 ppb. (4/7/00 MTP/SAP) Reevaluated March 2000. Although the majority of the PCP source material appears to have been removed, groundwater at the site has been significantly impacted, and may have been contaminated since the 1960s. The extent of soil contamination to the north of the dip tank area, and to the southwest beneath the railroad tracks, has not been fully assessed. Medium priority is appropriate.”

Pathways: “Discharge of shallow groundwater to the vulnerable wetland area and Abernethy Creek is the pathway of greatest concern at the site. Both of these areas are downgradient of the site. Other pathways of concern include inhalation/ingestion of/or direct contact with contaminated soil during future intrusive work.”

Status of Investigative or Remedial Action: “(2/8/00 MTP/SAP) Although Parcel 2 ownership was transferred to the City of Oregon City, Stimson retained the responsibility for obtaining a No Further Action (NFA) decision from DEQ. Parcel 2 (ECSI #1965) entered the Voluntary Cleanup Program (VCP) in October 1997. DEQ issued and NFA for Parcel 2 in July 2000. In June 1998, DEQ's VCP referred Parcel 1 to the Site Assessment Program (SAP) to assess elevated levels of PCP found in soil and groundwater. Based on a review of available information, DEQ's SAP determined that PCP levels in groundwater posed a threat to ecological receptors in wetlands adjacent to the site, in Abernethy Creek, and possibly in the Willamette River. SAP recommends further investigative work and completion of an Expanded Preliminary Assessment (high priority). (4/7/00 MTP/SAP) Based on information contained in a 2/12/00 Roy F. Weston report, SAP re-evaluated the site's priority, and determined it is a medium priority for completion of site characterization activities. (8/14/00 MTP/SAP) Quarterly groundwater monitoring is being conducted (MW-8, MW-9); DEQ's VCP made a no-further-action determination for the Parcel 2 site (ECSI #1965) 7/6/00. (March 2001 ACV/VCP) Stimson joined ICP. Submitted risk assessment for review in May 2001. (11/1/01 ACV/VCP) Final RA & FS comments in November 2001. Public comment period on proposed remedy (cap) due in January 2002. (ACV 4/03) Soil Remedy (cap) and deed restrictions selected (ROD) in 2002. To be implemented with redevelopment as Amtrak Station in 2003-2004. Groundwater investigation ongoing. Groundwater risk assessment expected in 2003. (October 2005) Remedy was completed under Stimson oversight and included a new Amtrak station. Final closure report has been submitted, but property was transferred to the City of Oregon City. In order to review the final report and complete the public comment process, DEQ needs to enter into an ICP agreement with the City of Oregon City. The City has not approached DEQ for the NFA.”

Data Sources: L.R. Squier Associates, Environmental Site Assessment Summary Report, 12/4/87; Squier Associates, Modified Level I Environmental Site Assessment, 2/6/92; SEACOR, Phase III Soil and Groundwater Investigation Report, 7/29/94; SECOR, Remedial Soil Excavation Report, 7/3/96; Roy F. Weston, Inc., Results of Groundwater Sampling and Analysis, Parcel 2, 6/12/97;

Roy F. Weston, Inc., Results of Soil and Groundwater Investigation, Parcel 1, 3/98;
Roy F. Weston, Inc., Remedial Soil Excavation and Groundwater Monitoring
Report Parcel 1 - Former Stimson Lumber Mill Facility, 2/00.

6.2.2 Adjoining Property Rossman's Landfill | ECSI ID: 674 – Environmental Reports and Documents

An adjoining property listed on the DEQ ECSI database located to the east and up-gradient from the Subject Property was:

- **Rossman's Landfill | ECSI ID: 674**
 - 1101 17th St, Oregon City, OR 97045

Environmental reports and documents related to Rossman's Landfill | ECSI ID: 674 (refer, Figure 3) retrieved from the DEQ ECSI database included:

- EES - OCLD Summit LLC REC 2021-065312 (01140369xC624A).pdf
- PublicNotice-PPA-Rossmans Landfill-020121.pdf
- 2016.07.01 115 RossmansLandfillPermitRenewal.pdf
- draft declaration of CCRs.pdf
- 2002 Washington St Cert of Completion DCAPDX-3636953-v1-Certification of Completion_Recorded 12.23.2.pdf
- GLUA 21-000016 NOD.pdf
- REC Environmental CCRs - for Permit Closure Reqs (01110832xC624A) revised.pdf
- REC Amendment to Environmental CCRs (Permit Closure) (01169710xC624A).pdf
- OCLD Summit PPA Consent Order (Recorded 2021-063747).pdf
- DCAPDX-3636954-v1-PPA Consent Order correction_Recorded 12.23.2020.pdf
- First Amendment to OCLD Summit Consent Order (part 1) - signed 07 16 2021.pdf
- Rossman's Landfill PPA - 674.pdf
- Rossman's Landfill Trust Fund Agreement - EXECUTED June 8, 2020.pdf
- Summit PPA-draft.pdf
- Summit PPA-Exh A-Vicinity Map.pdf
- Summit PPA-Exh B Property Legal Descriptions.pdf

- Summit PPA-Exh C Scope of Work.pdf
- Summit PPA-Exh D EES.pdf
- Summit PPA - Exh E Trust Fund Agreement.pdf
- 2002 Wash St PPA-recorded-060820.pdf
- Raging River draft SOW.pdf
- Notice of Transfer - OCLD Summit at Rossman's Landfill (part 1) - signed.pdf
- 2019-03-27-2018AEMR-Rossman'sLandfill- no appends.pdf
- Rossman Landfill map and aerial, 2009.pdf

Copies of these environmental reports and documents related to Rossman's Landfill | ECSI ID: 674 (refer, Figure 3) retrieved from the DEQ ECSI database is presented in Appendix F.

The DEQ ECSI database indicated that this site was listed in the EPA CERCLIS database with the identification of 052210150. The investigative status of this site is "Contamination Suspected;" and the action underway or needed is "Prospective Purchaser Agreement."

The DEQ ECSI database provided the following information:

General Site Description: "Comprised of eight tax lots totaling about 132.46 acres, including Tax Lots 200, 2700, 904, 801, 1200, 906, and 902 of Township 2 South / Range 2 East - Section 29 (T2S/R2E-S29), and Tax Lot 2700 of T2S/R2E-S29CA. Washington Street and the UPRR Mainline lie along most of the site's western edge. Abernethy Road lies along the site's southern boundary. Oregon Highway 212 and an unnamed tributary to Abernethy Creek lie along most of the eastern edge of the site. Apperson Boulevard lies a short distance east, beyond Highway 212. Interstate Highway 205 (I-205) generally parallels the western edge of the landfill within about 500 feet. Abernethy Creek lies about 300 feet south of Abernethy Road. The Clackamas River lies as near as 2,000 feet northwest of the landfill. Clackamette Cove, a Clackamas River inlet that was mined for gravel, lies within about 1,300 feet northwest of the landfill. Washington Street and Oregon Highway 212 cross the northern end of the landfill. Metro's Oregon City Solid Waste Transfer Station and a Home Depoe commercial building supply facility have been constructed over portions of the northern fill. A 20-acre golf driving range has been developed on a portion of the southern fill. The End of the Oregon

Trail historical interpretive center has been constructed outside the southwestern corner of the landfill. About a dozen residences are located within 0- to 700 feet of the southwest corner of the site. Park Place and the Clackamas Heights neighborhood lies just east of the site, with homes located within as near as 150 feet east of the fill."

Contamination Information: "(9/14/93 KPD/SAS) During the 1970s, Rossman's Landfill received approximately 60% of the municipal waste generated in the Portland area. The landfill was not permitted to receive hazardous waste; however, it was permitted to receive some industrial waste. Groundwater contamination from leachates was first noted in 1976. Odor problems began in early 1978. Groundwater studies in 1983 found that the City of Gladstone's backup water supply was contaminated with iron and manganese above secondary MCLs. (Gladstone's backup water supply was drawn from a shallow aquifer downgradient from the landfill; the primary water supply is drawn from an unaffected deep aquifer). Additional contaminants have been identified in the shallow aquifer directly beneath the landfill, but these contaminants have not migrated off-site. Gladstone shut down their backup water collector in 1986. A closure permit was issued for the landfill in July 1990. As part of the closure activities, an RI/FS has been performed, the landfill has been regraded, and leachate is being pumped and treated. Other sources may be responsible for the observed contamination of the shallow aquifer, including Old Rossman's Landfill (ECSI #1238)."

Manner and Time of Release: "Landfill leachate contaminating shallow aquifer; releases occurred 1969-1983."

Hazardous Substances / Waste Types: "volatile organics, heavy metals"

Status of Investigative or Remedial Action: "(9/14/93 KPD/SAS) A total of 23 monitoring wells have been installed in the area. Groundwater is monitored semiannually, and surface waters in Clackamette Lake and Abernethy Creek are also periodically monitored. The site is active in the Solid Waste Section of DEQ, and will probably remain active at least until the Closure Permit expires in the year 2000. Because off-site groundwater contamination generally only exceeds secondary water quality standards, Site Assessment does not recommend placing

the site on the Confirmed Release List (CRL) or the Inventory. (B Schwarz, 08-31-2020) A prospective purchaser agreement was recorded by Clackamas County on June 8, 2020. Under this agreement, 2002 Washington St., LLC, paid \$803,000 for closure and post-closure costs for Rossman's Landfill. A copy of the recorded PPA and the trust fund agreement are attached. DEQ is proposing to issue a Certification of Completion, following receipt of this payment. A draft of this certification is also attached. Public notice regarding this proposed certification will be published on September 1, 2020. Comments are requested by October 1, 2020. (B Schwarz, 1-29-2021) DEQ is proposing to enter into a prospective purchaser agreement with two parties planning to purchase 77 acres of the 93-acre landfill property. The portion of the landfill for acquisition is currently vacant except for a golf driving range and an area used for storage of equipment and other items. The two prospective buyers plan to redevelop the property as a retail and entertainment complex, which may include recreational facilities, hotels, retail stores, financial services, restaurants and mixed-use residential development. Summit and OCLD intend to sell or lease portions of the property to future owners or occupants. Under the agreement, the prospective buyers will fund post-closure activities including groundwater monitoring, landfill gas monitoring and operation of an existing soil vapor extraction system located on Metro's Oregon City Solid Waste Transfer Station property, if necessary. The amount of funding to be provided is still being negotiated, but is expected to exceed \$977,000."

Data Sources: 1) EPA CERCLA Preliminary Assessment. 2) EPA CERCLA Site Inspection. 3) "Decision Diamond" meeting materials. 4) Plan of Action report. 5) Sampling and Analysis Plan. 6) Laboratory Reports.

6.2.3 Adjoining Property Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288 – Environmental Reports and Documents

An adjoining property listed on the DEQ ECSI database located to the southwest and cross-gradient from the Subject Property was:

- **Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288**
 - 1757 Washington St, Oregon City, OR 97045

Environmental reports and documents related to Parcel 1 of the Former Stimson Lumber Mill identified as Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288 (refer, Figure 3) and generally related to the Subject Property retrieved from the DEQ Environmental Cleanup Site Information (ECSI) database included:

- Final (recorded) EES.pdf
- Phase 2 Remedial Closure Report (Weston Solutions, July 2011).pdf
- NFA Recommendation Memo.pdf
- Record of Decision - Selected Remedial Action for Soil (April 2002).pdf
- Conditional No Further Action Determination (February 28, 2012).pdf

A copy of these environmental reports and documents related to Parcel 1 of the Former Stimson Lumber Mill identified as Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288 was retrieved on the DEQ ECSI database is presented in Appendix F.

The summary information (updated 8/25/2016) for the Stimson Lumber – Parcel 1 (Former) stated:

“[Feb. 2012] DEQ has made a Conditional No Further Action decision at the site. The qualifying condition associated with the NFA is ongoing maintenance of the engineering control and institutional control designed to eliminate direct exposure to residual contamination, including diversion of stormwater to avoid its infiltration of into residual soil contamination.”

The DEQ ECSI database indicated that the investigative status of the Subject Property site is “Listed on the Confirmed Release List or Inventory;” and the action underway or needed is “No Further Action (Conditional).” The DEQ “Conditional No Further Action Determination” letter dated February 29, 2012 is presented Appendix F.

The DEQ ECSI database provided the following information:

Contamination Information: “Wood processing began at the site in the early 1960s. To prevent sap staining, employees applied an aqueous pentachlorophenol (PCP) solution to cut lumber in a dip tank area at the northeast end of Parcel 1. The tank area apparently was upgraded with a concrete liner in the 1980s. The concrete and a significant amount of underlying soil were removed in early September 1999. A 1994 Phase III investigation included 10 soil borings and the installation and sampling of five monitoring wells. Water samples from MW-2 (located near the dip tank on Parcel 1) contained PCP concentrations of 1,300 ppb. Seven direct-push groundwater samples were also collected from the dip tank area. PCP was detected at levels ranging from 0.73 to 101 ppb. A total of 36 soil samples were collected from the direct-push borings, and PCP was detected in 15 of 36, at concentrations ranging from 44 to 51,270 ppb. Based on the results of the sampling investigation, Stimson's contractor concluded PCP had impacted groundwater from contaminated soil in the dip tank area, but discounted the risk to human health based on the lack of groundwater receptors. In 1997, PCP was detected at 500 ppb in the dip tank area. Following soil removal in 1999, the level of PCP detected was 86 ppb. (4/7/00 MTP/SAP) Reevaluated March 2000. Although the majority of the PCP source material appears to have been removed, groundwater at the site has been significantly impacted, and may have been contaminated since the 1960s. The extent of soil contamination to the north of the dip tank area, and to the the southwest beneath the railroad tracks, has not been fully assessed. Medium priority is appropriate.”

Pathways: “Discharge of shallow groundwater to the vulnerable wetland area and Abernethy Creek is the pathway of greatest concern at the site. Both of these areas are downgradient of the site. Other pathways of concern include inhalation/ingestion of/or direct contact with contaminated soil during future intrusive work.”

Status of Investigative or Remedial Action: “(2/8/00 MTP/SAP) Although Parcel 2 ownership was transferred to the City of Oregon City, Stimson retained the responsibility for obtaining a No Further Action (NFA) decision from DEQ. Parcel

2 (ECSI #1965) entered the Voluntary Cleanup Program (VCP) in October 1997. DEQ issued and NFA for Parcel 2 in July 2000. In June 1998, DEQ's VCP referred Parcel 1 to the Site Assessment Program (SAP) to assess elevated levels of PCP found in soil and groundwater. Based on a review of available information, DEQ's SAP determined that PCP levels in groundwater posed a threat to ecological receptors in wetlands adjacent to the site, in Abernethy Creek, and possibly in the Willamette River. SAP recommends further investigative work and completion of an Expanded Preliminary Assessment (high priority). (4/7/00 MTP/SAP) Based on information contained in a 2/12/00 Roy F. Weston report, SAP re-evaluated the site's priority, and determined it is a medium priority for completion of site characterization activities. (8/14/00 MTP/SAP) Quarterly groundwater monitoring is being conducted (MW-8, MW-9); DEQ's VCP made a no-further-action determination for the Parcel 2 site (ECSI #1965) 7/6/00. (March 2001 ACV/VCP) Stimson joined ICP. Submitted risk assessment for review in May 2001. (11/1/01 ACV/VCP) Final RA & FS comments in November 2001. Public comment period on proposed remedy (cap) due in January 2002. (ACV 4/03) Soil Remedy (cap) and deed restrictions selected (ROD) in 2002. To be implemented with redevelopment as Amtrak Station in 2003-2004. Groundwater investigation ongoing. Groundwater risk assessment expected in 2003. (October 2005) Remedy was completed under Stimson oversight and included a new Amtrak station. Final closure report has been submitted, but property was transferred to the City of Oregon City. In order to review the final report and complete the public comment process, DEQ needs to enter into an ICP agreement with the City of Oregon City. The City has not approached DEQ for the NFA."

Data Sources: L.R. Squier Associates, Environmental Site Assessment Summary Report, 12/4/87; Squier Associates, Modified Level I Environmental Site Assessment, 2/6/92; SEACOR, Phase III Soil and Groundwater Investigation Report, 7/29/94; SECOR, Remedial Soil Excavation Report, 7/3/96; Roy F. Weston, Inc., Results of Groundwater Sampling and Analysis, Parcel 2, 6/12/97; Roy F. Weston, Inc., Results of Soil and Groundwater Investigation, Parcel 1, 3/98; Roy F. Weston, Inc., Remedial Soil Excavation and Groundwater Monitoring Report Parcel 1 - Former Stimson Lumber Mill Facility, 2/00.

6.2.4 Nearby Property Landeen Welding | ECSI ID: 3108 – Environmental Documents

A nearby property listed on the DEQ ECSI database located to the southwest and cross-gradient from the Subject Property was:

- **Landeen Welding | ECSI ID: 3108**
 - 1737 Washington St, Oregon City, OR 97045

Environmental documents related to Landeen Welding | ECSI ID: 3108 (refer, Figure 5) retrieved from the DEQ ECSI database included:

- Staff Report No.3108.pdf
- NFA 3108.pdf
- NFA No.3108.pdf

Copies of these environmental documents related to Landeen Welding | ECSI ID: 3108 (refer, Figure 5) retrieved from the DEQ ECSI database is presented in Appendix F.

The DEQ ECSI database indicated that the investigative status of this site is “No Further Action needed;” and the action underway or needed is “No Further State Action Required.”

The DEQ ECSI database provided the following information:

General Site Description: “The site has been a welding supply shop since about 1962. The main building on Washington St. was constructed in 1936, and housed both Landeen Tractor and Implement and the welding supply business until 1962, when the tractor business was discontinued. A second building used as a shop was constructed in the 1960s, the northernmost portion of which currently is leased by a small-scale welding business. A welding equipment repair shop affiliated with Landeen Welding supply is also located in the shop building. A waste disposal/septic service firm rents storage space in a paved yard area north of the shop building. Prior tenants included a towing business. The adjacent residence and shop to the west is Bud's Radiator (ECSI #1968).”

Contamination Information: “(7/23/01 MTP/VCP) Phase I and Phase II investigations with sampling have been conducted at the site. DEQ has not seen the Phase I report. The Phase II report focused on four potential source areas: 1)

Dry Well; 2) Soil downslope and adjacent to the parking lot near the SW edge of the property; 3) Soil in the vicinity of an abandoned hydraulic lift; 4) Septic system. Results from what appear to be a worst-case sample collected from 13 feet below ground surface (bgs) from the dry well are consistent with non-point source petroleum contamination. The sample, composed of gravel and sludge, contained 649 parts per million (ppm) total petroleum hydrocarbon (TPH) as heavy oil. Based on non-detect results for metals and volatile organic compound (VOC) analysis on the sample, there is no indication that other hazardous constituents (e.g., welding-related waste, solvents) were introduced into the dry well. Although polynuclear aromatic hydrocarbon (PAH) analysis was not conducted, it is unlikely that these TPH levels would result in significant PAH concentrations. A low concentration of trichloroethene (TCE; 1.26 parts per billion) detected in groundwater may be from an upgradient source (i.e. Rossman's Landfill, ECSI #674), and similar concentrations have been detected on the adjacent Stimson Lumber site (ECSI #2288). A relatively high level of TPH as heavy oil (11,300 ppm) was detected in a surface soil sample collected from the southwest edge of the property (S.T. Surface North). Apparently, contamination was limited to the upper 1 inch at this location, and originated as sheet flow from oil-stained parking areas that accumulated in low areas along the fence line. A sample also was collected for Toxicity Leaching Characteristic Procedure (TCLP) analysis for cadmium, chromium, and lead, which yielded non-detect results.”

Manner and Time of Release: “Sources of contamination identified through analytical testing appear to be related to non-point source runoff from automobile/equipment storage, and a leaking hydraulic ram.”

Hazardous Substances / Waste Types: “Petroleum products from leaking vehicles/equipment, and possibly underground storage tanks (USTs). Possibly metals from welding and welding fabrication.”

Pathways: “Surface soil from petroleum, subsurface soil and possibly shallow groundwater from a drywell. The site is located about 500 feet south of Abernethy Creek, which provides habitat for steelhead and coho salmon. The primary exposure pathway appears to be direct contact and/or incidental

ingestion/inhalation among site workers to total petroleum hydrocarbons and related constituents such as polynuclear aromatic hydrocarbons (PAHs) in surface soil. Direct exposure of site utility/trench workers to contaminated subsurface soil in the dry well is likely during decommissioning activities.”

Status of Investigative or Remedial Action: “(7/23/01 MTP/VCP) Enviro-Comp Inc., on behalf of Historic Properties, LLC, has proposed a soil removal for the dry well area, and in the parking lot runoff area where petroleum hydrocarbons have accumulated. DEQ reviewed the report and visited the site on July 20, 2001. DEQ prepared a memorandum summarizing site information and data gaps, which included: 1) Obtaining the Phase I report to determine that all potential contaminant sources had been evaluated; 2) Evaluating the two USTs identified at the site during the site visit; 3) Proper decommissioning of the existing dry well, and installation of the new system according to DEQ's Underground Injection Control (UIC) regulations. The soil removal and installation of the new storm water control system will be conducted in summer 2001, with DEQ oversight, within the Independent Cleanup Pathway of the Voluntary Cleanup Program.”

Data Sources: Phase II Environmental Site Assessment Report, Landeen Welding Supply, (Enviro-Comp Services, Inc., 2001).

6.2.5 Nearby Property Bud's Radiator Shop | ECSI ID: 1968 – Environmental Report and Document

A nearby property listed on the DEQ ECSI database located to the southwest and cross-gradient from the Subject Property was:

- **Bud's Radiator Shop | ECSI ID: 1968**
 - 1715 Washington St, Oregon City, OR 97045

The environmental report and document related to Bud's Radiator Shop | ECSI ID: 1968 (refer, Figure 5) retrieved from the DEQ ECSI database included:

- No.1968 staff report and NFA recommendation.pdf
- No.1968 NFA .pdf

Copies of the environmental report and document related to Bud's Radiator Shop | ECSI ID: 1968 (refer, Figure 5) retrieved from the DEQ ECSI database is presented in Appendix F.

The DEQ ECSI database indicated that this site was listed in the EPA CERCLIS database with the identification of 0002392801. The DEQ ECSI database indicated that the investigative status of this site is "No Further Action needed;" and the action underway or needed is "No Further State Action Required."

The DEQ ECSI database provided the following information:

Contamination Information: "In November 1996, the owner of the property reported that his tenant's operations had caused contamination of surface soils outside of the radiator shop and of subsurface soils and possibly groundwater via a dry well. A site visit by DEQ confirmed that the facility operator, who had run the radiator shop for about 30 years, had routinely disposed of hot-tank and other liquid wastes into a shop drain that discharged into the exterior dry well. The property owner had this drain sealed upon discovery of the contamination. A composite surface sample adjacent to the shop's bay door contained 850 mg/L TCLP lead; a sample of sludge from the catch basin leading into the dry well contained 200 mg/L TCLP lead. (GMW 10/13/97) Follow-up sampling in 1997 suggested that lead contamination may be localized around the dry well and limited to shallow soils in several areas in the south parking lot. No groundwater data has been collected."

Manner and Time of Release: "Disposal of hot-tank and radiator test-tank wastes to a dry well outside of the shop; disposal of floor sweepings from the shop onto soil/gravel outside of the shop."

Hazardous Substances / Waste Types: "Lead and other metals; possibly also petroleum hydrocarbons."

Pathways: "Site is within several hundred feet of Abernethy Creek, near its mouth into the Willamette River."

Status of Investigative or Remedial Action: "(GMW 10/13/97) A major focus of investigations performed to date has been estimating the extent of lead in soil around the dry well and south parking area. Site Assessment recommends that

owner/operators remove lead-contaminated soil in these areas. Confirmation sampling should include cadmium, copper, mercury, and VOCs, in addition to lead, since these other contaminants may have been associated with past shop operations. Recent sampling suggests that the fine-grained subsurface soils may have limited migration and prevented groundwater contamination. However, since the water table may be shallow and the dry well may act as a pipeline to groundwater, Site Assessment also recommends an evaluation of groundwater downgradient of the dry well for the presence of cadmium, copper, lead, mercury, and VOCs. Further state action at this site is a low-to-medium priority. (4/13/00 SAM/VCP) Based on work completed at the site under the guidance of DEQ's Voluntary Cleanup Program, DEQ has determined that no further action is needed."

6.2.6 Nearby Property Unpermitted Rossman Landfill PPA | ECSI ID: 1238 – Environmental Report and Document

A nearby property listed on the DEQ ECSI database located to the northwest and down-gradient from the Subject Property was:

- **Unpermitted Rossman Landfill PPA | ECSI ID: 1238**
 - Agness St, Oregon City, OR 97045

The environmental report and document related to Unpermitted Rossman Landfill PPA | ECSI ID: 1238 (refer, Figure 5) retrieved from the DEQ ECSI database included:

- No.1238 PPA .pdf
- Remedial Action Work Plan (June 2000).pdf

Copies of the environmental report and document related to Unpermitted Rossman Landfill PPA | ECSI ID: 1238 (refer, Figure 5) retrieved from the DEQ ECSI database is presented in Appendix F.

The DEQ ECSI database indicated that the investigative status of this site is "Listed on the Confirmed Release List or Inventory;" and the action underway or needed is "Remedial Action."

The DEQ ECSI database provided the following information:

Site History: “(10/8/93 KPD/SAS) Art Rossman operated a landfill from 1960 to 1969 on land previously used for agriculture. The landfill expanded as a series of trenches, with excavated soil used for cover. In 1970, a sand and gravel mining company built an asphalt plant, a ready-mix cement plant, and a stationary rock crusher near or on top of the landfill. (Sand and gravel were imported to the site by barge and truck for processing, and were then used as aggregate in the asphalt and cement plants. Process wastewaters were discharged to a settling pond north of the site.) Groundwater samples in 1987, 1989, and 1991 contained high levels of iron, manganese, and benzene.”

Contamination Information: “(8/30/01 DJP/VCP) Numerous environmental investigations have occurred at and near the Old Rossman Landfill property to assess the nature and extent of possible hazardous substances present in the solid waste, soil and groundwater at the property. These investigations identified hazardous constituents including metals, volatiles, semivolatiles, pesticides, and PCBs at low levels in groundwater sporadically throughout the footprint of the landfill. Levels of contaminants diminish rapidly in the downgradient direction (i.e., toward Clackamette Cove), and were not detected or were at very low levels in water samples from wells located outside the landfill footprint. The downgradient levels are essentially indistinguishable from the concentrations in upgradient wells with respect to typical landfill contaminants (i.e., iron and manganese), which are typical of shallow groundwater in the area. Further, the entire site vicinity has been impacted by contaminants associated with the newer, larger Rossman Landfill located east of the site. The new Rossman Landfill operated under a permit from the DEQ Solid Waste Program from 1969 to 1983 and is currently under post-closure monitoring, which has not identified unacceptable impacts to Clackamette Cove. A gasoline release occurred at the north end of the landfill property in about 1986 from an above-ground storage tank or associated piping. Several site investigations have been completed to assess impacts from the gasoline release to soil and groundwater. Soils in the release area have concentrations of benzene that display the hazardous waste characteristic by TCLP; however, no soils were found that exceed DEQ criteria for hot spots for any gasoline-related compounds. Groundwater in the source area has elevated concentrations of gasoline-related

constituents that decrease downgradient of the source area and reach non-detect levels near the property boundary.”

Manner and Time of Release: “Disposal of municipal wastes into unlined landfill from 1960 - 1969. There are impacts to site groundwater due to 1988 gasoline release & upgradient sources, including Rossman Landfill.”

Hazardous Substances / Waste Types: “Heavy metals, pesticides, gasoline (BTEX, PAHs), phthalates, chlorinated hydrocarbons, PCBs.”

Pathways: “The site was originally a marshy floodplain near the confluence of the Willamette and Clackamas Rivers. Sand and gravel mining began in the early 1950s. Excavations at the adjacent property to the west created Clackamette Lake, (now Clackamette Cove) and overburden was used to fill in the rest of the marsh. There is a local ordinance restricting the use of groundwater in the vicinity of the site, including all of the Old Rossman Landfill area (Old Rossman Landfill - South [ECSI #3126] and the area covered under the PPA [ECSI #1238]), because of impacts from the new Rossman Landfill (east of I-205). Use of groundwater is also prohibited at the Unpermitted Rossman Landfill PPA (ECSI #1238) and Clackamette Cove PPA (ECSI #2301) under the terms of their respective PPAs.”

Environmental / Threats: “Substances in shallow groundwater above MCLs (heavy metals, benzene, possibly pesticides). Contamination could threaten adjacent Clackamette Lake.”

Status of Investigative or Remedial Action: “(10/8/93 KPD/SAS) The amount of contamination caused by the landfill and other on-site activities is unclear. Several contaminants have been detected only once in three sampling events. High levels of iron and manganese are often found in marshy areas. Because any groundwater contamination may impact Clackamette Lake and other areas open to the public, Site Assessment recommends further investigation to determine the potential need for groundwater remediation. Any additional investigations should be performed under the supervision of the Voluntary Cleanup Program. (KPD/SAS) Options letter sent 5/5/94. (8/30/01 DJP/VCP) The Tri-Cities Service District (TCSD) and DEQ entered a Prospective Purchaser Agreement (PPA) to establish TCSD's responsibilities for historic releases and remedial action on the property, and their

commitment to restoring the site for public use. TCSD plans to expand its current wastewater treatment plant operations to the north end of the property in order to continue to provide for the future needs of the community. The remedial action described in the Work Plan is designed to address the specific environmental conditions at the Old Rossman Landfill property and will include the cleanup of petroleum-impacted soils and debris, and the closure and management of the solid waste landfill consistent with the U.S. Environmental Protection Agency's Presumptive Remedy for Municipal Landfills. The EPA Presumptive Remedy as implemented at the Old Rossman Landfill addresses remaining exposure pathways through a combination of capping, landfill gas collection (and treatment if necessary), and institutional and engineering controls designed to reduce or eliminate most pathways of exposure. TCSD must evaluate and appropriately manage implementation risks to protect site workers during construction of the newly configured landfill. TCSD is not responsible for, and will not be required by the State of Oregon, to perform any monitoring, investigative, or remedial activities involving groundwater. However, because groundwater contamination may impact Clackamette Cove and other areas open to the public, Site Assessment recommends further investigation to determine the potential need for groundwater remediation."

Data Sources: 1) Morrison-Knudsen Phase I, II, and III Environmental Assessment reports. 2) ERM-Rocky Mountain Property Assessment report. 3) Chen-Northern Limited Phase II Site Assessment report. 4) AGRA Environmental Assessment Report, July 1998. 5) URS Corp. Work Plan, June 2000. SEE ALSO Clackamette Cove PPA (ECSI #2301); Old Rossman Landfill - South (ECSI #3126).

6.2.7 Nearby Property Old Rossman Landfill - South | ECSI ID: 3126 – Environmental Report and Document

A nearby property listed on the DEQ ECSI database located to the northwest and down-gradient from the Subject Property was:

- **Old Rossman Landfill - South | ECSI ID: 3126**
 - Agnes St, Oregon City, OR 97045

No environmental reports or documents related to the Old Rossman Landfill | ECSI ID: 3126 (refer, Figure 7) were available on the DEQ ECSI database.

However, the DEQ ECSI database indicated that the investigative status of this site is “Contamination Suspected;” and the action underway or needed is “Remedial Investigation / Feasibility Study.”

The DEQ ECSI database provided the following information:

Contamination Information: “(10/8/93 KPD/SAS) Art Rossman operated a landfill from 1960 to 1969 on land that had previously been in agricultural use. The landfill expanded as a series of trenches, with the excavated soil used for cover. In 1970, a sand and gravel mining company constructed an asphalt plant, a ready-mix cement plant, and a stationary rock crusher near or on top of the landfill. (Sand and gravel were imported to the site by barge and truck for processing, and were then discharged to a settling pond north of the site.) Groundwater sampling in 1987, 1989, and 1991 showed high levels of iron, manganese, and benzene. Iron and manganese levels exceeded secondary MCLs and benzene exceeded primary MCLs. (9/5/01 DJP/VCP) Numerous environmental investigations have occurred near this site to assess the nature and extent of possible hazardous substances present in the solid waste, soil, and groundwater. Investigations identified hazardous constituents including metals, volatiles, semivolatiles, pesticides, and PCBs at low levels in groundwater sporadically throughout the footprint of the landfill. Levels of contaminants diminish in the downgradient direction (i.e., toward Clackamette Cove), and were not detected, or were at very low levels, in water samples from wells located outside the landfill footprint. The downgradient levels are essentially indistinguishable from concentrations in upgradient wells with respect to typical landfill contaminants (i.e., iron and manganese), and are typical of shallow groundwater in the area. Furthermore, the entire site vicinity has been impacted by contaminants associated with the newer, larger Rossman Landfill located east of the site. The new Rossman Landfill operated under a permit from the DEQ Solid Waste Program from 1969 to 1983 and is currently under post-closure monitoring. This monitoring has not identified unacceptable impacts to Clackamette Cove.”

Manner and Time of Release: “Disposal of municipal wastes into unlined landfill from 1960 - 1969.”

Hazardous Substances / Waste Types: “Municipal solid waste.”

Pathways: “The site was originally a marshy floodplain near the confluence of the Willamette and Clackamas Rivers. Sand and gravel mining began in the early 1950s. The excavations created Clackamette Lake (now Clackamette Cove), and overburden was used to fill in the rest of the marsh. There is a local ordinance restricting the use of groundwater in the vicinity of the site, including all of the Old Rossman Landfill area (Old Rossman Landfill - South [ECSI 3126] and the area covered under the PPA [ECSI 1238]), because of impacts from the new Rossman Landfill (east of I-205). Use of groundwater is also prohibited at the Unpermitted Rossman Landfill PPA (ECSI 1238) and Clackamette Cove PPA (ECSI 2301) under the terms of their respective PPAs.”

Environmental / Threats: “Substances in shallow groundwater above MCLs (heavy metals, benzene, possibly pesticides). Contamination could threaten adjacent Clackamette Lake.”

Status of Investigative or Remedial Action: “(5/5/94 KPD/SAS) The amount of contamination caused by the landfill and other on-site activities is unclear. High levels of iron and manganese are often found in marshy areas. Because any groundwater contamination may impact Clackamette Lake and other areas open to the public, Site Assessment recommends further investigation to determine the potential need for groundwater remediation. Any additional investigations should be performed under the supervision of the Voluntary Cleanup Program. (9/5/01 DJP/VCP) This portion of the former Old Rossman Landfill has not been investigated directly. However, numerous investigations in the site vicinity have documented the impacts to soil and groundwater due to the presence of solid waste material. Evaluation of historical aerial photographs, observation of solid waste during the construction of Agness Road, and observations of substantial settling on properties south of the main landfill (Tax Lot 22E20-1509), indicate that these properties are likely underlain by solid waste material. An underground storage tank decommissioning at the M&D Trucking portion of this site in 1996

documented a release of diesel from the tank (LUST log #03-96-0158). M&D's contractor removed all impacted soil from this release down to the solid waste layer. DEQ's UST Section closed its file administratively in December 2001, and referred the M&D site to the Cleanup Program for further investigation of possible diesel impacts to solid waste."

Data Sources: 1) Morrison-Knudsen Phase I, II, and III Environmental Assessment reports. 2) ERM-Rocky Mountain Property Assessment report. 3) Chen-Northern Limited Phase II Site Assessment Report. See also Clackamette Cove PPA (ECSI #2301), Clackamette Cove Area (ECSI #3126) and Unpermitted Rossman Landfill PPA (ECSI #1238).

Copies of the environmental document related to Old Rossman Landfill | ECSI ID: 3126 (refer, Figure 7), specifically M&D Trucking (LUST ID: 0396-0158) retrieved from the DEQ LUST database is presented in Appendix G.

6.2.8 Nearby Property Parker Pond / The Apartments | ECSI ID: 5138 – Environmental Reports and Documents

A nearby property listed on the DEQ ECSI database located to the west and down-gradient from the Subject Property was:

- **Parker Pond / The Apartments | ECSI ID: 5138**
 - 16421 Main St, Oregon City, OR 97045

The environmental reports and documents related to Parker Pond / The Apartments | ECSI ID: 5138 (refer, Figure 5) retrieved from the DEQ ECSI database included:

- Public notice for Parker Pond.pdf
- Prospective Purchaser Agreement (June 1, 2000).pdf
- Parker Pond PPA - 5138.pdf
- 2010-02-26-ParkerPond-feasibility-study.pdf
- Record of Decision-Parker Pond, ECSI 5138.pdf
- Staff report-Parker Pond, ECSI 5138-2014-12-19-withFigsAndAttchmnts.pdf
- Staff Report - Proposed Remedial Action (July 2010).pdf
- NFA-signed-2014-12-19.pdf
- Excised Area that was shifted to ECSI # 2301.pdf

- Phase II ESA Work Plan- The Cove at Clackamette Cove.pdf

Copies of the environmental reports and documents related to Parker Pond / The Apartments | ECSI ID: 5138 (refer, Figure 5) retrieved from the DEQ ECSI database is presented in Appendix F.

The DEQ ECSI database indicated that the investigative status of this site is "Contamination Suspected;" and the action underway or needed is "Partial No Further Action."

The DEQ ECSI database provided the following information:

Site History: "A portion of the site northeast across Main Street was excised in September of 2018 and incorporated into ECSI # 2301."

Contamination Information: "Methane gas is the primary contaminant of concern at this site. Most or all of this is from the adjacent Old Rossman's Landfill and nearby wood waste disposal areas."

Status of Investigative or Remedial Action: "(Bob Schwarz, Jan. 13, 2010) Groundwater and soil gas sampling were conducted in 2009. Elevated methane was found in soil gas. Slayden Construction intends to purchase the property after obtaining a Prospective Purchaser Agreement (PPA) from DEQ. Slayden intends to build a 220-unit apartment complex on the property consisting of ten buildings and parking at grade level. The PPA identifies safeguards to be included in the design, construction and operation of the buildings to prevent methane from entering them. (Bob Schwarz, July 6, 2010) DEQ has been informed that Slayden will likely not purchase the property. The safeguards specified in the PPA will, however, be required for any future buildings at the site. (Bob Schwarz, July 14, 2010) DEQ proposes remedial measures that involve methane venting and monitoring in future buildings. This proposal, described in the attached Record of Decision, will be submitted for public comment during the month of August 2010. The Record of Decision is based in part on a feasibility study prepared by CH2M HILL. A copy of that study is attached. (Bob Schwarz, Sept. 30, 2010) DEQ received no comments during the August public comment period. The Record of Decision was signed on Sept. 26, 2010. (Bob Schwarz, Jan. 2, 2015) Development

has still not proceeded. The current developer acknowledges that the gas mitigation measures identified in the Record of Decision will have to be addressed. In the meantime, they requested that DEQ issue a partial No Further Action determination, limited to an assessment of contaminant levels in soil and groundwater. That assessment is summarized in a December 19, 2014 staff report, attached. Based on this assessment, DEQ issued a partial No Further Action determination on Dec. 19, 2014. This NFA determination is also attached.”

6.2.9 Nearby Property Clackamette Cove Area | ECSI ID: 3187 – Environmental Reports and Documents

A nearby property listed on the DEQ ECSI database located to the west and down-gradient from the Subject Property was:

- **Clackamette Cove Area | ECSI ID: 3187**
 - 16288 Main St, Oregon City, OR 97045

No environmental reports or documents related to the Old Rossman Landfill | ECSI ID: 3126 (refer, Figure 5) were available on the DEQ ECSI database.

However, the DEQ ECSI database indicated that the investigative status of this site is “Contamination Suspected;” and the action underway or needed is “State Expanded Preliminary Assessment recommended (XPA).”

The DEQ ECSI database provided the following information:

Hazardous Substances / Waste Types: “Gasoline (BTEX, PAHs), heavy metals, asphalt, diesel and lube oil-range TPH, PAHs, have been identified on the Clackamette Cove PPA site (ECSI #2301). Similar operations have occurred at the Clackamette Cove Area site.”

Pathways: “The site was originally a marshy floodplain near the confluence of the Willamette and Clackamas Rivers. Sand and gravel mining began in the early 1950s. The excavations created Clackamette Lake (now Clackamette Cove), and overburden was used to fill in the rest of the marsh. A local ordinance restricts groundwater use in the vicinity of the site (including all of the Clackamette Cove Area), because of impacts from the Rossman's Landfill. Use of groundwater at the Clackamette Cove PPA site is also prohibited under the terms of the PPA.

Groundwater migrating from the site discharges to the Cove or to the Clackamas River. Contaminants of concern have not been detected in water samples collected from the Cove shoreline.”

Environmental / Threats: “Contaminants originating at the Old Rossman Landfill and new Rossman Landfill (located east of I-205) have impacted shallow groundwater beneath the site. Contamination could threaten adjacent Clackamette Cove. Contaminants associated with site use for aggregate operations (and associated settling ponds at north end of site) could include heavy metals and heavy-range petroleum.”

Status of Investigative or Remedial Action: “((11/1/01 DJP/VCP) The Clackamette Cove Area (CCA) occupies 64 acres in Oregon City between an abandoned landfill to the east (Old Rossman Landfill) and the Clackamas River to the west. The Oregon City Shopping Center lies immediately south of the site, and the Tri-Cities Service District's wastewater treatment facility is present to the north. Further east of the site are Interstate 205 and the new Rossman's Landfill. The City of Oregon City entered into a Prospective Purchaser Agreement (PPA) with DEQ prior to purchasing a portion of the Clackamette Cove Area property, in order to establish its liability for historic releases, and for contaminants known to be impacting the site (Clackamette Cove PPA) from off-site sources. The City plans to develop the Clackamette Cove PPA site for recreational, residential, and commercial use. The CCA was used for agricultural production until the mid-1950s, when Pit Rock Products began mining sand and gravel and the production of concrete and asphalt began. As mining continued, first a lake and finally a cove was created when the lake was joined to the Clackamas River in the 1960s. After the cove was opened, sand and gravel were barged to the cove, and quarrying at the site ended. The area immediately east of the site was used as a shallow, unlined landfill from 1960 to 1969. In 1971, the sand and gravel operation was extended from the CCA to this property by Kline Sand & Gravel. The entire operation was purchased by Western Pacific Construction Materials in 1972. A release of gasoline occurred at the north end of this property in the mid-1980s. The property owners declared bankruptcy in late 1986, although Lonestar, Inc. reportedly continued site operations on both properties into the early 1990s. The

property has largely been vacant since. Several environmental investigations have been completed at the CCA and the adjacent property to the east. The City of Oregon City completed an investigation of soil, groundwater, and nearshore sediments along with a detailed documentation of site use in preparation for entrance into the PPA with DEQ. Collectively, these investigations have documented the presence of soil and groundwater contamination that has resulted both from site use and groundwater migration from off-site. Contaminants resulting from site use include moderate levels of diesel/lube oil-range petroleum, arsenic, and lead in soils around the former asphalt batch plants. Moderate levels of heavy oil-range petroleum were also found in some shallow sediment samples collected along the eastern cove shoreline. Contaminants migrating in shallow groundwater from off-site include chlorinated solvents, arsenic, lead, and typical landfill constituents such as iron and manganese. Petroleum hydrocarbons have migrated to the north end of the property from the large gasoline release that occurred at the adjacent property.”

Data Sources: 1) Morrison-Knudsen Phase I, II, and III Environmental Assessment Reports; 2) ERM-Rocky Mountain Property Assessment report; 3) Chen-Northern Limited Phase II Site Assessment Report; 4) AGI Technologies, Inc. July 1998.

6.2.10 Nearby Property Clackamette Cove | ECSI ID: 2301 – Environmental Reports and Documents

A nearby property listed on the DEQ ECSI database located to the west and down-gradient from the Subject Property was:

- **Clackamette Cove | ECSI ID: 2301**
 - 16288 Main St, Oregon City, OR 97045

The environmental report and document related to Clackamette Cove | ECSI ID: 2301 (refer, Figure 5) retrieved from the DEQ ECSI database included:

- Clackamette Cove PPA-1998-12-03.pdf
- Excised portion from ECSI # 5138.pdf

Copies of the environmental report and document related to Clackamette Cove | ECSI ID: 2301 (refer, Figure 5) retrieved from the DEQ ECSI database is presented in Appendix F.

The DEQ ECSI database indicated that the investigative status of this site is “Listed on the Confirmed Release List or Inventory;” and the action underway or needed is “Remedial Action.”

The DEQ ECSI database provided the following information:

General Site Description: “The Clackamette Cove Area (CCA) occupies 64 acres in Oregon City between an abandoned landfill to the east (Old Rossman Landfill) and the Clackamas River to the west. The Oregon City Shopping Center lies immediately south of the site, and the Tri-Cities Service District's wastewater treatment facility is north of the site. Further east of the site are Interstate 205 and the new Rossman's Landfill.”

Site History: “The City of Oregon City signed a Prospective Purchaser Agreement (PPA) with DEQ prior to purchasing a portion of the Clackamette Cove Area property, in order to establish its liability for historic releases, and for contaminants known to be impacting the site (Clackamette Cove PPA) from off-site sources. The City plans to develop the Clackamette Cove PPA site for recreational, residential, and commercial use. The CCA was used for agricultural production until the mid-1950s, when Pit Rock Products began mining sand and gravel and the production of concrete and asphalt began. As mining continued, first a lake and finally a cove was created when the lake was joined to the Clackamas River in the 1960s. After the cove was opened, sand and gravel were barged to the cove, and quarrying at the site ended. The area immediately east of the site was used as a shallow, unlined landfill from 1960 to 1969. In 1971, the sand and gravel operation was extended from the CCA to this property by Kline Sand & Gravel. The entire operation was purchased by Western Pacific Construction Materials in 1972. A known release of gasoline occurred at the north end of this property in the mid-1980s. The property owners declared bankruptcy in late 1986, although Lonestar, Inc. reportedly continued site operations on both properties into the early 1990s. The property has largely been vacant since.”

Contamination Information: “(11/1/01 DJP/VCP) Several environmental investigations have been completed at the CCA and the adjacent property to the east. The City of Oregon City completed an investigation of soil, groundwater, and nearshore sediments along with a detailed documentation of site use in preparation for entrance into the PPA with DEQ. Collectively, these investigations have documented the presence of soil and groundwater contamination that has resulted both from site use and groundwater migration from off-site. Contaminants resulting from site use include moderate levels of diesel/lube oil-range petroleum, arsenic, and lead in soils around the former asphalt batch plants. Moderate levels of heavy oil-range petroleum were also found in some shallow sediment samples collected along the eastern cove shoreline. Contaminants migrating in shallow groundwater from off-site include chlorinated solvents, arsenic, lead, and typical landfill constituents such as iron and manganese. Petroleum hydrocarbons have migrated to the north end of the property from the large gasoline release that occurred at the adjacent property.”

Hazardous Substances / Waste Types: “Gasoline (BTEX, PAHs), heavy metals, asphalt, diesel & lube oil-range TPH, PAHs, chlorinated hydrocarbons.”

Pathways: “The site was originally a marshy floodplain near the confluence of the Willamette and Clackamas Rivers. Sand and gravel mining began in the early 1950s. The excavations created Clackamette Lake (now Clackamette Cove), and overburden was used to fill in the rest of the marsh. The most significant risk associated with the contaminants identified to date would be from exposure to contaminated soils. The City of Oregon City has agreed to conduct additional investigation(s) and perform cleanup or other remedial measures prior to allowing access to the Clackamette Cove PPA site. If cleanup or other measures are prohibitively expensive, the City may choose to control exposure by restricting access to all or portions of the site. There is a local ordinance restricting groundwater use in the site vicinity (including all of the Clackamette Cove Area), because of impacts from the Rossman's Landfill. Use of groundwater at the Clackamette Cove PPA site is also prohibited under the terms of the PPA. Groundwater migrating from the site discharges to the cove or to the Clackamas River. The contaminants of concern have not been detected in water samples

collected from the cove shoreline. If there is reason to believe that conditions have changed, or new contaminants are identified that suggest an unacceptable risk posed by site groundwater, the City has agreed to allow DEQ (or others) access to the Clackamette Cove PPA site for investigative or remedial action.”

Environmental / Threats: “Substances in shallow groundwater above drinking-water levels (heavy metals, benzene, possibly pesticides). Contamination could threaten adjacent Clackamette Lake.”

Status of Investigative or Remedial Action: “(11/1/01 DJP/VCP) Site requires listing on DEQ's Confirmed Release List and Inventory, due to the need for long-term controls to protect human health and the environment. (July 1, 2010, Bob Schwarz) A Prospective Purchaser Agreement (PPA) between DEQ and the Oregon City Urban Renewal Agency for the Clackamette Cove property was executed December 3, 1998. A copy is attached. Because development was postponed, DEQ has had very little involvement with the site since that time. We have been informed, however, that development may take place in the near future. The PPA identified certain requirements and conditions, the status of which are summarized below.

Soils. The PPA required remedial or removal actions, as approved by DEQ and consistent with the City's use for the Property, for the arsenic contaminated soils located in area 5 on the Property. DEQ determined that arsenic in soil has been adequately addressed.

Sediments. An investigation of sediments in the adjacent waters of the Cove was assessed by Ash Creek Associates. The results of the study did not identify any contaminants that would restrict recreational use of the Clackamette Cove water body.

Groundwater. As stated in the PPA, the City is not responsible for investigation or remediation of groundwater at the Property. To be sure that groundwater does not pose a threat, the City adopted Ordinance No. 94-1022, prohibiting well drilling in the Cove area without first consulting with DEQ.

During design and construction of buildings and related structures, DEQ will require documentation ensuring that safeguards are included to mitigate possible remaining contamination.

Based on investigations at nearby parcels, DEQ is particularly interested in the possible presence of volatile organic compounds and landfill gases that may originate in the nearby Old Rossman's Landfill and other nearby waste disposal sites."

Data Sources: 1) Morrison-Knudsen Phase I, II, and III Environmental Assessment Reports; 2) ERM-Rocky Mountain Property Assessment report; 3) Chen-Northern Limited Phase II Site Assessment report. 4) AGI Technologies, Inc., July 1998. SEE ALSO Old Rossman's Landfill ECSI #1238.

6.2.11 Nearby Property Al's Machine (Former) | ECSI ID: 2900 – Environmental Document

A nearby property listed on the DEQ ECSI database located to the southwest and cross-gradient from the Subject Property was:

- **Al's Machine (Former) | ECSI ID: 2900**
 - 1608 Washington St, Oregon City, OR 97045

The environmental document related to Al's Machine (Former) | ECSI ID: 2900 (refer, Figure 5) retrieved from the DEQ ECSI database included:

- NFA No.2900.pdf

A copy of the environmental document (a "No Further Action" letter, dated November 2, 2000) related to Al's Machine (Former) | ECSI ID: 2900 (refer, Figure 5) retrieved from the DEQ ECSI database is presented in Appendix F.

The DEQ ECSI database indicated that the investigative status of this site is "No Further Action Needed;" and the action underway or needed is "No Further State Action Required."

The DEQ ECSI database provided the following information:

Contamination Information: "(9/8/00) Total lead in groundwater grab sample 0.021 to 0.119 ppm. Dissolved lead below detection limit. Total lead and TCLP lead in soil below detection limit."

Hazardous Substances / Waste Types: “Lead”

Status of Investigative or Remedial Action: “(11/2/00) Joined DEQ's Independent Cleanup Pathway (ICP) Program in September 2000. Based upon available information for the property, DEQ determined residual contaminants are not present at actionable concentrations. No Further Action (NFA) determination issued November 2, 2000.”

6.2.12 Nearby Property Jeff Lohr Residence | ECSI ID: 129 – Environmental Document

A nearby property listed on the DEQ ECSI database located to the southwest and cross-gradient from the Subject Property was:

- **Jeff Lohr Residence | ECSI ID: 129**
 - 1206 Washington St, Oregon City, OR 97045

The environmental document related to Jeff Lohr Residence | ECSI ID: 129 (refer, Figure 5) retrieved from the DEQ ECSI database included:

- #129 - No Further Action Determination (August 6, 2001).pdf

A copy of the environmental document related to Jeff Lohr Residence | ECSI ID: 129 (refer, Figure 5) retrieved from the DEQ ECSI database is presented in Appendix F.

The DEQ ECSI database indicated that the investigative status of this site is “No Further Action Needed;” and the action underway or needed is “No Further State Action Required.”

The DEQ ECSI database provided the following information:

General Site Description: “This is a private residence located near the east corner of 12th and Washington Streets in Oregon City. Washington St. slopes strongly downward to the northeast. 12th St. slopes strongly downward to the southwest. The area is primarily residential, with a few commercial businesses. Barclay Elementary School lies 2 blocks to the southeast. Oregon City Hospital lies 2 blocks to the southwest.”

Contamination Information: “Jeff Lohr stored drums containing PCB-contaminated oil on his property. He evidently worked for Portland General Electric Company, and obtained the oil at work. The drums were marked '2,4,5-T', and

contained oil with up to 94 ppm PCBs; they leaked oil onto the ground; Portland General Electric Company removed PCB-contaminated soils near the house in July 1987. Pre-cleanup samples were collected at 6 to 12 inches depth; Depth of post-cleanup samples is unclear; cleanup confirmation samples collected in July 1987 indicate that remaining subsurface soils contained PCBs at concentrations above human health concerns - up to 5.4 ppm PCBs. There is no indication that any additional soils were removed. Oil was also reportedly used for dust suppression in an alley that was subsequently paved and/or oiled; there is no record to indicate that soils along the alley were sampled or otherwise evaluated. DEQ conducted follow-up sampling 5/2/01. Testing results from the property, alley, and adjacent property showed PCB levels below DEQ's residential cleanup standard of 1.2 ppm total PCBs."

Manner and Time of Release: "Leaking drums; also, oil reportedly used for dust suppression in alley. Time of release: 7/15/87."

Hazardous Substances / Waste Types: "PCBs, oil."

Status of Investigative or Remedial Action: "PGE removed some PCB-contaminated soils at the site in July 1987, although confirmation samples collected after the removal indicate that remaining subsurface PCB concentrations may pose threats to residents (no indication of subsequent removals). (6/21/01 BAG/SRP) Based on the results of a DEQ investigation on the property, no further action (NFA) is proposed for the site. A public notice will be published in July 2001. If no comments are received, DEQ will issue a NFA decision and remove the property from the Confirmed Release List (CRL). (6/24/02 BAG/SRP) NFA is complete; site has been removed from the CRL."

Data Sources: Spill File lab results NWR spill report, correspondence from PGE. ECSI File.

7.0 HISTORICAL USE INFORMATION

Reasonably ascertainable historical documents were reviewed for the Subject Property.

7.1 Subject Property – Summary Historical Uses

The Subject Property was currently observed to be occupied and operated as a commercial landscape supply distribution company identified as “Clackamas Landscape Supply, Inc”. The Subject Property appeared to be occupied by one (1) mobile trailer type building structure used as an office and dispatch area; one (1) display type shed structure; one (1) small vehicle and equipment maintenance supply shed used to store maintenance petroleum products, and one (1) semi-trailer used for general storage and as a general maintenance work shop. None of these structures were built on permanent foundations.

A general summary of historical uses of the Subject Property is presented below. Note that the summary was developed from assessment of potentially partial and/or unclear information from historical topographic maps and/or historical aerial photographs.

DATES	USE	SOURCES
From before 1890 until before 1914	Vacant open fields or potentially agricultural fields.	Historical Topographic Maps
From 1914 until 1936	Mostly agricultural fields and a building structure on the northeastern end of the Subject Property.	Historical Topographic Maps Historical Aerial Photographs
From 1936 until 1948	Some agricultural and mostly open fields, and a building structure on the central eastern side of the Subject Property.	Historical Topographic Maps Historical Aerial Photographs
From 1948 until 1952	Mostly open fields, a building structure on the southern of the Subject Property, and some storage of materials on the central portion of the Subject Property.	Historical Topographic Maps Historical Aerial Photographs

From 1952 until 1955	Mostly open fields, a building structure on the southern of the Subject Property, and some storage of materials on the central portion of the Subject Property.	Historical Topographic Maps Historical Aerial Photographs
From 1955 until 1960	Mostly open fields, a building structure on the southern portion of the Subject Property, and more intensive usage and storage of materials on the central and southwestern portions of the Subject Property.	Historical Topographic Maps Historical Aerial Photographs
From 1960 until 1970	A large L-shaped building structure on the southern portion of the Subject Property, and intensive usage of the property as a lumber mill.	Historical Topographic Maps Historical Aerial Photographs
From 1970 until 1975	A large L-shaped building structure on the southern portion of the Subject Property, and intensive usage of the property as a lumber mill.	Historical Topographic Maps Historical Aerial Photographs
From 1975 until 1981	A large L-shaped building structure on the southern portion of the Subject Property, and intensive usage of the property as a lumber mill.	Historical Topographic Maps Historical Aerial Photographs
From 1981 until 1994	The large L-shaped building structure on the southern portion of the Subject Property appear to have been razed, the property appeared to be in the process of being cleared, and the Former Lumber Mill no longer appeared to be present.	Historical Topographic Maps Historical Aerial Photographs

From 1994 until 2000	The Subject Property appeared to have been cleared and grubbed, some portions of the cleared areas appeared to be used for the storage of materials, and the Former Lumber Mill no longer appeared to be present.	Historical Topographic Maps Historical Aerial Photographs
From 2000 until 2006	The Subject Property appeared to have been cleared and grubbed, and the majority of the property appeared to be occupied and operated as the current commercial landscape supply distribution company.	Historical Topographic Maps Historical Aerial Photographs
From 2006 until 2020	The Subject Property appeared to be occupied and operated as the current commercial landscape supply distribution company.	Historical Topographic Maps Historical Aerial Photographs

The boundaries of the Subject Property, neighboring properties, and select property details are presented on Figure 2. The locations and descriptions of the Subject Property and site features are presented on Figures 5 and 6.

The EDR historical topographic maps report and the EDR Decade Aerial Photo Package are presented in Appendix H and Appendix I, respectively.

7.2 Historical Topographic Maps – Subject Property and Adjoining Properties

EW reviewed historical topographic maps obtained from EDR of the Subject Property and surrounding area. Eleven (11) historical USGS topographic maps (dated 1914, 1939, 1941, 1954, 1961, 1970, 1975 [partial], 1984 - 1985, 2014, 2017, and 2020) were included in the EDR report for the Subject Property.

LOCATION	DESCRIPTION
Subject Property	<p>The Subject Property appeared to be located within a generally rural and later more industrial area just northeast of the Oregon City downtown area from before 1914 through the present. No building structures were depicted in the 1914, 1939, or 1941 topographic maps. One building structure appeared to be depicted in the 1954 and 1961 topographic maps. The large L-shaped building structure and another building structure appeared to be depicted on the 1970 and 1984-1985 topographic maps. And, no building structure were depicted in the 2014, 2017, and 2020 topographic maps. A small intermittent stream appeared to cross the northern mid-section of the Subject property from before 1914 until before 1954.</p>
Northwest of Subject Property	<p>The area to the northwest of the Subject Property appeared to be located within a generally rural and later more industrial area just northeast of the Oregon City downtown area from before 1914 through the present. Two parallel railroad tracks appeared to be depicted in the 1914, 1939, 1941, 1954, 1961, and 1970 topographic maps. Of these two railroad tracks, the western railroad track was identified as "Portland Traction" and the eastern railroad track was identified as "Southern Pacific." The "Portland Traction" railroad tracks appeared to have been removed prior to 1984-1985, and the "Southern Pacific" or AMTRAC railroad track is present and currently in use. In addition, the excavation of Clackamette Cove appeared to be had begun between 1954 and 1961, and likely completed prior to 1970.</p>
North of Subject Property	<p>The area to the north of the Subject Property appeared to be located within a generally rural and later more industrial area just northeast of the Oregon City downtown area from before 1914 through the present. The "Southern Pacific" railroad track appeared to be present from before 1914 to the present.</p>

Northeast and East	The area to the northeast and east of the Subject Property appeared to be located within a generally rural and later more industrial area just northeast of the Oregon City downtown area from before 1914 through the present. Two (2) small ponds and a small intermittent stream appeared to be present from before 1914 until before 1939, then only one (1) small pond and a small intermittent stream appeared to be present from before 1939 until before 1954, then only one (1) small pond appeared to be present from before 1954 until before 1984-1985 when the pond area appeared to be a wetland. The pond and wetland area appeared to no longer be present from before 2014 to the present.
Southeast and South	The areas to the southeast and south of the Subject Property appeared to be located within a generally rural and later more industrial area just northeast of the Oregon City downtown area from before 1914 through the present. Some residential type building structures appeared to be present from before 1914 until before 1939 when a sports venue appeared to have been built ("Kelley Field"). The sports venue appeared to be present from before 1939 until before 2014.
Southwest	The area to the southwest of the Subject Property appeared to be located within a generally rural and later more industrial area just northeast of the Oregon City downtown area from before 1914 through the present. Some residential type building structures appeared to be present from before 1914 until the present, and some commercial type building structures appeared to be present from before 1954 to the present.

Features related to potential environmental concerns (e.g. pits, landfills, quarries, oil-fields, etc.) were not specifically observed on the historical topographic maps. The EDR historical topographic maps report is included in Appendix H. However, note that other information within this report did indicate the likely historic presence of landfills, quarries, a gasoline station, wetlands, and other features of potential environmental concern were located within the near vicinity of the Subject Property.

In addition, note that properties within the City of Portland and Oregon City areas have historically used and continue to use underground HOT(s) for heating purposes. Building structures (including residences, commercial building structures, industrial building structures, and other structures) may have or historically had underground heating oil tanks.

7.3 Historical Aerial Photographs – Subject Property and Adjoining Properties

EW reviewed historical aerial photographs obtained from EDR of the Subject Property and surrounding area. Fifteen (15) historical aerial photographs, dated 1936, 1948, 1952, 1955, 1960, 1970, 1975, 1981, 1994, 2000, 2006, 2009, 2012, 2016, and 2020 were included in the EDR Decade Aerial Photo Package for the Subject Property. Note that assessment of the aerial photos may not be accurate due to the quality and/or coverage of the images reviewed.

LOCATION	DESCRIPTION
Subject Property	Mostly agricultural fields and a building structure at the northeastern end of the Subject Property (1936). Mostly agricultural and open fields (1948). Mostly open fields, a building structure on the southern of the Subject Property, and some storage of materials on the central portion of the Subject Property (1952, 1955). More intensive usage and storage of materials on the central and southwestern portions of the Subject Property (1960). A large L-shaped building structure on the southern portion of the Subject Property, and intensive usage of the property as a lumber mill (1970, 1975, 1981). The large L-shaped building structure on the southern portion of the Subject Property appear to have been razed, the property appeared to be in the process of being cleared, and the Former Lumber Mill no longer appeared to be present (1994). The Subject Property appeared to have been cleared and grubbed, some portions of the cleared areas appeared to be used for the storage of materials, and the Former Lumber Mill no longer appeared to be present (2000). The Subject Property appeared to be

	occupied and operated as the current commercial landscape supply distribution company (2006, 2009, 2012, 2016, 2020).
Northwest of Subject Property	<p>The area to the northwest of the Subject Property appeared to be mostly agricultural fields with two (2) generally parallel railroad tracks aligned north-northeast and south-southwest.(1936, 1948, 1952, 1955).</p> <p>The excavation of Clackamette Cove appeared to had begun (1960).</p> <p>The excavation of Clackamette Cove appeared to had been completed, Highway 205 appeared to have begun construction (1970), and industrial and/or commercial buildings appeared to have been developed (1970, 1975, 1981, 1994, 2000, 2006, 2009, 2012, 2016). Multi-family residential units appeared to have been developed (2020).</p>
North of Subject Property	<p>The area to the north of the Subject Property appeared to be mostly agricultural fields with a railroad track aligned north-northeast and south-southwest some residences (1936, 1948, 1952, 1955, 1960).</p> <p>Highway 205 appeared to have begun construction (1970), and industrial and/or commercial development with stacked logs appeared to have begun (1970, 1975, 1981). The Metro South Transfer Station appeared to have been constructed (1994). Large stacks of logs appear to have been removed (1994). The area to the north appeared to be generally industrial and/or commercial (2000, 2006, 2009, 2012, 2016, 2020)</p>
Northeast and East	<p>The area to the northeast and east of the Subject Property appeared to be mostly agricultural fields with two (2) small ponds (1936, 1948, 1952, 1955, 1960). The area appeared to have been developed for some commercial, industrial, and/or landfill use (1970, 1975, 1981) The landfill appeared to have been covered (1994). The area appeared to have been re-developed for mostly commercial (including a golf center) and/or industrial uses (2000, 2006, 2009, 2012, 2016, 2020).</p>

Southeast and South	<p>The area to the southeast and south of the Subject Property appeared to include a large sports venue (“Kelley Field”), agricultural fields, commercial and/or industrial building structures, and residences (1936, 1948, 1952, 1955, 1960). More commercial and/or industrial buildings appeared to have been developments (1970, 1975, 1981, 1994, 2000, 2006, 2009, 2012, 2016, 2020).</p> <p>The End of the Oregon Trail Interpretive Center appeared to have been developed on the site of “Kelley Field” (2000).</p>
Southwest	<p>The area to the southwest of the Subject Property appeared to include agricultural fields, commercial and/or industrial building structures, and residences (1936, 1948, 1952, 1955, 1960). More commercial and/or industrial buildings appeared to have been developments and residential buildings appeared to have been razed (1970, 1975, 1981, 1994, 2000, 2006, 2009, 2012, 2016, 2020).</p>

Building structures (including residences, commercial building structures, industrial building structures, and other structures) may have or historically had underground heating oil tanks. The EDR Decade Aerial Photo Package is included in Appendix I.

An aerial photo view of the Subject property and neighboring properties from PortlandMaps are presented on Figure 2 and Figure 4.

7.4 Historical City Directories – Subject Property and Adjoining Properties

EW contracted EDR to provide a collection of EDR listings from select historical city directories for the Subject Property and nearby properties. EDR searched available directories from sources such as Haines, InfoUSA, Polk, Cole, Bresser, and Stewart.

SUBJECT PROPERTY

LOCATION	DESCRIPTIONS
Subject Property	<p><u>1799 Washington St</u> – No EDR listings were identified for this Subject Property address.</p> <p><u>1795 Washington St (also historically included the southwest adjoining properties identified as 1757 Washington St and 1743 Washington St [see below])</u> – Publishers Paper (Log Stge) (1974), Publishers Paper (Saw Mill) (1979), Publishers Paper (Saw Mill) (1984), R S G Forest Products Inc saw mill (1987), Stimson Lumber Co (1992), Oregon Chamber of Commerce (1995), Clackamas Sand & Gravel (2000), Clackamas Landscape (2014), Clackamas Landscape Supply (2014), Clackamas Landscape Supply (2017), Clackamas Landscape Supply Inc (2020).</p>

NEIGHBORING PROPERTIES

RELATIVE LOCATION	PARCEL ADDRESS	DESCRIPTIONS
Southwest	1757 Washington St	AMTRAK STATIONORC (2014), AMTRAK-ORC (2020), Coasters Crossing (2020).
Southwest	1743 Washington St	No EDR listings were identified for this address.
Southwest	1729 Washington St Also 1715, 1721, 1723, 1725, 1737 Washington St	<p><u>1729 Washington St</u> – Warren's Body Shop (1974, 1979), Landeen Wldg Sup (Whse) (1984, 1987), TG Pallet (2005), T G Pallet Repair (2010, 2020).</p> <p><u>Also 1715 Washington St</u> – Buds Radiator Repair (1974, 1979, 1984), Buds Radiator</p>

		<p>Repair repr (1987), Buds Radiator rpar (1992), Buds Radiator Repair (1995, 2000), Hopps Upholstery (2014, 2017, 2020), Jay Hopp (2020).</p> <p><u>Also 1721 Washington St</u> – Economy Top Shop (1974), Short (1979), Smitty's Upholstery (1984, 1987, 1992), American Medical Resp (2010), C & A Inprints (2017), Del Sol Racks (2020).</p> <p><u>Also 1723 Washington St</u> – Vacant (1974), Lane Orin D (1979), Gurkin Horace E II (1984, 1987), Aaberg, Ron (2000), Wilson, Michael R (2005), Kellies Dog House (2010, 2014, 2017), Totally Unique Beauty Boutique (2020).</p> <p><u>Also 1725 Washington St</u> – Harry's Auto Shop (1964), Bob & Don's Body and Paint Shop (1974), Chuck's Transmission repr (1979), J & S Body Shop auto reprs (1984), Gorski Auto auto rprs (1987), Window Tinting Too (1992), State of the Art Body & Paint (1995, 2000, 2005, 2010, 2014, 2017, 2020), 24 Hour Oregon City Locksmith (2014, 2017).</p> <p><u>Also 1737 Washington St</u> – Century Marine marine sups (1974), Landeen Medical Gases & Equipment (1974, 1984, 1987), Landeen Wlding Supplies Inc (1974), Landeen Welding Supplies Inc (1984, 1987), All Gas Products (1992, 2000), Landeen Med Gas (1992), Landeen Welding SP (1992), Landeen</p>
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		Welding Supplies Inc (1995), Air Liquide Oregon City Store (2000), Landeen Welding Supplies Incorporated (2000), Air Liquide America Corp / Landeen (2005), Maverick Welding Supplies Inc (2005, 2014), Western Cylinder Supply (2005), Air Liquide America Corp LNDN (2010), Air Liquide (2014, 2017).
South	1726 Washington St Also 1756 Washington St	<u>1726 Washington St</u> – Kelly Athletic Field playgrounds (1974, 1979), Kelly Athletic Field (playgrounds) (1984, 1987), Oregon Trail Foundation Incorporated The (2000), Oregon Trail Interpretive Center (2000), Oregon Trail Pageant (2000), End of the Oregon Trail (2005), Oregon Trail Interpretive Center (2005), Clackamas Heritage Partners (2014, 2017, 2020), The Oregon Trail Foundation Inc (2017), End of the Oregon Foundation Inc Historic (2020), Oregon Trail Foundation Inc (2020). <u>1756 Washington St</u> – No EDR directories listings were provided for this address.
Southeast	1780 Washington St	Kay's Phillips (1974), Lackner Kay & Sons (1979), Stein Oil Chevron Station (1984, 1987), United Bus (West Linn Div) (1984), No Return (1987), Auto Technics Repr (1992, 1995), Stein Oil Co Inc (1992), Stein Oil Co (1995), Automotive Repair Central (2000), Stein Oil Company Incorporated Stein Service Stations (2000), Artic Beverage Gases (2005), Stein Oil (2005), Stark Street

		Lawn & Garden (2010), Stark Street Lawn & Garden Inc (2010), Stark Street Lawn & Garden Oregon (2014, 2017), Stark Street Lawn & Garden (2020).
Southeast	1810 Washington St	Sandpiper Restaurant (1974), Terry's Burgers & Fish (1979), Terry's Burgers & Fish restr (1984, 1987), Terrys Burger&Fish (1992), Terrys Burger & Fish (1995), Chamber of Commerce (2000), Oregon City Chamber of Commerce (2005), Oregonian (2010), OBEC Consulting Engineers OBEC Office (2014).
East	1105 Abernathy Rd (aka 1101 17th St) Also 1107 Abernathy Rd	<u>1105 Abernathy Rd</u> – Canby Sand & Gravel Co (2005), Molalla Quarries (2005), Parker Northwest Paving (2005), Canby Sand & Gravel Co (2010), ParkerNorthwest Paving Co (2010). <u>Also: 1107 Abernathy Rd</u> – Trails End Golf Center (2005, 2010, 2014, 2017), Austin Landis Golf LLC (2020), Birdie Finish Golf (2020), BirdieFinish Inc (2020), Trails End Golf CTR (2020). <u>1101 17th St</u> – Rossman's Landfill Inc garbage collectors (1974, 1979), Rossman's Landfill Inc (1984), Parker Development trash receptacles (1987).
East-Northeast	2002 Washington St	3 Catz Espresso Café (2005), Home Depot (2010), The Home Depot (2014), Hampton Locksmith (2017), Home Services at the Home Depot (2017), Penske Truck Rental

		(2017), The Home Depot (2017), Home Depot (2020), Home Services at Home Depot (2020), Penske Truck Rental (2020).
Northeast	2001 Washington St	Jack Gray Transport (1992), Jack Gray Trnsprt (1992), Metro So Stn (1992), Metro South Statn (1992), Metro South Station (1995), Waste Management Inc (1995), Browning Ferris Industries (2000), Gray Jack Transport (2000), Metro South Station (2000), Metro South Transfer Station (2000), Specialty Transport Services Incorporated (2000), BFI Waste Systems of N America (2005), BrowningFerris Inds ORE (2005), Metro South Transfer Station (2005), Metro Transfer StationSouth (2010), Browningferris Industries (2014, 2017), Metro South Transfer Station (2017), Metro South Transfer Station (2020), Recology (2020), Republic Services (2020).
North-Northwest	16300 Agnes Ave	No EDR directories listings were provided for this address.
North-Northwest	16320 Agnes Ave	No EDR directories listings were provided for this address.
West	1913 Main St	No EDR directories listings were provided for this address.

Select directories listings for select addresses (noted above) did indicate the historic presence of a landfill, a municipal transfer station, a gravel quarry, a gasoline station, auto repair facilities and shops, an upholstery shop, residential and commercial buildings likely associated with HOTs and/or underground storage tanks (USTs), and other types of

businesses with potential environmental concerns. The EDR-City Directory Image Report is presented in Appendix J.

7.5 Historical Sanborn Fire Insurance Maps – Subject Property and Adjoining Properties

Sanborn Fire Insurance maps were developed in the late 1800s and early 1900s for use as an assessment tool for fire insurance rates in urbanized areas. EW contracted EDR to provide Historical Sanborn Fire Insurance Maps of the Subject Property and adjoining properties.

EDR indicated that the Sanborn Library were searched and no historical Sanborn Fire Insurance Maps were found for the Subject Property and adjoining properties. The EDR Certified Sanborn Map Report is included in Appendix K.

7.6 Building Permit Report – Subject Property and Adjoining Properties

EW contracted EDR to provide EDR listings of Building Permit Reports for building department records related to indications for environmental conditions. The building permit records can be used to identify current and/or former operations and structures/features of potential environmental concern. The data can provide information on the Subject Property and adjoining properties such as the presence of underground storage tanks, above-ground storage tanks, pump islands, sumps, drywells, etc., as well as information regarding water, sewer, natural gas, electrical connection dates, and current/former septic tanks.

LOCATION	DESCRIPTION
Subject Property	<u>1799 Washington St</u> – Several building permits related to a noise and light alarm, electric circuits and feeders, a new manufactured building structure, and “service at old stud mill” were identified. None of these building permits appeared to be related to potential environmental concerns.
Southwest	No building permits were identified.
South	No building permits were identified.

Southeast	<p><u>1780 Washington St</u> – Several building permits related to a water service, electrical inspection, sanitary line, building canopy, island card readers, modular trailer office, electric change tanks, electrical protective signaling, BP Station circuits, fuel dispenser installs, gas dispenser and card reader plan reviews, BP sign, and historic conversions were identified. Select building permits appeared to be related to the operation of gasoline station and may be a potential environmental concern.</p> <p><u>1810 Washington St</u> – Several building permits related to a plumbing backflow device, electrical illumination, service to temporary job trailers, demo of vacant building, and electrical service and circuits were identified. None of these building permits appeared to be related to potential environmental concerns.</p>
East	No building permits were identified in the EDR Building Permits Report.
Northeast	No building permits were identified in the EDR Building Permits Report.
North	No building permits were identified in the EDR Building Permits Report.
Northwest	No building permits were identified in the EDR Building Permits Report.
West	No building permits were identified in the EDR Building Permits Report.

The EDR Building Permit Report is presented in Appendix L.

7.7 Property Tax Map Report – Subject Property and Adjoining Properties

EW contracted EDR to provide EDR listings of Property Tax Map Reports for available tax maps, which include information on boundaries for the Subject Property and adjoining properties, addresses, and parcel identification numbers. The EDR Property Tax Map Report indicated that there was no coverage for Property Tax Map Reports. The EDR Property Tax Map Report is presented in Appendix M.

However, a search of the City of Oregon City - TaxMap Finder online application (<https://www.orcity.org/403/Taxmap-Finder>) provided a copy of a Tax Map for the Subject Property and Neighboring properties. A copy of the City of Oregon City tax map is presented in Appendix M.

Note that additional information regarding property boundaries, addresses, and parcel identification numbers can also be found in the Clackamas County parcel property information database (<https://cmap.clackamas.us/maps>) and the PortlandMaps parcel property information database (<https://www.portlandmaps.com>).

8.0 RECORDS REVIEW

8.1 Federal / State / Tribal / Local Environmental Databases Review

EW contracted EDR to conduct a search of federal, state, tribal, and local environmental records databases within the AMSD from the Subject Property to identified sites of interest or concern, as specified in ASTM Standard E 1527-13 and E1527-21, that indicated known and/or suspected environmental issues.

All the EDR listed sites in the environmental regulatory records databases within the AMSD presented in the EDR Summary Radius Map Report and the EDR Radius Map Report with GeoCheck® were reviewed. The EDR Summary Radius Map Report and the EDR Radius Map Report with GeoCheck® are presented in Appendix N.

The details of the EDR listed sites that appeared to be potential RECs for the Subject Property were further reviewed and assessed to determine whether the EDR listed site was a REC for the Subject Property using the following criteria:

- 1) If the EDR listed site only held an operating permit (which does not imply a release);
- 2) If the EDR listed site had completed cleanup activities and had been granted a “No Further Action” designation by the appropriate regulatory agency;
- 3) The historic uses of the EDR listed site; and
- 4) The location of the EDR listed site relative to the Subject Property in regards to distance, topography, and/or groundwater flow direction.

Summary details of select EDR listed sites identified as potential RECs and/or RECs for the Subject Property located within a 0.4-mile radius of the Subject Property are presented below.

Note that select EDR listed sites were identified on the OR ECSI database. These OR ECSI sites identified within a 0.5-mile radius of the Subject Property included:

- Stimson Mill (Former) | ECSI ID: 1965
- Stimson Lumber – Parcel 1 (Former) | ECSI ID: 2288
- Rossman’s Landfill | ECSI ID: 674
- Landeen Welding | ECSI ID: 3108
- Bud’s Radiator Shop | ECSI ID: 1968
- Unpermitted Rossman Landfill | ECSI ID: 1238
- Old Rossman Landfill – South | ECSI ID: 3126
- Parker Pond / The Apartments | ECSI: 5138
- Clackamette Cove | ECSI ID: 2301
- Clackamette Cove Area | ECSI ID: 3187
- Al’s Machine (Former) | ECSI ID: 2900
- Jeff Lohr Residence | ECSI ID: 129

These OR ECSI sites were previously presented and discussed in detail in Section 6 of this report.

8.1.1 Subject Property – EDR Listed Sites

The details of the Subject Property used during the review of the EDR listed sites and the environmental regulatory records databases are presented below.

<p><u>Subject Property – Historical Names:</u></p> <ul style="list-style-type: none"> - Stimson Mill (Former) - Stimson Mill Company - Stimson Lumber Company - Stimson Mill Former
<p><u>Subject Property – Addresses (Current and Historical):</u></p> <ul style="list-style-type: none"> - 1799 Washington St, Oregon City, OR 97045 - 1795 Washington St, Oregon City, OR 97045

The identified EDR listed sites of interest or concern located at the Subject Property during the review of the EDR Summary Radius Map Report and the EDR Radius Map Report with GeoCheck® are presented below.

Database: OR RGA HWS
Site Name: STIMSON MILL (FORMER) (EDR ID: A1 and A2); and STIMSON MILL - FORMER (EDR ID: A4)
Address: 1795 Washington St, Oregon City, OR 97045
Distance: NA - Subject Property
Direction: NA - Subject Property
<p>Comments:</p> <p>The STIMSON MILL (FORMER) (EDR ID: A1 and A2) site (Subject Property) and the STIMSON MILL - FORMER (EDR ID: A4) site (Subject Property) were identified on the Oregon Recovered Government Archive State Hazardous Waste Facilities (OR RGA HWS) database as a Hazardous Waste Facility from 1997 through 2012.</p> <ul style="list-style-type: none"> Based on the research information, the location as the subject property, and the historical site uses; the STIMSON MILL (FORMER) (EDR ID: A1 and A2) site (Subject Property) and the STIMSON MILL - FORMER (EDR ID: A4) site (Subject Property) represents a potential REC for the Subject Property.

Database(s): OR ECSI, OR VCS, RCRA NonGen / NLR, FINDS, ECHO, OR NPDES
Site Name: STIMSON LUMBER COMPANY (EDR ID: A3)
Address: 1795 Washington St, Oregon City, OR 97045
Distance: NA - Subject Property
Direction: NA - Subject Property
<p>Comments:</p> <p>The STIMSON LUMBER COMPANY (EDR ID: A3) site (Subject Property) was identified on the Oregon Environmental Cleanup Site Information (ECSI) System database with an Oregon ECSI identification (ID) number of 1965; on the Oregon (OR) Voluntary Cleanup Program Sites (VCS) database with an identification of ORD987171907; on the Resource Conservation Recovery Act (RCRA) Non Generator / No Longer Regulated database; on the United States (US) Facility Index</p>

System/Facility Registry System (FINDS) database; US Enforcement & Compliance History Information (ECHO) database; and the OR Wastewater Permit Database (OR NPDES).

Review of the ECSI database general site information (<https://www.deq.state.or.us/Webdocs/Forms/Output/>) indicated that the STIMSON LUMBER COMPANY | (EDR ID: A3) site aka STIMSON MILL (FORMER) | ECSI ID: 1965 (Subject Property) has an investigative status of “No Further Action needed” and Action Underway or Needed designation of “No Further State Action Required.” Additional details presented in the ECSI database of the STIMSON LUMBER COMPANY | (EDR ID: A3) site (Subject Property) were presented in Section 6.0 of this report.

A copy of the DEQ “No Further Action” letter (2000-07-06 DEQ No Further Action ltr.pdf), dated July 6, 2000 is presented in Appendix C.

- Based on the research information, the location as the subject property, the historical site uses, and the investigative status of “No Further Action needed” and Action Underway or Needed designation of “No Further State Action Required;” the STIMSON LUMBER COMPANY | (EDR ID: A3) site (Subject Property) represents a potential REC for the Subject Property.

The EDR Summary Radius Map Report and the EDR Radius Map Report with GeoCheck® are presented in Appendix N.

8.1.2 Select Adjoining and Nearby Properties – EDR Listed Sites

Select identified EDR listed sites of interest or concern located adjoining or nearby (within 0.4-mile) the Subject Property during the review of the EDR Summary Radius Map Report and the EDR Radius Map Report with GeoCheck® are presented below.

Database: ECSI, CRL, ENG CONTROLS, INST CONTROL, VCS
Site Name: STIMSON LUMBER – PARCEL 1 (FORMER) (EDR ID: 5)
Address: 1757 Washington St, Oregon City, OR 97045
Distance: 27-ft or 0.005-mile (Adjoining Property)
Direction: Southwest (cross-gradient from Subject Property.)

Comments:

The STIMSON LUMBER – PARCEL 1 (FORMER) | (EDR ID: 5) site (southwest adjoining property) was identified on the ECSI system database with a ECSI ID number of 2288; on the OR Confirmed Release List and Inventory (CRL); on the OR Engineering Controls Recorded at ECSI Sites (ENG CONTROLS) database; on the OR Institutional Controls Recorded at ECSI Sites (INST CONTROL) database; and on the OR VCS database.

Review of the ECSI database general site information (<https://www.deq.state.or.us/Webdocs/Forms/Output/>) indicated that the STIMSON LUMBER – PARCEL 1 (FORMER) | (EDR ID: 5) site (southwest adjoining property) has an investigative status of “Listed on the Confirmed Release List or Inventory” and Action Underway or Needed designation of “No Further Action (Conditional).” Additional details presented in the ECSI database of the STIMSON LUMBER – PARCEL 1 (FORMER) | (EDR ID: 5) site (southwest adjoining property) were presented in Section 6.0 of this report.

A copy of the DEQ “Conditional No Further Action Determination” letter (Conditional No Further Action Determination (February 28, 2012).pdf), dated February 28, 2012 is presented in Appendix F (*Folder/ Stimson Parcel 1_ECSI-2288*).

- Based on the research information, the proximity of this EDR listed site, the cross-gradient location relative to the Subject Property, the investigative status of “Listed on the Confirmed Release List or Inventory” and Action Underway or Needed designation of “No Further Action (Conditional),” and the presence of engineering and institutional controls; the STIMSON LUMBER – PARCEL 1 (FORMER) | (EDR ID: 5) site (southwest adjoining property) represents a REC for the Subject Property.

Database: ECSI, AST, VCS, HAZMAT, HSIS, OR UIC

Site Name: MAVERICK WELDING SUPPLIES INC (EDR ID: B6)
Address: 1737 Washington St, Oregon City, OR 97045
Distance: 235-ft or 0.045-mile (Nearby Property)
Direction: South-Southwest (cross-gradient from Subject Property.)
<p>Comments:</p> <p>The MAVERICK WELDING SUPPLIES INC (EDR ID: B6) site (southwest nearby property) was identified on the ECSI system database with a ECSI ID number of 3108; on the OR Aboveground Storage Tanks (AST) database; on the OR VCS database; on the OR Hazmat/Incidents (HAZMAT); on the OR Hazardous Substance Information Survey (HSIS) database; and on the OR Underground Injection Control Program Database (UIC).</p> <p>Note that the ECSI database identified the MAVERICK WELDING SUPPLIES INC (EDR ID: B6) site (southwest nearby property) as “Landeem Welding (ECSI Site ID: 3108).” Review of the ECSI database general site information (https://www.deq.state.or.us/Webdocs/Forms/Output/) indicated that the MAVERICK WELDING SUPPLIES INC (EDR ID: B6) site (southwest nearby property) has an investigative status of “No Further Action needed” and Action Underway or Needed designation of “No Further State Action Required.” Additional details presented in the ECSI database of the MAVERICK WELDING SUPPLIES INC (EDR ID: B6) site (southwest nearby property) were presented in Section 6.0 of this report.</p> <ul style="list-style-type: none"> Based on the research information, the proximity of this EDR listed site, the cross-gradient location relative to the Subject Property, the investigative status of “No Further Action needed” and Action Underway or Needed designation of “No Further State Action Required;” the MAVERICK WELDING SUPPLIES INC (EDR ID: B6) site (southwest nearby property) represents a potential REC for the Subject Property.

Database: MINES MRDS

<p>Site Name: WILLAMETTE HI-GRADE CONCRETE CO (EDR ID: C7) WILLAMETTE HI-GRADE CONCRETE CO (EDR ID: C8) FRANCIS WELSH SILICA MINE (EDR ID: C13) FRANCIS WELSH SILICA MINE (EDR ID: C14)</p>
<p>Address: No Addresses Provided</p> <p>However, likely located at 1105 Abernathy Rd, Oregon City, OR 97045</p>
<p>Distance: EDR ID: C7 => 242-ft or 0.046-mile (Nearby Property)</p> <p>EDR ID: C8 => 255-ft or 0.048-mile (Nearby Property)</p> <p>EDR ID: C13 => 428-ft or 0.081-mile (Nearby Property)</p> <p>EDR ID: C14 => 438-ft or 0.081-mile (Nearby Property)</p>
<p>Direction: EDR ID: C7 => Southeast (up-gradient from Subject Property.)</p> <p>EDR ID: C8 => Southeast (up-gradient from Subject Property.)</p> <p>EDR ID: C13 => South-Southeast (up-gradient from Subject Property.)</p> <p>EDR ID: C14 => South-Southeast (up-gradient from Subject Property.)</p>
<p>Comments:</p> <p>The WILLAMETTE HI-GRADE CONCRETE CO (EDR ID: C7), WILLAMETTE HI-GRADE CONCRETE CO (EDR ID: C8), FRANCIS WELSH SILICA MINE (EDR ID: C13), and the FRANCIS WELSH SILICA MINE (EDR ID: C14) sites (likely southeast and south-southeast adjoining property) were identified on the US Mineral Resources Data System (MINES MRDS) database with MRDS ID numbers of OR01707 and OR05131.</p> <ul style="list-style-type: none"> Based on the research information, the proximity of these EDR listed sites, the up-gradient locations relative to the Subject Property, and the potential environmental concerns related to mining operations; the WILLAMETTE HI-GRADE CONCRETE CO (EDR ID: C7), WILLAMETTE HI-GRADE CONCRETE CO (EDR ID: C8), FRANCIS WELSH SILICA MINE (EDR ID: C13), and the FRANCIS WELSH SILICA MINE (EDR ID: C14) sites (likely southeast and south-southeast adjoining property) represents a potential REC for the Subject Property.

Database: OR LUST, OR UST OR AST, FINDS, and/or OR HAZMAT
<p>Site Name: KELLY FIELD CARDLOCK (EDR ID: C9)</p> <p>STEIN OIL/KELLY FIELD (EDR ID: C11)</p> <p>SMITTY'S UPHOLSTERY (EDR ID: B12)</p> <p>OREGON CITY PLANT (EDR ID: D19)</p> <p>FORMER M & D TRUCKING SITE (EDR ID: D21)</p> <p>LONE STAR NORTHWEST (EDR ID: D24)</p> <p>KNAPP, HAROLD (EDR ID: 25)</p> <p>CLACKAMAS COUNTY D.T.D. (EDR ID: E27)</p> <p>CLACKAMAS COUNTY D.T.D. (EDR ID: E28)</p> <p>OREGON CITY PUBLIC WORKS (EDR ID: G33)</p> <p>PACIFIC PAPER TRADING CO (EDR ID: H40)</p> <p>HEATING OIL TANK (EDR ID: I41)</p> <p>CHAMBERLAIN, PATRICIA (EDR ID: 42)</p> <p>HEATING OIL TANK (EDR ID: 43)</p> <p>INSURANCE PROPERTIES (EDR ID: I44)</p> <p>HEATING OIL TANK (EDR ID: I45)</p> <p>FIRESTONE 3555 FULLER MOBIL GAS (EDR ID: 46)</p> <p>SPORTCRAFT LANDING PUBLIC PARKING (EDR ID: 47)</p> <p>BUCK MEDICAL SERVICES (EDR ID: 50)</p> <p>CASCADE OIL (EDR ID: 51)</p> <p>TRI-CITY SEWAGE TREATMENT PLANT (EDR ID: K52)</p> <p>HEATING OIL TANK (EDR ID: L53)</p> <p>HEATING OIL TANK (EDR ID: M54)</p>
<p>Address: EDR ID: C9 => 1780 ½ WASHINGTON ST</p> <p>EDR ID: C11 => 1780 WASHINGTON ST</p> <p>EDR ID: B12 => 1721 WASHINGTON ST</p> <p>EDR ID: D19 => 16288 MAIN ST</p> <p>EDR ID: D21 => 16300 MAIN ST (likely on south adjoining property to 15941 Agnes Ave, Oregon City, OR 97045)</p> <p>EDR ID: D24 => 16381 MAIN ST</p>

EDR ID: 25 => 1707 WASHINGTON ST
 EDR ID: E27 => 902 ABERNATHY RD
 EDR ID: E28 => 902 ABERNATHY RD
 EDR ID: G33 => 1623 JOHN ADAMS ST
 EDR ID: H40 => 215 16TH ST
 EDR ID: I41 => 15TH & WASHINGTON
 EDR ID: 42 => 1513 MONROE ST
 EDR ID: 43 => 819 15TH STREET
 EDR ID: I44 => 1423 WASHINGTON ST
 EDR ID: I45 => 606 15TH STREET
 EDR ID: 46 => 123 OREGON CITY SHOPPING CENTER
 EDR ID: 47 => 1701 CLACKAMETTE DR
 EDR ID: 50 => 1401 WASHINGTON ST
 EDR ID: 51 => 13645 S HOLCOMB BOULEVARD
 EDR ID: K52 => 15991 S AGNES RD
 EDR ID: L53 => 1202 16TH ST
 EDR ID: M54 => 212 14TH ST

Distance: EDR ID: C9 => 357-ft or 0.068-mile (Nearby Property)
 EDR ID: C11 => 357-ft or 0.068-mile (Nearby Property)
 EDR ID: B12 => 380-ft or 0.072-mile (Nearby Property)
 EDR ID: D19 => 564-ft or 0.107-mile (Nearby Property)
 EDR ID: D21 => 618-ft or 0.117-mile (Nearby Property)
 EDR ID: D24 => 687-ft or 0.130-mile (Nearby Property)
 EDR ID: 25 => 728-ft or 0.138-mile (Nearby Property)
 EDR ID: E27 => 932-ft or 0.177-mile (Nearby Property)
 EDR ID: E28 => 932-ft or 0.177-mile (Nearby Property)
 EDR ID: G33 => 1,011-ft or 0.191-mile (Nearby Property)
 EDR ID: H40 => 1,316-ft or 0.249-mile (Nearby Property)
 EDR ID: I41 => 1,674-ft or 0.317-mile (Nearby Property)
 EDR ID: 42 => 1,692-ft or 0.320-mile (Nearby Property)
 EDR ID: 43 => 1,715-ft or 0.325-mile (Nearby Property)
 EDR ID: I44 => 1,720-ft or 0.326-mile (Nearby Property)

EDR ID: I45 => 1,746-ft or 0.331-mile (Nearby Property)
EDR ID: 46 => 1,806-ft or 0.342-mile (Nearby Property)
EDR ID: 47 => 1,846-ft or 0.350-mile (Nearby Property)
EDR ID: 50 => 1,944-ft or 0.368-mile (Nearby Property)
EDR ID: 51 => 2,037-ft or 0.386-mile (Nearby Property)
EDR ID: K52 => 2,037-ft or 0.368-mile (Nearby Property)
EDR ID: L53 => 2,102-ft or 0.398-mile (Nearby Property)
EDR ID: M54 => 2,113-ft or 0.400-mile (Nearby Property)

Direction: EDR ID: C9 => South-Southeast (up-gradient from Subject Property.)
EDR ID: C11 => South-Southeast (cross-gradient from Subject Property.)
EDR ID: B12 => South-Southwest (cross-gradient from Subject Property.)
EDR ID: D19 => Northwest (down-gradient from Subject Property.)
EDR ID: D21 => Northwest (down-gradient from Subject Property.)
EDR ID: D24 => Northwest (down-gradient from Subject Property.)
EDR ID: 25 => Southwest (cross-gradient from Subject Property.)
EDR ID: E27 => South (cross-gradient from Subject Property.)
EDR ID: E28 => South (cross-gradient from Subject Property.)
EDR ID: G33 => South-Southwest (cross-gradient from Subject Property.)
EDR ID: H40 => Southwest (cross-gradient from Subject Property.)
EDR ID: I41 => Southwest (cross-gradient from Subject Property.)
EDR ID: 42 => South-Southwest (cross-gradient from Subject Property.)
EDR ID: 43 => South-Southwest (cross-gradient from Subject Property.)
EDR ID: I44 => Southwest (cross-gradient from Subject Property.)
EDR ID: I45 => Southwest (cross-gradient from Subject Property.)
EDR ID: 46 => West-Northwest (down-gradient from Subject Property.)
EDR ID: 47 => West-Southwest (down-gradient from Subject Property.)
EDR ID: 50 => Southwest (cross-gradient from Subject Property.)
EDR ID: 51 => East-Southeast (up-gradient from Subject Property.)
EDR ID: K52 => North-Northeast (cross-gradient from Subject Property.)
EDR ID: L53 => South (cross-gradient from Subject Property.)
EDR ID: M54 => Southwest (cross-gradient from Subject Property.)

Comments:

The KELLY FIELD CARDLOCK | (EDR ID: C9), STEIN OIL/KELLY FIELD | (EDR ID: C11), SMITTY'S UPHOLSTERY | (EDR ID: B12), OREGON CITY PLANT | (EDR ID: D19), FORMER M & D TRUCKING SITE | (EDR ID: D21), LONE STAR NORTHWEST | (EDR ID: D24), KNAP, HAROLD | (EDR ID: 25), CLACKAMAS COUNTY D.T.D. | (EDR ID: E27), CLACKAMAS COUNTY D.T.D. | (EDR ID: E28), OREGON CITY PUBLIC WORKS | (EDR ID: G33), PACIFIC PAPER TRADING CO | (EDR ID: H40), HEATING OIL TANK | (EDR ID: I41), CHAMBERLAIN, PATRICIA | (EDR ID: 42), HEATING OIL TANK | (EDR ID: 43), INSURANCE PROPERTIES | (EDR ID: I44), HEATING OIL TANK | (EDR ID: I45), FIRESTONE 3555 FULLER MOBIL GAS | (EDR ID: 46), SPORTCRAFT LANDING PUBLIC PARKING | (EDR ID: 47), BUCK MEDICAL SERVICES | (EDR ID: 50), CASCADE OIL | (EDR ID: 51), TRI-CITY SEWAGE TREATMENT PLANT | (EDR ID: K52), HEATING OIL TANK | (EDR ID: L53), and HEATING OIL TANK | (EDR ID: M54) sites were identified on the OR Leaking Underground Storage Tank Database (OR LUST), the OR Underground Storage Tank Database (OR UST), the OR Aboveground Storage Tank (OR AST) database, the US Facility Index System/Facility Registry System (FINDS) database, and/or the OR HAZMAT database. The OR LUST database indicated that the EDR listed site had "Cleanup Completed;" and the OR UST database indicated that all the EDR listed site had "Decommissioned" their tanks. Note that multiple Aboveground Storage Tanks (ASTs) may be in operation at the CLACKAMAS COUNTY D.T.D. | (EDR ID: E28) site with annual inspections.

- Based on the research information, the proximity of these EDR listed sites, the locations relative to the Subject Property, the OR LUST database indicating that all the EDR listed site had "Cleanup Completed" [with the exception of HEATING OIL TANK | (EDR ID: L53)], and/or the OR UST database indicating that all the EDR listed site had "Decommissioned" their tanks; these EDR listed sites **do not represent a REC** for the Subject Property.

Copies of select environmental documents retrieved from the DEQ LUST database is presented in Appendix G.

Database: EDR Hist Auto
Site Name: AUTO TECHNICS AUTOMOTIVE (EDR ID: C10)
Address: "1780 WASH" However, likely located at 1780 Washington St, Oregon City, OR 97045 Note that based on the address, this site is probably related to the KELLY FIELD CARDLOCK (EDR ID: C9) and the STEIN OIL/KELLY FIELD (EDR ID: C11) sites.
Distance: 357-ft or 0.068-mile (Nearby Property)
Direction: South-Southeast (up-gradient from Subject Property.)
Comments: The AUTO TECHNICS AUTOMOTIVE (EDR ID: C10) site (south-southeast adjoining property) was identified during the EDR search for Historic Auto station within a national collection of business directories. <ul style="list-style-type: none"> Based on the research information, the proximity of this EDR listed site, the up-gradient locations relative to the Subject Property, and the potential environmental concerns related to historic automotive stations; the AUTO TECHNICS AUTOMOTIVE (EDR ID: C10) site (south-southeast adjoining property) <u>represents a potential REC</u> for the Subject Property.

Database: SEMS-ARCHIVE, ECHO, RCRA NonGen / NLR, FINDS, OR ECSI, OR VCP, OR MANIFEST, OR UIC
Site Names: BUDS RADIATOR SHOP (EDR ID: B15) BUDS RADIATOR (EDR ID: B16) BUD'S RADIATOR SHOP (EDR ID: B17)
Address: 1715 Washington St, Oregon City, OR 97045
Distance: 456-ft or 0.086-mile (Nearby Property)
Direction: South-Southwest (cross-gradient from Subject Property.)

Comments:

The BUDS RADIATOR SHOP | (EDR ID: B15), BUDS RADIATOR | (EDR ID: B16), and BUD'S RADIATOR SHOP | (EDR ID: B17) sites (southwest nearby property) was identified on the US Superfund Enterprise Management System Archive (SEMS-ARCHIVE) database, on the US ECHO database, on the US RCRA NonGen / NLR database, on the US FINDS database, on the ECSI system database with a ECSI ID number of 1968, on the OR VCP (aka VCS) database, on the OR Manifest Information (OR MANIFEST), and/or on the OR UIC database.

Note that the ECSI database identified the BUD'S RADIATOR SHOP | (EDR ID: B17) site (southwest nearby property) as "Bud's Radiator Shop (ECSI Site ID: 1968)." Review of the ECSI database general site information (<https://www.deq.state.or.us/Webdocs/Forms/Output/>) indicated that the BUD'S RADIATOR SHOP | (EDR ID: B17) site (southwest nearby property) has an investigative status of "No Further Action needed" and Action Underway or Needed designation of "No Further State Action Required." Additional details presented in the ECSI database of the BUD'S RADIATOR SHOP | (EDR ID: B17) site (southwest nearby property) were presented in Section 6.0 of this report.

A copy of the DEQ "No Further Action Determination" letter (No.1968 NFA.pdf), dated April 13, 2000 is presented in Appendix F (*Folder/Bud's Radiator_ECSI-1968*).

- Based on the research information, the proximity of this EDR listed site, the cross-gradient location relative to the Subject Property, the investigative status of "No Further Action needed" and Action Underway or Needed designation of "No Further State Action Required;" the BUDS RADIATOR SHOP | (EDR ID: B15), BUDS RADIATOR | (EDR ID: B16), and BUD'S RADIATOR SHOP | (EDR ID: B17) sites (southwest nearby property) **does not represent a REC** for the Subject Property.

Database: PFAS ECHO, RCRA NonGen / NLR, OR MANIFEST, RCRA-VSQQ, FINDS, ECHO, OR SWF/LF, OR AST, OR SPILLS, OR HAZMAT, OR NPDES, PADS, CA HAZNET, RCRA-SQG
Site Name: METRO SOUTH STATION (EDR ID: 18) PLIBRICO SALES & SERVICE INC (EDR ID: D22) GLACIER NORTHWEST INC CONCRETE PLANT (EDR ID: D23) CLACKAMAS COUNTY MAINTENANCE&#8206 (EDR ID: E26) NW NATURAL PIPELINE AT ROSSMAN LANDFILL (EDR ID: F29) METRO SOUTH TRANSFER STATION (EDR ID: F30) METRO SOUTH STATION (EDR ID: F31) NW NATURAL PIPELINE AT ROSSMAN LANDFILL (EDR ID: F32) HOME DEPOT NO 4017 (EDR ID: 36) BUMP PARLOR INC (EDR ID: 38) WYMORE TRANDFER STATION (EDR ID: H39)
Address: EDR ID: 18 => No Address (likely 2001 Washington St) EDR ID: D22 => 16320 SE Main St EDR ID: D23 => 16381 S Main St EDR ID: E26 => 902 Abernathy Road EDR ID: F29 => 200 ft S of 2001 Washington St EDR ID: F30 => 2001 Washington St EDR ID: F31 => 2001 Washington St EDR ID: F32 => 200 ft S of 2001 Washington St EDR ID: 36 => 2002 Washington St EDR ID: 38 => 1601 Washington St EDR ID: H39 => 215 16 th St
Distance: EDR ID: 18 => 547-ft or 0.104-mile (Nearby Property) EDR ID: D22 => 632-ft or 0.120-mile (Nearby Property) EDR ID: D23 => 637-ft or 0.130-mile (Nearby Property) EDR ID: E26 => 932-ft or 0.177-mile (Nearby Property) EDR ID: F29 => 1,003-ft or 0.190-mile (Nearby Property) EDR ID: F30 => 1,003-ft or 0.190-mile (Nearby Property) EDR ID: F31 => 1,003-ft or 0.190-mile (Nearby Property)

<p>EDR ID: F32 => 1,003-ft or 0.190-mile (Nearby Property)</p> <p>EDR ID: 36 => 1,119-ft or 0.212-mile (Nearby Property)</p> <p>EDR ID: 38 => 1,283-ft or 0.243-mile (Nearby Property)</p> <p>EDR ID: H39 => 1,316-ft or 0.249-mile (Nearby Property)</p>
<p>Direction: EDR ID: 18 => Northeast (cross-gradient from Subject Property.)</p> <p>EDR ID: D22 => Northwest (down-gradient from Subject Property.)</p> <p>EDR ID: D23 => Northwest (down-gradient from Subject Property.)</p> <p>EDR ID: E26 => South (cross and up-gradient from Subject Property.)</p> <p>EDR ID: F29 => Northeast (cross-gradient from Subject Property.)</p> <p>EDR ID: F30 => Northeast (cross-gradient from Subject Property.)</p> <p>EDR ID: F31 => Northeast (cross-gradient from Subject Property.)</p> <p>EDR ID: F32 => Northeast (cross-gradient from Subject Property.)</p> <p>EDR ID: 36 => East-Northeast (up-gradient from Subject Property.)</p> <p>EDR ID: 38 => Southwest (cross-gradient from Subject Property.)</p> <p>EDR ID: H39 => Southwest (cross-gradient from Subject Property.)</p>
<p>Comments:</p> <p>The METRO SOUTH STATION (EDR ID: 18), PLIBRICO SALES & SERVICE INC (EDR ID: D22), GLACIER NORTHWEST INC CONCRETE PLANT (EDR ID: D23), CLACKAMAS COUNTY MAINTENANCE&#8206 (EDR ID: E26), NW NATURAL PIPELINE AT ROSSMAN LANDFILL (EDR ID: F29), METRO SOUTH TRANSFER STATION (EDR ID: F30), METRO SOUTH STATION (EDR ID: F31), NW NATURAL PIPELINE AT ROSSMAN LANDFILL (EDR ID: F32), HOME DEPOT NO 4017 (EDR ID: 36), BUMP PARLOR INC (EDR ID: 38), and WYMORE TRANDFER STATION (EDR ID: H39) sites were identified on the US Facilities in Industries that May Be Handling PFAS Listings (PFAS ECHO) database, on the RCRA NonGen / NLR database, on the OR MANIFEST database, on the RCRA – Very Small Quantity Generators (Formerly Conditional) (RCRA-VSQG) database, on the FINDS database, on the ECHO database, on the OR Solid Waste Facilities List (SWF/LF) database, on the OR AST database, on the OR Spill Data (SPILLS) database, on the OR HAZMAT database, on the OR NPDES database, on the US PCB Activity Database System</p>

(PADS) database, on the Facility and Manifest Data (HAZNET) database, and/or on the RCRA – Small Quantity Generators (RCRA-SQG) database.

- Based on the research information, the proximity of these EDR listed sites, the locations relative to the Subject Property, and/or that many of these databases were for tracking purposes only; these EDR listed sites **do not represent a REC** for the Subject Property.

Database: OR CRL, OR ECSI, OR INST CONTROL, OR VCP, OR BROWNFIELDS, HAZMAT

Site Name: **CLACKAMETTE COVE | (EDR ID: D20)**

Address: 16288 Main St, Oregon City, OR 97045

Distance: 564-ft or 0.107-mile (Nearby Property)

Direction: Northwest (down-gradient from Subject Property.)

Comments:

The CLACKAMETTE COVE | (EDR ID: D20) site (northwest nearby property) was identified on the OR CRL database, on the OR ECSI system database with a ECSI ID number of 2301, on the OR INST CONTROL database, on the OR VCP database, on the OR Brownfields Projects (BROWNFIELDS) database, and on the HAZMAT database.

Review of the ECSI database general site information (<https://www.deq.state.or.us/Webdocs/Forms/Output/>) indicated that the CLACKAMETTE COVE | (EDR ID: D20) site (northwest nearby property) has an investigative status of “Listed on the Confirmed Release List or Inventory” and Action Underway or Needed designation of “Remedial Action.” Additional details presented in the ECSI database of the CLACKAMETTE COVE | (EDR ID: D20) site (northwest nearby property) were presented in Section 6.0 of this report.

Note that the CLACKAMETTE COVE | (EDR ID: D20) site (northwest nearby property) has site environmental controls that include: “Use Restriction

Groundwater” (12/2/1998), “Use Restriction Land” (12/2/1998), and “Consent Decree” (12/3/1998).

- Based on the research information, the proximity of this EDR listed site, and the down-gradient location relative to the Subject Property;” the CLACKAMETTE COVE | (EDR ID: D20) site (northwest nearby property) **does not represent a REC** for the Subject Property.

Database: OR ECSI, OR CRL, OR ENG CONTROL, OR INST CONTROL, OR VCP, OR BROWNFIELDS

Site Name: **UNPERMITTED ROSSMAN LANDFILL PPA | (EDR ID: 34)**

Address: “AGNESS ST” (“No Situs” property on south adjoining to 15941 Agnes Ave, Oregon City, OR 97045)

Distance: 618-ft or 0.117-mile (Nearby Property)

Direction: Northwest (down-gradient from Subject Property.)

Comments:

The UNPERMITTED ROSSMAN LANDFILL PPA | (EDR ID: 34) site (northwest nearby property) was identified on the on the OR ECSI system database with a ECSI ID number of 1238, on the OR CRL database, on the OR ENG CONTROL database, on the OR INST CONTROL database, on the OR VCP database, and on the OR BROWNFIELDS database.

Review of the ECSI database general site information (<https://www.deq.state.or.us/Webdocs/Forms/Output/>) indicated that the UNPERMITTED ROSSMAN LANDFILL PPA | (EDR ID: 34) site (northwest nearby property) has an investigative status of “Listed on the Confirmed Release List or Inventory” and Action Underway or Needed designation of “Remedial Action.” Additional details presented in the ECSI database of the UNPERMITTED ROSSMAN LANDFILL PPA | (EDR ID: 34) site (northwest nearby property) were presented in Section 6.0 of this report.

Note that the UNPERMITTED ROSSMAN LANDFILL PPA | (EDR ID: 34) site (northwest nearby property) has site environmental controls that include: “Use Restriction Groundwater” (06/02/2000), “Contamination left in place, Soil” (06/02/2000), and “Consent Decree” (12/01/2004).

- Based on the research information, the proximity of this EDR listed site, and the down-gradient location relative to the Subject Property;” the UNPERMITTED ROSSMAN LANDFILL PPA | (EDR ID: 34) site (northwest nearby property) **does not represent a REC** for the Subject Property.

Database: OR ECSI, OR VCP, OR BROWNFIELDS

Site Name: **PARKER POND/THE APARTMENTS | (EDR ID: 35)**

Address: 16421 Main Ave, Oregon City, OR 97045

Distance: 1,095-ft or 0.207-mile (Nearby Property)

Direction: Northwest (down-gradient from Subject Property.)

Comments:

The PARKER POND/THE APARTMENTS | (EDR ID: 35) site (northwest nearby property) was identified on the on the OR ECSI system database with a ECSI ID number of 5138, on the OR VCP database, and on the OR BROWNFIELDS database.

Review of the ECSI database general site information (<https://www.deq.state.or.us/Webdocs/Forms/Output/>) indicated that the PARKER POND/THE APARTMENTS | (EDR ID: 35) site (northwest nearby property) has an investigative status of “Contamination Suspected” and Action Underway or Needed designation of “Partial No Further Action.” Additional details presented in the ECSI database of the PARKER POND/THE APARTMENTS | (EDR ID: 35) site (northwest nearby property) were presented in Section 6.0 of this report.

- Based on the research information, the proximity of this EDR listed site, and the down-gradient location relative to the Subject Property;” the PARKER

POND/THE APARTMENTS | (EDR ID: 35) site (northwest nearby property)
does not represent a REC for the Subject Property.

Database: OR ECSI, OR VCP

Site Name: **AL'S MACHINE (FORMER) | (EDR ID: G37)**

Address: 1608 Washington St, Oregon City, OR 97045

Distance: 1,162-ft or 0.220-mile (Nearby Property)

Direction: Southwest (cross-gradient from Subject Property.)

Comments:

The AL'S MACHINE (FORMER) | (EDR ID: G37) site (southwest nearby property) was identified on the OR ECSI system database with a ECSI ID number of 2900, and on the OR VCP database.

Review of the ECSI database general site information (<https://www.deq.state.or.us/Webdocs/Forms/Output/>) indicated that the AL'S MACHINE (FORMER) | (EDR ID: G37) site (southwest nearby property) has an investigative status of "No Further Action needed" and Action Underway or Needed designation of "NO FURTHER STATE ACTION REQUIRED." Additional details presented in the ECSI database of the AL'S MACHINE (FORMER) | (EDR ID: G37) site (southwest nearby property) were presented in Section 6.0 of this report.

- Based on the research information, the proximity of this EDR listed site, the down-gradient location relative to the Subject Property," and the investigative status of "No Further Action needed" in the ECSI database; the AL'S MACHINE (FORMER) | (EDR ID: G37) site (southwest nearby property) **does not represent a REC** for the Subject Property.

Database: SEMS-ARCHIVE, RCRA NonGen / NLR, OR ECSI, OR SWF/LF, OR BROWNFIELDS, HIST LF, SPILLS
Site Name: ROSSMAN METHANE RECOVERY FACILITY (EDR ID: J48) ROSSMAN'S LANDFILL (EDR ID: J49)
Address: EDR ID: J48 => "1701 17th St" (on southeast adjoining property to 1105 Abernathy Rd, Oregon City, OR 97045) EDR ID: J48 => "1101 17th St" (on southeast adjoining property to 1105 Abernathy Rd, Oregon City, OR 97045)
Distance: EDR ID: J48 => 242-ft or 0.046-mile (Adjoining Property) EDR ID: J49 => 242-ft or 0.046-mile (Adjoining Property)
Direction: EDR ID: J48 => Southwest (up-gradient from Subject Property.) EDR ID: J49 => Southwest (up-gradient from Subject Property.)
<p>Comments:</p> <p>The ROSSMAN METHANE RECOVERY FACILITY (EDR ID: J48) and the ROSSMAN'S LANDFILL (EDR ID: J49) sites (southwest adjoining property) was identified on the SEMS-ARCHIVE, on the RCRA NonGen / NLR database, on the ECSI database with a ECSI ID number of 674, on the OR SWF/LF database, on the OR BROWNFIELDS database, on the OR Old Closed SW Disposal Sites (HIST LF) database, and on the SPILLS database.</p> <p>Review of the ECSI database general site information (https://www.deq.state.or.us/Webdocs/Forms/Output/) indicated that the ROSSMAN METHANE RECOVERY FACILITY (EDR ID: J48) and the ROSSMAN'S LANDFILL (EDR ID: J49) sites (southwest adjoining property) has an investigative status of "Contamination Suspected" and Action Underway or Needed designation of "Prospective Purchaser Agreement." Additional details presented in the ECSI database of the ROSSMAN METHANE RECOVERY FACILITY (EDR ID: J48) and the ROSSMAN'S LANDFILL (EDR ID: J49) sites (southwest adjoining property) were presented in Section 6.0 of this report.</p> <ul style="list-style-type: none"> Based on the research information, the proximity of this EDR listed site, the down-gradient location relative to the Subject Property," and the investigative

status of “Contamination Suspected” in the ECSI database; the ROSSMAN METHANE RECOVERY FACILITY | (EDR ID: J48) and the ROSSMAN'S LANDFILL | (EDR ID: J49) sites (southwest adjoining property) **does represent REC** for the Subject Property.

The EDR Summary Radius Map Report and the EDR Radius Map Report with GeoCheck® are presented in Appendix N.

Other Mapped EDR Listings

A number of sites were mapped in the EDR report within the specified search radii. All the properties identified in the EDR database searches were summarized in the Executive Summary of the EDR Summary Radius Map Report (SUMMARY_RADIUS_7460573_2-Summary Radius Map.pdf) presented in Appendix N.

Sites that were not directly adjacent to the Subject Property, located at a lower elevation, located at a relative direction and/or distance that would not likely impact the Subject Property, whose environmental issues were dealt with and closed with “No Further Action” designations, or whose listing was for tracking purposes only or only represented proper notification of registration of UST's, AST's, or hazardous activities without violations, or whose listing was for de minimis issues only; and did not represent a REC for the Subject Property.

Unmapped EDR Listings

Five (5) sites were shown on the EDR “Orphan Summary” list provided in the EDR Summary Radius Map Report (page 690) and the EDR Radius Map Report with GeoCheck®. These sites were unmapped. Review of the available details indicated the unmapped sites were either not directly adjacent to the Subject Property; were located at a lower elevation; were located at a relative direction and/or distance that would not be likely to impact the Subject Property, whose environmental issues were dealt with and closed with a “No Further Action” designation, or whose listing was for tracking purposes only or only represented proper notification of registration of UST's, AST's, or hazardous activities without violations, or whose listing was for de minimis issues only; and did not represent a REC for the Subject Property.

Note that the “Orphan Site” identified as OLD ROSSMAN LANDFILL – SOUTH with an address of AGNES ST is related to the:

- **Old Rossman Landfill – South | ECSI ID: 3126** located on “Agnes St,” Oregon City, OR 97045 and is discussed in Section 6.0 of this report, and/or
- **UNPERMITTED ROSSMAN LANDFILL PPA | (EDR ID: 34)** located on “Agness St,” Oregon City, OR 97045 and is discussed above.

8.2 Local and State Agencies

Readily available records and databases of local and state agencies (as applicable) were reviewed for indications of environmental concern for the Subject Property.

8.2.1 Fire Department – Subject Property

The Oregon State Fire Marshal maintains the Oregon Community Right to Know program that has collected Hazardous Substance Incident Reports from emergency responders (<https://www.oregon.gov/osfm/industry/Pages/hazmat-incident-search.aspx>).

The Subject Property (including 1799 Washington St and 1975 Washington St in Oregon City, OR) was not identified in the Oregon Office of the Fire Marshal Hazardous (HAZMAT) Incident database for the years from 2010 to 2023.

8.2.2 Assessors – Subject Property

Available assessor information and details of the Subject Property (including 1795 Washington St and 1799 Washington St) were generally derived from the City of Oregon City - OC WEBMAPS parcel property information database (<https://www.orcity.org/397/OC-WebMaps>), the Clackamas County - CMAP parcel property information database (<https://cmap.clackamas.us/maps>), and/or the City of Portland - PortlandMaps parcel property information database (<https://www.portlandmaps.com>).

Clackamas County Assessor information details for the Subject Property, are presented below.

SUBJECT PROPERTY: 1799 Washington St, Oregon City, OR 97045

(aka 1975 Washington St, Oregon City, OR 97045)

- Owner: No Information Provided
- Address: 1799 Washington St and 1795 Washington St, Oregon City, OR 97045
- Property ID: C156892
- County: Clackamas
- State ID: 22E29 01402
- Alternate Account Number: 22E29 01402
- Taxlot No: 22E29 01402
- City of Oregon City – Zoning Map: “Mixed Use Downtown (MUD)”
- Neighborhood: Two Rivers

There were no indications of environmental liens, or administrative use limitations for the Subject Property within the Clackamas County Assessor information details. The Clackamas County Assessor information database identified two (2) accounts associated with the Subject Property (specifically 1795 Washington St). These two (2) accounted included:

- Parcel No: P2233394 => Pacific Mobile Structures Inc
- Parcel No: P2250964 => Clackamas Landscape Supply Inc

8.2.3 Planning and Building – Subject Property

Oregon City maintains an online mapping and information database that provided public access to property information (<https://maps.oregoncity.org/>). A wide variety of data was available on the OCWebMaps tool for the Oregon City Area. The website was searched for information concerning the Subject Property (including 1795 Washington St and 1799 Washington St). None of the information presented was related to potential environmental concerns on the Subject Property.

8.2.4 Local or Regional Environmental Authority – Subject Property and Nearby Properties

EW searched the DEQ Facility Profiler-Lite online database (<https://hdcgcx1.deq.state.or.us/Html5viewer291/?viewer=FacilityProfilerLite>) for the addresses related to the Subject Property (including 1795 Washington St and 1799 Washington St) and nearby properties. The DEQ Facility Profiler-Lite online database includes information on closed facilities, completed cleanups, and past operations as well

as data on current operations and activities. The purpose of searching the DEQ Facility Profiler-Lite online database was to identify possible regulatory information that was potentially not included in the EDR Summary Radius Map Report and the EDR Radius Map Report with GeoCheck®.

No specific listings were found on the DEQ Facility Profiler-Lite online database for the Subject Project (including 1795 Washington St and 1799 Washington St).

The listings on the adjoining and nearby properties identified on the DEQ Facility Profiler-Lite online database appeared to have been listed in the EDR Summary Radius Map Report and the EDR Radius Map Report with GeoCheck®.

8.2.5 Public Health Authority – Subject Property and Adjoining Properties

The Oregon Health Authority (OHA) - Healthy Homes and Neighborhoods works at the request of concerned individuals and organizations to assess and prevent human exposure to contamination. Department activities include the Clandestine Drug Labs Cleanup program which works to protect human health by assuring that properties formerly used for illegal drug manufacturing are properly evaluated, decontaminated, and are fit for re-occupancy.

The OHA Clandestine Drug Lab Cleanup program website directs the public to a list of “drug lab properties (unfit-for-use)” on the Oregon Building Codes Division (BCD) webpage (<https://www.oregon.gov/BCD/jurisdictions/Pages/drug-labs.aspx>).

The Subject Property (including 1795 Washington St and 1799 Washington St) was not identified in the OR BCD database.

8.3 Vapor Screening

A search of available environmental records was conducted by EDR and compiled into a vapor encroachment screening tool. The report was designed to assist parties seeking to meet the search requirements of the ASTM Standard Practice for Assessment of Vapor Encroachment into Structures on Property Involved in Real Estate Transactions (E 2600-15). Utilizing the E2600-15 Tier I Vapor Encroachment Screening process provided by EDR, four (4) listing for the Subject Property (1795 Washington St), and eighteen (18) listings for nearby sites located within 0.33-mile of the Subject Property were identified as

having potential to cause a Vapor Encroachment Condition (VEC). The EDR Vapor Encroachment Screen report is presented in Appendix O.

Review of the EDR Vapor Encroachment Screen report indicated that the **STIMSON MILL (FORMER) | (EDR ID: A1 and A2) sites, and the STIMSON MILL - FORMER | (EDR ID: A4) site does represents a potential REC for the Subject Property.**

Database: OR RGA HWS
Site Name: STIMSON MILL (FORMER) (EDR ID: A1 and A2); and STIMSON MILL - FORMER (EDR ID: A4)
Address: 1795 Washington St, Oregon City, OR 97045
Distance: NA - Subject Property
Direction: NA - Subject Property
Comments: The STIMSON MILL (FORMER) (EDR ID: A1 and A2) site (Subject Property) and the STIMSON MILL - FORMER (EDR ID: A4) site (Subject Property) were identified on the Oregon Recovered Government Archive State Hazardous Waste Facilities (OR RGA HWS) database as a Hazardous Waste Facility from 1997 through 2012. <ul style="list-style-type: none">• Based on the research information, the location as the subject property, and the historical site uses; the STIMSON MILL (FORMER) (EDR ID: A1 and A2) site (Subject Property) and the STIMSON MILL - FORMER (EDR ID: A4) site (Subject Property) represents a potential REC for the Subject Property.

Review of the EDR Vapor Encroachment Screen report indicated that the following listed sites have a potential to cause a VEC, and represents a potential REC for the Subject Property:

- STIMSON MILL (FORMER) | (EDR ID: A1)
- STIMSON MILL (FORMER) | (EDR ID: A2)
- STIMSON LUMBER COMPANY | (EDR ID: A3)
- STIMSON MILL - FORMER | (EDR ID: A4)
- STIMSON LUMBER – PARCEL 1 (FORMER) | (EDR ID: 5)

- MAVERICK WELDINGSUPPLIES INC | (EDR ID: B6)
- WILLAMETTE HI-GRADE CONCRETE CO | (EDR ID: C7)
- WILLAMETTE HI-GRADE CONCRETE CO | (EDR ID: C8)
- KELLY FIELD CARDLOCK | (EDR ID: C9)
- AUTO TECHNIKS AUTOMOTIVE | (EDR ID: C10)
- STEIN OIL/KELLY FIELD | (EDR ID: C11)
- FRANCIS WELSH SILICA MINE | (EDR ID: C13)
- FRANCIS WELSH SILICA MINE | (EDR ID: C14)
- BUDS RADIATOR SHOP | (EDR ID: B15)
- BUD'S RADIATOR SHOP | (EDR ID: B17)
- METRO SOUTH STATION | (EDR ID: 18)
- CLACKAMAS COUNTY DTD | (EDR ID: E27)

In addition, review of the EDR Summary Radius Map Report (page 690) and the EDR Radius Map Report with GeoCheck® indicated that the following listed sites also have a potential to cause a VEC, and represents a potential REC for the Subject Property:

- ROSSMAN METHANE RECOVERY FACILITY | (EDR ID: J48)
- ROSSMAN'S LANDFILL | (EDR ID: J49)

9.0 SITE RECONNAISSANCE – SUBJECT PROPERTY AND ADJOINING PROPERTIES

On October 12, 2023, Mr. Jin Park, R.G. (Geologist | Hydrogeologist) of EW conducted a site reconnaissance of the Subject Property. The site reconnaissance included walking the interior areas and the perimeter of the Subject Property (where feasible) and noting features (e.g. operations, processes, maintenance, chemicals and/or petroleum products used, chemical and/or petroleum products stored on-site, presence of containers, debris, soil staining, sheen, soil discoloration, distressed vegetation, etc.) that may be indicative of potential environmental impacts.

The location of the Subject Property is presented in Figure 1. The boundaries of the Subject Property and surrounding neighbors are presented on Figure 2. The locations and descriptions of the Subject Property and select identified site features are presented on Figure 5 and Figure 6. The site reconnaissance photographic logs of select identified features on or near the Subject Property was included in Appendix P.

Findings from the site reconnaissance are summarized below.

9.1 Site Features - Subject Property

The Subject Property was a generally elongated triangular and irregularly shaped 6.83-acre parcel with a large sloped ramp type surface feature located near the northwest central side of the property. The Subject Property was the northeastern portion of the Former Stimson Lumber Mill Property.

During the site reconnaissance, the Subject Property was observed to be occupied and operated by a commercial landscape supply distribution business identified as “Clackamas Landscape Supply, Inc.”

Site Features

The site features observed during the site reconnaissance of the Subject Property included:

- a large **ramp type surface feature** sloped downward toward the northeast and east (likely constructed by the Former Stimson Lumber Mill);
- a **mobile trailer type building** used for sales, dispatch, and as an office; a “sales display” type shed structure;
- a vehicle and equipment **maintenance supply shed** used for the storage of vehicle maintenance products (i.e. oil, gear lubricant);
- a semi-trailer on wheels used for general storage and as a **general mechanical work shop**;
- and a **vehicle weigh scale**.

None of these structures appeared to have been built on permanent building foundations. A small septic holding tank was observed below the mobile trailer type building (office). The Subject Property was enclosed by a chain-linked fence and gates.

Significant portions of the ground surface areas were used for the storage and display of commercial landscape supplies (i.e. gravel, sand, rocks, mulch). The visible ground surfaces used for parking, and/or loading and unloading appeared to generally consist asphalt, gravel, concrete foundation slabs and small concrete wall remnant (likely related to the Former Stimson Lumber Mill building structure). Note that a pile crushed asphalt debris material was observed near the northern side of the Subject Property (refer, Figure

6). Some areas of the ground surface were also not visible or accessible due to the presence of dense vegetation.

Numerous electrical poles, fire hydrants, utility pipes, water lines, stormwater catch basins, outfalls, and stormwater diversion ditches and culverts were observed along the southeast boundary of the Subject Property. No pole mounted transformers were observed on or near the Subject Property. No indications for the presence of HOTs, and/or USTs were observed on the Subject Property.

The site reconnaissance indicated:

- No visible site features or other observations related to RECs were identified on the Subject Property.
- The observed site features that were likely related to de minimis conditions on the Subject Property included:
 - Maintenance Supply Shed with Petroleum Products;
 - Stormwater Catch-Basins potentially connected to UICs or outfalls; and
 - Crushed Asphalt Debris Material.

The boundaries of the Subject Property and surrounding neighbors are presented on Figure 2. The locations and descriptions of the Subject Property and adjoining property features are presented on Figure 3. The locations and descriptions of the site features are presented on Figure 5 and Figure 6. The site reconnaissance photographic logs of select site features related to the Subject Property were included in Appendix P.

9.2 Site Features - Adjoining Properties and Right-of-Ways

The properties adjoining the Subject Property appeared to be currently occupied by the “End of the Oregon Trail Interpretive Center” to the south, the “Oregon City Station” AMTRAK train station to the southwest, a rail road track right-of-way along the northwest boundary, the “Metro South Transfer Station” with pond to the northeast, a gravel access road right-of-way along the northeast property boundary, the Trails End Golf Center” to the east, a vacant lot to the southeast, and the Stark Steet Lawn and Garden Oregon City store to the southeast.

South Adjoining Property

The adjoining property to the south was observed to be the “**End of the Oregon Trail Interpretive Center**” (1726 Washington St, Oregon City, OR 97045).

- No features related to potential environmental concerns were observed on the south adjoining property.

Southwest Adjoining Property

The adjoining property to the southwest was observed to be the “**Oregon City Station**” **AMTRAK train station** (1757 Washington St, Oregon City, OR 97045).

- No features related to potential environmental concerns were observed on the west and northwest adjoining property.

Northwest Adjoining Right-of-Way Property

The adjoining property to the southwest was observed to be **rail road tracks right-of-way** (No Situs). along the northwest boundary,

- No features related to potential environmental concerns were observed on the northwest adjoining property.
- **Note:** the large ballast rocks used for the base of the rail road tracks may be a preferential migration pathway or conduit for stormwater water runoff.

North-Northeast Adjoining Property

The adjoining property to the north-northeast was observed to be the “Metro South Transfer Station” with a small pond.

- No features related to potential environmental concerns were observed on the north-northeast adjoining property

Northeast Adjoining Right-of-Way Property

The adjoining property to the northeast was observed to be a gravel access road right-of-way (No Situs). The flush-mount monuments of several groundwater and soil gas monitoring wells were observed along the gravel access road right-of-way. The

approximate locations of these groundwater and soil gas monitoring wells are presented in Figure 6.

- The presence of these groundwater and soil gas monitoring wells along the gravel access road right-of-way **does represent a potential REC** for the Subject Property.

East Adjoining Property

The adjoining property to the east was observed to be the “Trails End Golf Center” (1107 Abernathy Rd, Oregon City, OR 97045).

- No features related to potential environmental concerns were observed on the east adjoining property.
- **Note:** the “Trails End Golf Center” (1107 Abernathy Rd, Oregon City, OR 97045) property is part of the former Rossman’s Landfill site (ECSI: 674), and is the former Rossman’s Landfill site **does represent a potential REC** for the Subject Property.

Southeast Adjoining Property

The adjoining property to the southeast was observed to be a vacant lot (1810 Washington St, Oregon City, OR 97045).

- No features related to potential environmental concerns were observed on the northeast adjoining property

Southeast Adjoining Property

The adjoining property to the southeast was observed to be the “Stark Steet Lawn and Garden Oregon City” store (1780 Washington St, Oregon City, OR 97045).

- No features related to potential environmental concerns were observed on the southeast adjoining property

The boundaries of the Subject Property and surrounding neighbors are presented on Figure 2. The locations and descriptions of the Subject Property and adjoining property features are presented on Figure 3. The locations and descriptions of the site features are

presented on Figure 5 and Figure 6. The site reconnaissance photographic logs of select site features related to the Subject Property were included in Appendix P.

9.3 Non-ASTM Findings

9.3.1 Asbestos

For buildings constructed prior to 1981, the Code of Federal Regulations (29 CFR 1926.1101 and 29 CFR 1910.1001) defined presumed asbestos-containing material (PACM) as:

1. Thermal System Insulation (TSI), such as boiler insulation, pipe lagging, fireproofing; and
2. Surfacing Materials, such as acoustical ceilings.

Building owners/employers are responsible for locating the presence and quantity of PACM. Building Owners/employers could evaluate installed material as PACM by either having an inspection in accordance with Asbestos Hazard Emergency Response Act (AHERA) (40 CFR Part 763, Subpart E) or by hiring an accredited inspector to collect and test bulk samples of the suspect material. No obvious PACMs were observed on the Subject Property during the site reconnaissance. A formal survey for ACMs was not performed as part of this ESA.

No indications for the presence of PACM were observed on the Subject Property during the site reconnaissance.

9.3.2 Lead Based Paint

Lead-based paint (LBP) was defined as any paint, varnish, stain, or other applied coating that has $\geq 1 \text{ mg/cm}^2$ (5,000 $\mu\text{g/g}$ or 5,000 ppm) or more of lead by federal guidelines. State and local definitions of LBP may differ from the federal definitions in amounts ranging from 0.5 mg/cm^2 to 2.0 mg/cm^2 . Section 1017 of the Housing and Urban Development (HUD) Guidelines, Residential Lead-Based Paint Hazard Reduction Act of 1992, otherwise known as "Title X", defined a LBP hazard as "any condition that causes exposure to lead that would result in adverse human health effects" resulting from lead-contaminated dust, bare, lead-contaminated soil, and/or lead-contaminated paint that was deteriorated or present on accessible, friction, or impact surfaces. Therefore, under Title X, intact lead-based paint on most walls and ceilings would not be considered a "hazard", although the

paint should be maintained and its condition monitored to ensure that it does not deteriorate and become a hazard. Additionally, Section 1018 of this law directed HUD and EPA to require the disclosure of known information on lead-based paint and lead-based paint hazards before the sale or lease of most housing built before 1978. Most private housing, public housing, federally owned or subsidized housing was affected by this rule.

Lead-containing paint (LCP) was defined as any paint with any detectable amount of lead present in it. It was important to note that LCP may create a lead hazard when being removed. The condition of these materials must be monitored when they are being disturbed. In the event LCP is subject to abrading, sanding, torching and/or cutting during demolition or renovation activities, there may be regulatory issues that must be addressed.

The information below is for general informational purposes only and does not constitute a lead hazard evaluation. In addition, the information was not intended to comply with federal, state or local regulations in regards to lead-containing paints.

In buildings constructed after 1978, it is unlikely that LBP was present. Actual material samples would need to be collected or an XRF survey performed in order to determine if LBP was present. It should be noted that construction activities that disturb materials or paints containing *any amount* of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62.

No indications for the presence of LBP were observed on the Subject Property during the site reconnaissance.

9.3.3 Mold

EW observed the Subject Property to identify if there was any significant presence of mold. No indications of mold were observed on the Subject Property during the site reconnaissance.

This activity was not designed to discover all areas which may be affected by mold growth on the Subject Property. Rather, it was intended to give the Client an indication if significant mold growth (based on observed areas) was present at the Subject Property.

No indications of significant mold growth were observed.

9.3.4 Radon

Radon is a colorless, tasteless radioactive gas with an EPA-specified action level of 4.0 picocuries per liter of air (pCi/L). Radon gas has a very short half-life of 3.8 days. The health risk potential of radon is associated with its rate of accumulation within confined areas, particularly confined areas near or in the ground, such as basements, where vapors can readily transfer to indoor air from the ground through foundation cracks or other pathways. Large, adequately ventilated rooms generally present limited risk for radon exposure.

According to radon information obtained from the Oregon Health Authority (<https://www.oregon.gov/oha/ph/healthyenvironments/healthyneighborhoods/radongas/pages/zipcode.aspx>), the Subject Property was located within an area with “Moderate” risk.

9.3.5 PCB Evaluation

Some older electrical transformers, capacitors, generators, lifts, and elevators may contain PCB fluid. PCBs are recognized as a toxic substance by the EPA under the Toxic Substance Control Act. Any transformer containing PCBs at a concentration of 500 ppm or greater were subject to violations. Leakage from PCB-containing equipment would represent an environmental concern.

During the site reconnaissance, no pole-mounted transformers or other features potentially related to PCBs were observed on the Subject Property.

9.3.6 Per- and Poly-Fluoroalkyl Substances (PFAS)

According to the US EPA, “Per- and Polyfluoroalkyl Substances (PFAS) are a group of manufactured chemicals that have been used in industry and consumer products since the 1940s because of their useful properties. There are thousands of different PFAS, some of which have been more widely used and studied than others. Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS), for example, are two of the most widely used and studied chemicals in the PFAS group. PFOA and PFOS have been replaced in the United States with other PFAS in recent years. One common characteristic of concern of PFAS is that many break down very slowly and can build up in people, animals, and the environment over time.

PFOS/PFAS have been known to be used in various products such as firefighting suppressant, nonstick cookware, waterproof material, and metal finishing. Based upon the current and historical use of the Subject Property, the Subject Property is not expected to have been impacted by PFAS; and PFAS were not identified as contaminants of concern in previous environmental assessments for the Subject Property.

10.0 FINDINGS, CONCLUSIONS, OPINIONS, AND RECOMMENDATIONS

EW performed a Phase I ESA for the for the “Mixed Use Downtown (MUD)” zoned Subject Property located at 1799 Washington Street in Oregon City, Clackamas County, Oregon (State Identification: 22E29 01402), at the request of the owner and the owner representative of the Subject Property (City of Oregon City, and City of Oregon City | Department of Economic Development - Mr. James N. Graham, CEcD).

The Phase I ESA was conducted in conformance with the scope and limitations of the ASTM Standard Practices for Environmental Site Assessments: Phase I Environmental Site Assessment Process, E1527-13 and E1527-21, and the standard of “all appropriate inquiry” under the Oregon Revised Statutes (ORS) § 465.255(6), and 40 CFR Part 312 Standard Practices or All Appropriate Inquiries. Any exception to, or deletions from, this practice were described in Section 12.3 of this report.

The findings, opinions, and recommendations are presented in Section 1.5 of this report.

11.0 STATEMENT AND SIGNATURE OF ENVIRONMENTAL PROFESSIONAL

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR Part 312.10 and I have the specific qualifications based on education, training, and experience to assess the nature, history and setting of the Subject Property. My environmental professional qualifications are presented in Appendix Q. I have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Jin Park

Jin Park, R.G., L.H.G
Geologist | Hydrogeologist
RG ID: G1861



EXPIRES: 12/31/23

Date: December 13, 2023

12.0 LIMITATIONS

12.1 Standard of Care

This Phase I 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 on the Subject Property, 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 may not have been 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 the Subject 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 Subject Property 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.

12.2 Limitations and Exceptions

The condition of the Subject Property, as well as local, state, tribal and federal regulations can change significantly over time. Therefore, the findings, conclusions, and recommendations presented as a result of this study apply strictly to the environmental regulations and property conditions existing at the time the study was performed. Available information has been analyzed using currently accepted assessment techniques and it is believed that the inferences made are reasonably representative of the Subject Property. EW makes no warranty, expressed or implied, except that the services have been

performed in accordance with generally accepted environmental property assessment practices applicable at the time and location of the study.

Considerations identified by ASTM as beyond the scope of a Phase I ESA that may affect business environmental risk at a given property include the following: asbestos-containing materials, radon, lead-based paint, mold, PFAS, and vapor encroachment. These environmental issues or conditions may warrant assessment based on the type of the property transaction; however, they are considered non-scope issues under ASTM Standard Practice E1527-21.

Regardless, the purpose of this assessment is solely to satisfy one of the requirements for qualification of the innocent landowner defense, contiguous property owner or bona fide prospective purchaser under the CERCLA. ASTM Standard Practice E1527-21 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) constitute the “all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice” as defined in:

- 42 U.S.C § 9601(35) (B), referenced in the ASTM Standard Practice E1527-21.
- Sections 101(35)(B) (ii) and (iii) of CERCLA and referenced in the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312).
- 42 U.S.C. 9601(40) and 42 U.S.C. 9607(q).

The Phase I ESA is not, and should not be construed as a warranty or guarantee about the presence or absence of environmental contaminants that may affect the property. Neither is the assessment intended to assure clear title to the property in question. The sole purpose of the assessment into property title records is to ascertain a historical basis of prior land use. All findings, conclusions, and recommendations stated in this report are based upon facts, circumstances, and industry-accepted procedures for such services as they existed at the time this report was prepared (e.g. federal, state, and local laws, rules, regulations, market conditions, economic conditions, political climate, and other applicable matters). All findings, conclusions, and recommendations stated in this report are based on the data and information provided, and observations and conditions that existed on the date and time of the property visit.

Responses received from local, state, or federal agencies or other secondary sources of information after the issuance of this report may change certain facts, circumstances, findings, or conclusions to the report. A change in any fact, circumstance, or industry-accepted procedure upon which this report was based may adversely affect the findings, conclusions, and recommendations expressed in this report.

12.3 Significant Assumptions and Data Gaps

Based upon the agreed-on scope of services, this ESA did not include subsurface or other invasive assessments, business environmental risk evaluations, or other services not particularly identified and discussed herein, including a complete evaluation of vapor encroachment conditions. Pertinent documents are referred to in the text of this report, and copies of select documents are included as Appendices. 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. An evaluation of the significance of these 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 site reconnaissance, and from other activities described herein. Such information is subject to change. Certain indicators of the presence

of hazardous substances or petroleum products 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.

13.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONAL

Jin Park, R.G., L.H.G

Geologist | Hydrogeologist

Oregon Registered Geologist ID: G1861

Mr. Park has practiced environmental science, geology and hydrogeology throughout Oregon and Washington for over 25 years. He has managed a wide range of projects including Phase I ESAs, Phase II Site Characterizations, and Phase III Remedial Actions, Environmental Risk Assessments, Beneficial Water Use Evaluations, Groundwater Investigations, and more. Mr. Park's environmental professional qualifications are presented in Appendix Q.

14.0 REFERENCES

ASTM International, Designation: E 1527-13 and E 1527-21, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, 2013 and 2021.

ASTM International, Designation: E 2600-15, Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions, 2010.

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www.oregon.gov/BCD/jurisdictions/Pages/drug-labs.

Oregon Health Authority, Radon Gas:
www.oregon.gov/oha/ph/healthyenvironments/healthyneighborhoods/radongas.

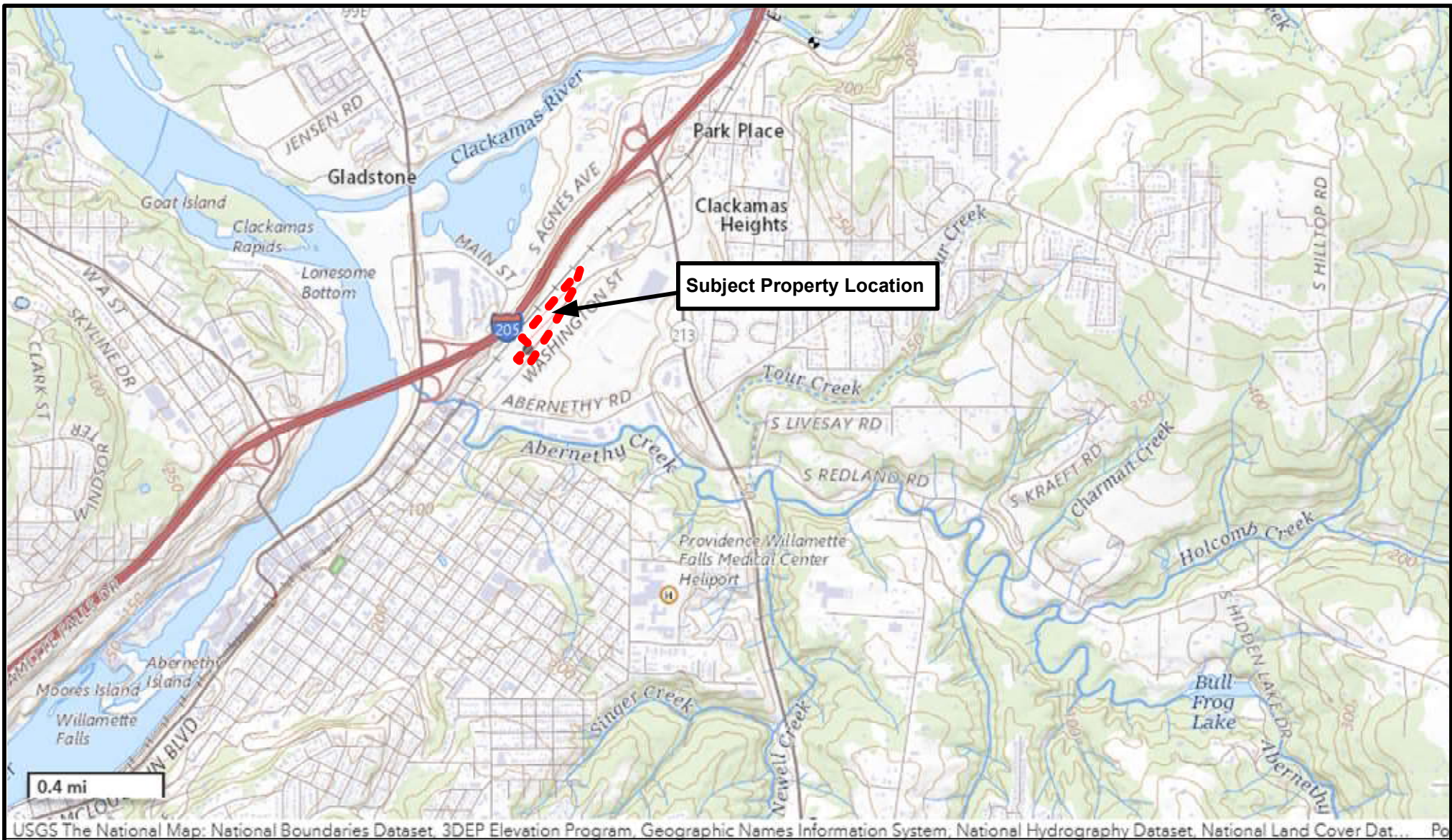
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<http://websoilsurvey.nrcs.usda.gov>

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Walker, G. W. and McLeod, N. S., 1991, Geologic Map of Oregon: U.S. Geological Survey; reviewed November 2022 on Google Earth with geologic unit overlay.



U.S. Geological Survey, topoBuilder Application v: 1.4

Note: All Locations and Scale are Approximate

0 0.4
MILES



FIGURE 1: SUBJECT PROPERTY LOCATION



22820 NE Sandy Blvd
Fairview, OR 97024

PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA)
1799 WASHINGTON ST (STATE ID: 22E29 01402)
aka 1795 WASHINGTON ST
NE PORTION OF FORMER STIMSON LUMBER MILL PROPERTY – PARCEL 2
OREGON CITY, OR 97045

12/23
jcp

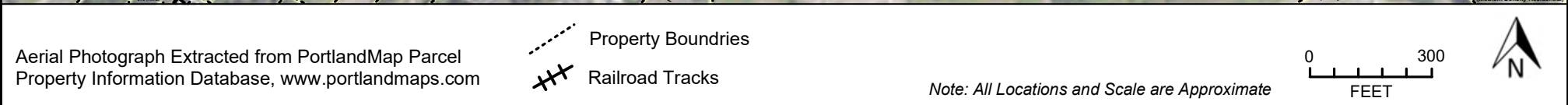
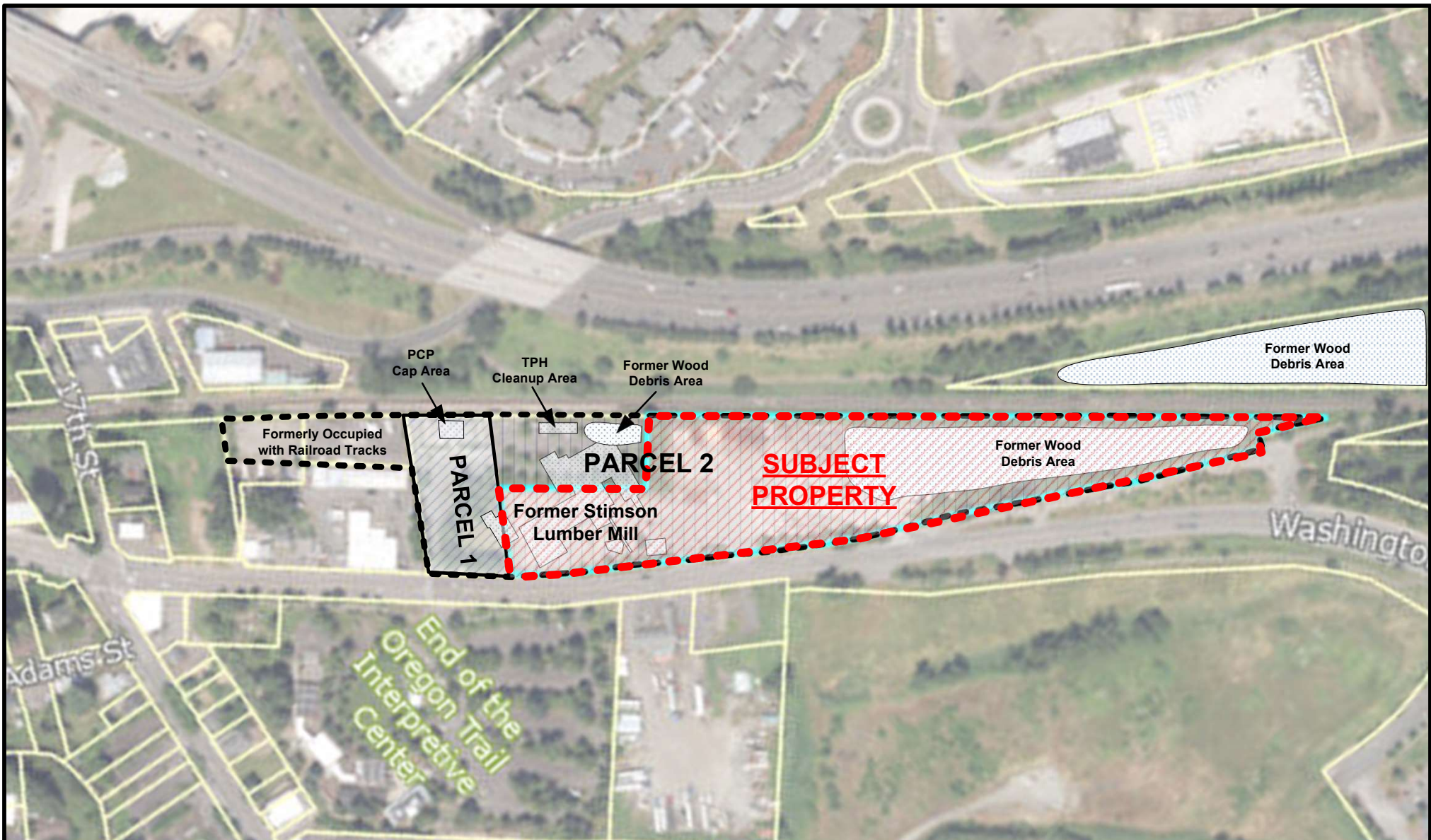


FIGURE 2: SUBJECT PROPERTY AND SURROUNDING PROPERTIES LOCATIONS

PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA)
1799 WASHINGTON ST (STATE ID: 22E29 01402)
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OREGON CITY, OR 97045



PCP = Pentachlorophenol (Log Stain Inhibitor - Dip Tank and Spray Area)
 TPH = Total Petroleum Hydrocarbons (Drum Storage Area)

Aerial Photograph Extracted from PortlandMap Parcel Property
 Information Database, www.portlandmaps.com

Note: All Locations and Scale are Approximate

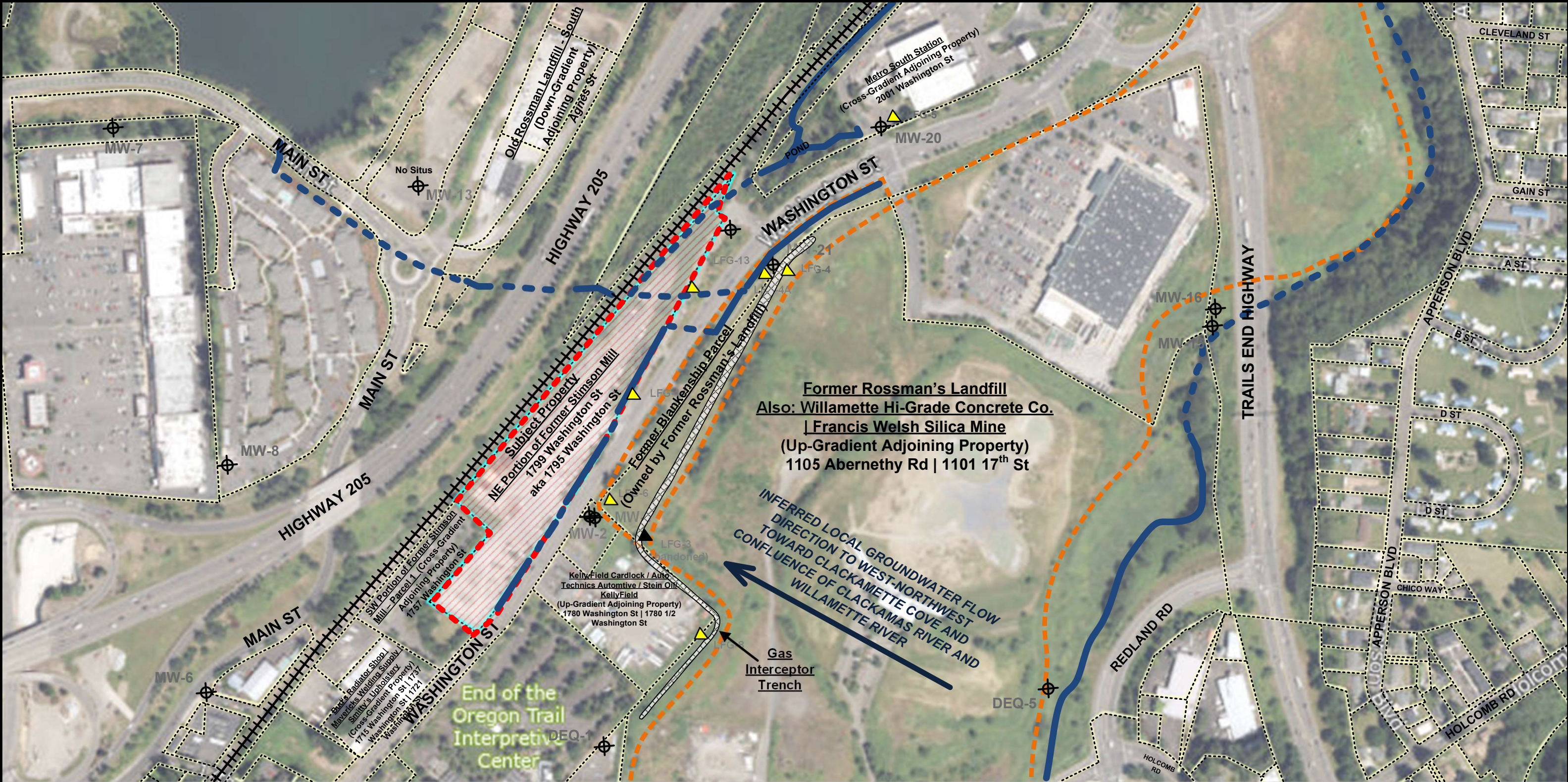


FIGURE 3: SUBJECT PROPERTY – NE PORTION OF FORMER STIMSON LUMBER MILL PROPERTY INCLUDING PARCEL 1 AND PARCEL 2

PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA)
 1799 WASHINGTON ST (STATE ID: 22E29 01402)
 aka 1795 WASHINGTON ST
 NE PORTION OF FORMER STIMSON LUMBER MILL PROPERTY – PARCEL 2
 OREGON CITY, OR 97045



22820 NE Sandy Blvd
 Fairview, OR 97024



Aerial Photograph Extracted from PortlandMap Parcel Property Information Database, www.portlandmaps.com

- Groundwater Monitoring Well
- Soil Gas Monitoring Well
- Abandoned Soil Gas Monitoring Well

- Drainage Ditch
- Buried Drainage Culvert
- Former Rossman's Landfill

Note: All Locations and Scale are Approximate

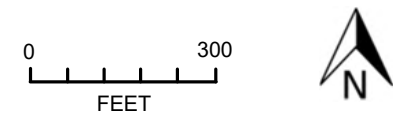
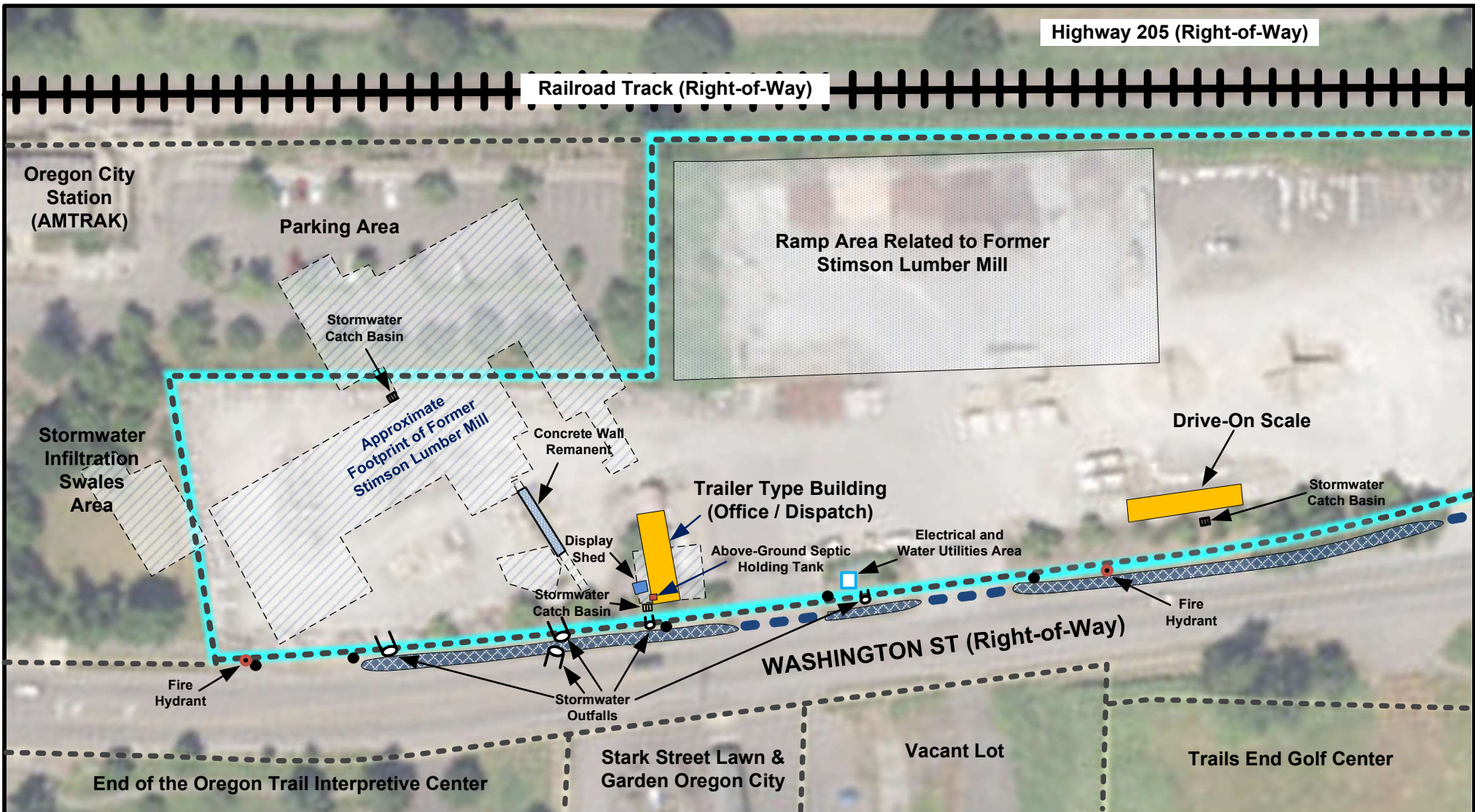










FIGURE 4: SUBJECT PROPERTY AND FORMER ROSSMAN'S LANDFILL LOCATION

PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA)
1799 WASHINGTON ST (STATE ID: 22E29 01402)
aka 1795 WASHINGTON ST
NE PORTION OF FORMER STIMSON LUMBER MILL PROPERTY – PARCEL 2
OREGON CITY, OR 97045



-  Storm Water - Drainage Ditch
-  Storm Water - Buried Drainage Culvert
-  Stormwater - Outfalls
-  Stormwater - Catch Basins

-  Property Boundaries
-  Railroad Track

-  Power Poles (with No Transformers)
-  Fire Hydrant

0 100
FEET



Aerial Photograph Extracted from PortlandMap Parcel
Property Information Database, www.portlandmaps.com

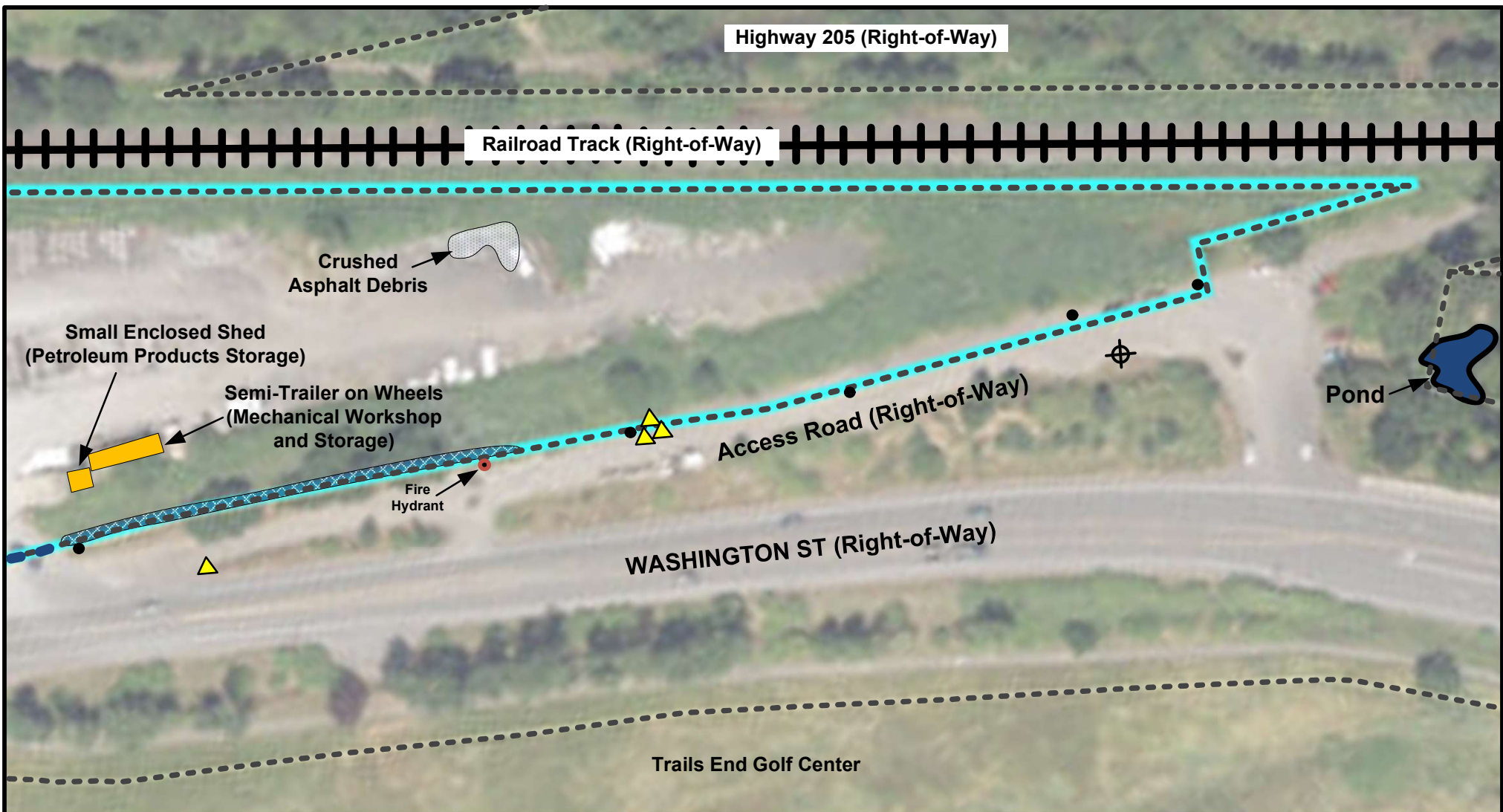
Note: All Locations and Scale are Approximate









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Fairview, OR 97024



FIGURE 5: SITE FEATURES - SOUTHWEST PORTION OF SUBJECT PROPERTY

PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA)
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aka 1795 WASHINGTON ST
NE PORTION OF FORMER STIMSON LUMBER MILL PROPERTY – PARCEL 2
OREGON CITY, OR 97045



-  Storm Water - Drainage Ditch
-  Storm Water - Buried Drainage Culvert
-  Groundwater Monitoring Well
-  Soil Gas Monitoring Well

-  Property Boundaries
-  Railroad Track

-  Power Poles (with No Transformers)
-  Fire Hydrant

0 100
FEET



Aerial Photograph Extracted from PortlandMap Parcel
Property Information Database, www.portlandmaps.com

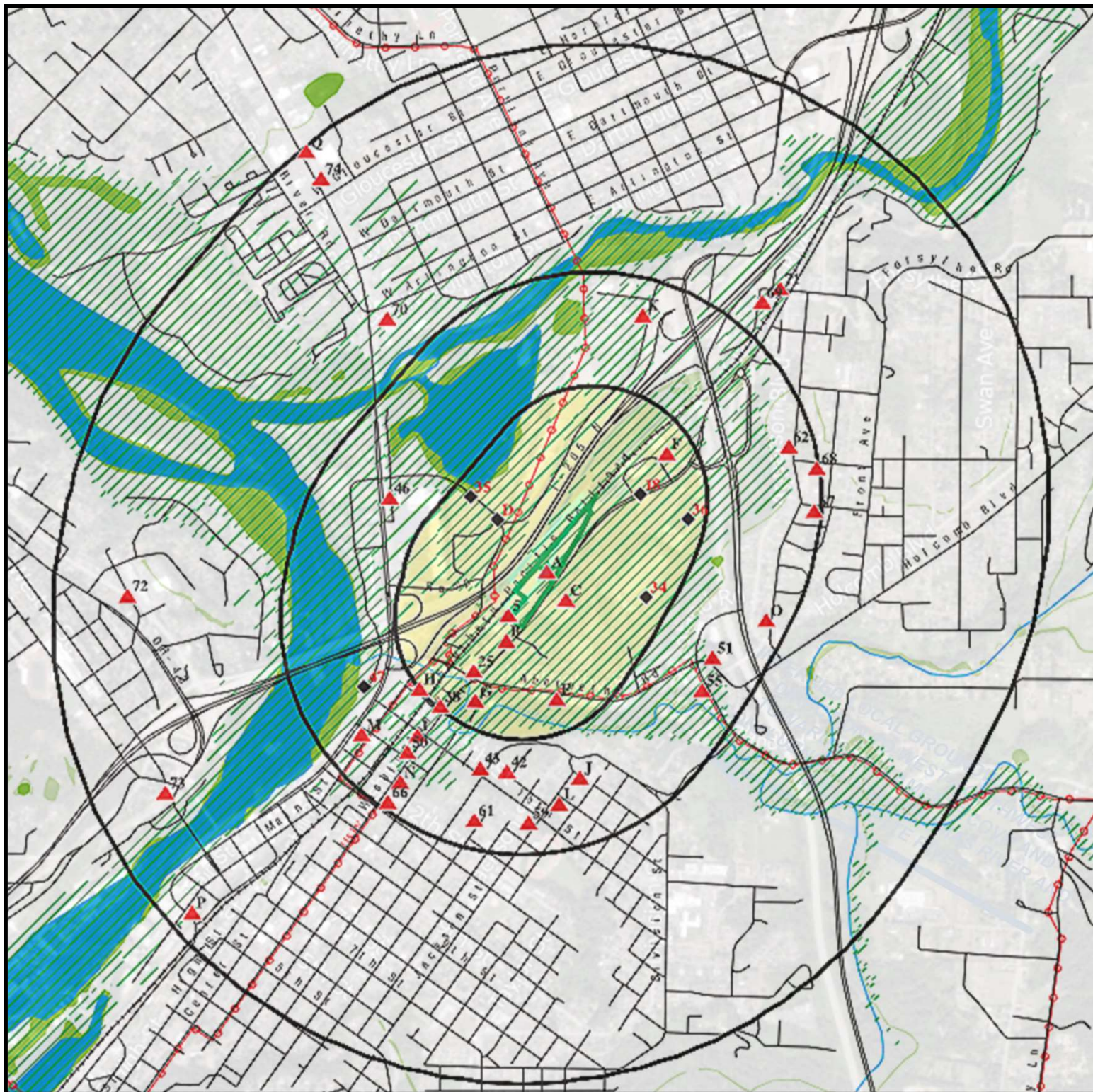
Note: All Locations and Scale are Approximate

FIGURE 6: SITE FEATURES - NORTHEAST PORTION OF SUBJECT PROPERTY

PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA)
1799 WASHINGTON ST (STATE ID: 22E29 01402)
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NE PORTION OF FORMER STIMSON LUMBER MILL PROPERTY – PARCEL 2
OREGON CITY, OR 97045



22820 NE Sandy Blvd
Fairview, OR 97024



EDR Listed Sites Identified for Review were
Presented in the EDR SUMMARY RADIUS MAP
REPORT: OVERVIEW MAP – 7460573.2S
(Appendix N - Page 21)

Aerial Photograph Extracted from PortlandMap Parcel Property
Information Database, www.portlandmaps.com

Note: All Locations and Scale are Approximate

0 0.2
Mile



FIGURE 7: EDR LISTED SITES IDENTIFIED FOR REVIEW
(EDR Radius Map Report presented in Appendix N)



22820 NE Sandy Blvd
Fairview, OR 97024

PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA)
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OREGON CITY, OR 97045