

PHASE I ENVIRONMENTAL SITE ASSESSMENT

DRAFT FOR DISCUSSION PURPOSES ONLY

4.212-ACRE INDUSTRIAL PROPERTY
5605-5621 Northeast 105th Avenue
Portland, Multnomah County, Oregon 97220

Prepared for:
Crest Partners

January 25, 2023
Project Number: CRPTCA003.05

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SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

This Phase I Environmental Site Assessment (ESA) Report documents the research methodology used by qualified environmental professionals of Rimkus Consulting Group, Inc., DBA Blackstone Consulting LLC (Blackstone) to identify recognized environmental conditions using the scope and limitations of ASTM Standard Practice E1527-21 and the December 15, 2022, proposal (Agreement) between Crest Partners and Blackstone.

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

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EXECUTIVE SUMMARY

Rimkus Consulting Group, Inc., DBA Blackstone Consulting LLC (Blackstone) performed a Phase I Environmental Site Assessment (Phase I ESA) of the 4.212-Acre Industrial Property located at 5605-5621 Northeast 105th Avenue in Portland, Multnomah County, Oregon (subject property). The purpose of the Phase I ESA is to identify recognized environmental conditions (RECs) in accordance with ASTM Standard E1527-21 and other agreed-upon ASTM *Non-Scope Considerations (Business Environmental Risk Issues)*. Blackstone understands that this assessment is being performed for a potential acquisition.

SUBJECT PROPERTY INSPECTION DETAILS

Name of Inspector: Brandy Groves

Date of Inspection: December 19, 2022

Subject Property Representative: Garry Gossett, President of 205 Real Estate Inc (owner representative), and Kenny Houser, Senior Associate Broker with Capacity Commercial Group (real estate broker)

SUBJECT PROPERTY DESCRIPTION

Street Address: 5605-5621 Northeast 105th Avenue

City and State: Portland, Oregon

County: Multnomah

Legal Description: Multnomah County Property IDs: R235901 and R235902

Owner: 205 Real Estate Inc

Size: Approximately 4.212 acres (per the Multnomah County Assessment & Taxation)

Use/Operations: Storage of vehicles, boats, RVs, wrecked vehicles, and vehicle parts

Building(s) (Type and Size): Single-story office – 3,264 square feet (sf) (per the Offering Memo)
Warehouse with mezzanine level – 3,072 sf (per the Offering Memo)
Two single-story warehouses – 8,514 sf (per the Offering Memo)
Single-story garage – sf not reported
Two sheds – sf not reported

- Year(s) Built:** Circa 1960s (garage) and circa 1973 – 1980s (office, warehouses, and sheds)
- Other Features:** Exterior features include limited asphalt and concrete paved parking and entry drive, gravel and dirt open areas, a retention/bio-swale area in the western portion, chain link fencing along the east and south perimeters, and a combination of wood and corrugated metal fencing along the west and north perimeters of the subject property.

HISTORICAL SUMMARY

Reasonably ascertainable historical information indicates the subject property consisted of vacant land, agricultural land, and a pond/flooded areas on the western majority and residences and associated improvements (garages and out-buildings) on the eastern edge, along NE 105th Avenue, from as early as 1935. By 1960, the northwestern portion of the subject property was used for auto storage and/or salvage, the southwestern portion remained vacant, and residences and the present-day garage building (originally associated with a residence) remained on the southeastern corner. The majority of the subject property was developed as the present-day auto salvage facility, including the present-day maintenance shop, in the early 1970s. The present-day office, warehouses, and sheds were constructed by 1981. The residences were removed from the southeastern corner of the subject property in the 1980s, leaving only the present-day garage in that area. The subject property was occupied as an auto salvage yard identified as 205 Auto Salvage from circa 1972 until 2021, which performed vehicle dismantling, storage, scrap, and parts sales. Since 2021, the subject property has been used by tenants to store vehicles, boats, RVs, and wrecked vehicles.

The adjoining properties generally consisted of undeveloped, agricultural, and ponded land with areas of residential development from at least 1935. The present-day north adjoining multi-tenant business park was constructed in the 1980s. The east adjoining were developed across NE 105th Avenue were developed with the present-day commercial/light industrial properties in the 1970s and 1990s. The south and west adjoining properties were developed with the present-day industrial buildings circa 1975.

SUMMARY OF FINDINGS AND OPINIONS

Blackstone performed a Phase I ESA of the subject property in conformance with the scope and limitations of ASTM Standard Practice E1527-21, the regulations at 40 CFR Part 312, and the December 5, 2022, proposal (Agreement) between Crest Partners and Blackstone. Any exceptions to, or deletions from, this practice are described in Sections 1.2 through 1.4 of this report. This assessment has revealed the following *recognized environmental conditions (RECs)*, *historical recognized environmental conditions (HRECs)*, *controlled recognized environmental conditions (CRECs)*, and/or *significant data gaps* in connection with the subject property:

- **Open Regulatory Case:** The subject property (205 Auto Salvage) is identified on several regulatory databases associated with an unresolved Environmental Cleanup Site Information (ECSI) case. The

regulatory database listings and other documents provided indicate that stormwater from the subject property was determined to flow onto the west adjoining property, then to Johnson Lane farther west, which has been impacted by PCB-containing sediments and is being assessed and remediated as a part of the Columbia Slough Study Area. The Oregon Department of Environmental Quality (ODEQ) requested information from the subject property owner related to polychlorinated biphenyls (PCBs) and metals in surface runoff. The subject property initially received a No Further Action (NFA) from the ODEQ in 1997; however, in 2003, the status of the subject property was changed from NFA to “site evaluation” due to PCB-containing sediment identified at the west adjoining (downgradient) property (Meyers Containers). The ODEQ subsequently requested a stormwater source control evaluation (SCE) of the subject property in 2012. The SCE was not completed for the subject property. The subject property is identified with multiple violations and non-compliance notices related to stormwater runoff from 2017 through 2021 (further discussed below). The auto salvage operations were reported to have ceased in June 2021.

Blackstone was provided a limited subsurface investigation performed on the subject property in 2020, which included limited sampling in the area of the on-site pond and the open area on the southwestern majority of the subject property, which did not identify elevated PCBs but did identify various metals above background and screening levels. Blackstone has not been provided any information related to the agency review of the investigation, nor any information indicating the resolution of the ESCI case. Based on the limited sampling performed and the open regulatory status, the ESCI case associated with the subject property is considered a REC.

- **Long-Term Auto Salvage Use of Subject Property:** Portions of the subject property have been used as an auto storage and/or salvage yard since at least 1960, and the entire subject property was occupied as an auto salvage facility (as 205 Auto Salvage) from circa 1972 until 2021. Operations associated with auto salvage include the draining, removal, and handling of used auto fluids and other hazardous waste (such as gasoline and diesel, mercury-containing switches, used motor oil, anti-freeze, hydraulic fluids, and batteries). Under the best control measures, auto salvage operations frequently impact the surface soil in operational and vehicle storage areas with various petroleum, metals, and other contaminants due to the accumulation of small-scale spills (including drips and drabs) over time, while larger releases create the potential for additional impacts to deeper soil and/or groundwater. General staining was observed within the interior of the maintenance and warehouse buildings and exterior surface areas.

There is no report of the use of underground storage tanks (USTs), subsurface auto lifts, or wastewater control systems, such as floor drains, oil/water separators, or clarifiers, on the subject property, and no record of reported spills or releases (other than the ESCI case discussed above). However, the auto salvage operations were performed on the subject property for at least 20 years before the establishment of modern regulations regarding the handling of hazardous materials and waste and continued for at least 40 years after. Blackstone was provided with a limited subsurface investigation performed in 2020 that included the completion of a ground penetrating radar (GPR) and limited soil sampling on portions of the subject property. No evidence of USTs or other environmental concerns was reported during this investigation. Concentrations of arsenic, cadmium, chromium, and lead exceeding background levels and select screening levels were detected. The investigation did not cover the entire subject property (specifically excluded were

areas surrounding the subject property buildings) and the results were not adequate to determine if impacts on the subject property are considered a threat to human health or the environment. As such, the long-term use of the subject property as a salvage yard is considered a REC.

- **On-Site Underground Injection Control (UIC) Well:** According to the regulatory database reviewed, three UIC wells are registered for industrial stormwater drainage (UIC #11673) on the subject property. The UIC wells are located beneath a concrete lid observed in the northeast portion of the subject property, immediately south of the easternmost warehouse. Access to the UIC wells was not provided during the assessment. According to the Subject Property Representative, the wells assist with stormwater drainage from Northeast 105th Avenue (to the east) and are owned and maintained by the municipality. It is presumed that the wells are connected to the surface drainage inlet located in the parking lot on the eastern portion of the subject property, and receive surface drainage from the street and east adjoining properties. No additional information regarding the configuration or condition of the UIC wells has been identified. Based on the unknown configuration and condition of the UIC wells, and the potential for contaminants associated with surface runoff from the roadway and adjoining properties to have been released to the subsurface on the subject property, the on-site UIC wells are considered a REC.
- **Current/Prior Use of Adjoining Properties:** Recycling operations (including metal recycling) have been identified at the west-southwest adjoining property since the 1970s, and the south adjoining property since the early 2000s. Regulatory listings associated with the west-southwest adjoining property identified hazardous waste generation and management (before the establishment of modern regulations), and ODEQ involvement recommending further investigation. Blackstone encountered no evidence of comprehensive environmental investigations into historical adjoining property uses from ODEQ online resources; therefore, based on the inferred groundwater flow direction to the north-northeast (toward the Columbia River) and the close proximity to the subject property, the use of the south and west-southwest adjoining properties as recycling facilities are considered a REC.

The following *Business Environmental Risk Issues* were identified in connection with the subject property:

- **Stormwater Permit:** The former operations on the subject property as an auto salvage facility necessitated that stormwater discharges be regulated under the NPDES 1200-Z Industrial Stormwater General Permit, which was initially required in 2001. This permit required stormwater monitoring, and, if applicable, implementation of corrective actions to maintain compliance. Prior reports indicate that the subject property received several notices of noncompliance from the City of Portland Bureau of Environmental Service (BES) that included failure to collect and analyze samples (2017/2018 and 2018/2019 permit years), failure to meet inspection requirements, failure to meet monitoring requirements, record keeping violations, inadequate Stormwater Pollution Control Plan, and failure to submit Discharge Monitoring Reports. In addition, the ODEQ issued a notice of civil penalty on January 2, 2020, and a notice requiring 205 Auto Salvage to construct a Tier II stormwater impoundment by June 6, 2021. The stormwater impoundment was not developed, and 205 Auto Salvage reportedly ceased operations on June 30, 2021, and sent a notification of the termination of the 1200-Z Permit to BES in March 2022. In September 2022, the ODEQ terminated the industrial and stormwater permits. The owner of the subject property is

reportedly negotiating a settlement for all outstanding stormwater violations.

- **Hazardous Substances:** Blackstone observed used tires, engine parts, a 55-gallon drum (labeled as Mercedes Benz Genuine Engine Oil that appeared to be empty), and numerous 5-gallon buckets of hydraulic oil on the ground surface throughout the subject property storage yard. Considering Blackstone observed no physical evidence of spills or releases related to these specific materials, the observed on-site hazardous substances are not considered a REC. However, Blackstone recommends properly storing (i.e., with secondary containment and/or spill protection) and/or disposing of these materials in accordance with all applicable regulations.
- **Asbestos-Containing Materials (ACM):** Based on the construction date of the subject property buildings (circa 1960s to 1980s) and the limited nature of Blackstone's visual survey, Blackstone recommends preparing and implementing a subject property-specific Asbestos Operations and Maintenance (O&M) Program. In addition, Blackstone recommends compliance with Occupational Safety and Health Administration (OSHA) regulations requiring the identification of presumed ACM as well as training, notification, and labeling requirements in operational areas.

The Executive Summary is only intended to represent a brief summary of our findings and is not a detailed account of all the information provided in this report. The report should be reviewed in its entirety prior to drawing any final conclusions as to potential environmental conditions associated with the subject property.

1 INTRODUCTION

1.1 PURPOSE

Rimkus Consulting Group, Inc., DBA Blackstone Consulting LLC (Blackstone) performed a Phase I Environmental Site Assessment (Phase I ESA) of the 4.212-Acre Industrial Property located at 5605-5621 Northeast 105th Avenue in Portland, Multnomah County, Oregon (subject property).

The purpose of this Phase I ESA is to investigate and identify *recognized environmental conditions (RECs)* associated with the subject property and/or surrounding properties. ASTM Standard Practice E1527-21 defines RECs 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 a future release to the environment.

A de minimis condition is not a recognized environmental condition. A de minimis condition is 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 governmental agencies.

Additionally, this Phase I ESA was conducted to identify *controlled recognized environmental conditions (CRECs)* associated with the subject property and/or surrounding properties. ASTM Standard Practice E1527-21 defines CRECs as:

A recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations).

This Phase I ESA also was conducted to identify *historical recognized environmental conditions (HRECs)* associated with the subject property and/or surrounding properties. ASTM Standard Practice E1527-21 defines HRECs as:

A previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations). A historical recognized environmental condition is not a recognized environmental condition.



This practice is generally intended for the User to satisfy one of the requirements to qualify for the *innocent landowner, contiguous property owner, or bona fide prospective purchaser* limitations on CERCLA liability; that is, this practice constitutes all appropriate inquiries (AAI) into the previous ownership and uses of the subject property consistent with good commercial or customary practice as defined at 42 U.S.C. §9601(35)(B) and the regulations at 40 CFR Part 312.

ASTM *Non-Scope Considerations (Business Environmental Risk Issues)* are detailed in Section 1.3 and outlined in the December 5, 2022, proposal and scope of work (Agreement) between Crest Partners and Blackstone.

1.2 SPECIAL TERMS AND CONDITIONS

This Phase I ESA has been conducted in accordance with ASTM Standard Practice E1527-21, the regulations at 40 CFR Part 312, and the Agreement between Crest Partners and Blackstone. Qualifications of the professionals who conducted this assessment are provided in the appendices.

Blackstone performed the professional services, obtained findings, rendered conclusions, and prepared recommendations in accordance with generally accepted practices of other environmental consultants undertaking similar assessments at the same time in the same geographical area.

Historical and environmental information pertaining to the subject property is included in this report to the extent that such information is *practically reviewable*, as defined in the above-referenced standard practice.

1.3 SCOPE OF SERVICES

As detailed in the Agreement, this Phase I ESA was conducted in accordance with the industry standard ASTM Standard Practice E1527-21 and in accordance with all appropriate inquiries (AAI) into the previous ownership and uses of the subject property consistent with good commercial or customary practice as defined at 42 U.S.C. §9601(35)(B) and the regulations at 40 CFR Part 312. This Phase I ESA included the following services:

1. A subject property inspection to identify and evaluate potential sources of RECs such as underground storage tanks (USTs), aboveground storage tanks (ASTs), equipment containing polychlorinated biphenyls (PCBs), waste and chemical storage areas, air emissions, and wastewater and stormwater discharges; the inspection included observations for evidence of chemical spills, releases, or on-site waste disposal;
2. A review of subject property records and interviews with subject property representatives with regard to current and former subject property operations to identify known or potential environmental concerns;
3. A visual survey of the properties in the vicinity of the subject property to evaluate the potential

for RECs at the subject property from these properties;

4. A review of historical information to identify RECs at the subject property from historical on-site and off-site uses; to the extent feasible under the conditions of the assessment, the historical information obtained included verbal information from the subject property and/or local agency representatives; in addition, some or all of the following records, where *publicly available* and *practically reviewable*, were reviewed: construction plans, zoning maps, building permits, property record cards, topographic maps, fire insurance maps, historical city directories, and aerial photographs; and
5. A review of State and Federal environmental database information.

In addition, to identify ASTM *Non-Scope Considerations (Business Environmental Risk Issues)* in addition to the ASTM requirements and as required per the Agreement, Blackstone also performed document research, visual and/or sampling surveys, and interviews for the presence of:

- Asbestos-Containing Materials (ACM),
- Lead-Based Paint (LBP),
- Radon Gas,
- Apparent Mold Growth (AMG) and moisture intrusion conditions conducive to mold growth,
- Drinking Water Quality,
- Permitted Air Emissions, and
- Wetlands.

The scope of this Phase I ESA did not include surface water, soil, soil vapor, or groundwater sampling. Consequently, conclusions provided with regard to surface water, soil, soil vapor, and groundwater impacts are limited to those that can be formed based on a non-intrusive investigation. The absence of environmental hazards in the subsurface cannot be guaranteed based on conditions observed on the surface.

Where performed, the limited ACM, LBP, AMG, and radon surveys are intended to provide an indication of the potential for significant environmental issues associated with these ASTM *Non-Scope Considerations (Business Environmental Risk Issues)*. Hidden materials or locations such as those inside walls, inaccessible attics, and inside ductwork and piping were not evaluated. As such, these surveys should not be regarded as comprehensive surveys for demolition or renovation purposes or indoor air quality health risk assessments, vapor intrusion into buildings, or explosion hazards.

1.4 SIGNIFICANT ASSUMPTIONS AND DATA GAPS

The subject property inspection consisted of a walkover of the subject property perimeter and exterior subject property areas, and a walk-through of the common areas, storage areas, warehouse areas, and grounds. Blackstone walked through the building interiors at the direction of the Subject Property Representative. Not all common spaces, storage areas, or warehouse areas were observed. Furthermore, during the subject property inspection, Blackstone did not inspect inaccessible areas of the subject

property including beneath parked motor vehicles, under manholes, or within locked utility vaults. In addition, heavy rain conditions at the time of the subject property inspection limited Blackstone's ability to identify the extent of staining on exterior ground surfaces. The adjoining properties were visually observed from curbside without being entered. Blackstone has no reason to believe the inability to inspect these areas would alter the findings or recommendations set forth in this report or be considered a significant data gap.

The historical information reviewed for the subject property did not confirm the first developed use of the subject property. *Data failure*, as defined by ASTM, has occurred in attempting to identify obvious uses of the subject property back to the first developed use, or back to 1940, whichever is earlier. Useful information regarding the use of the subject property prior to 1935 (at which time the subject property was developed for residential and/or agricultural uses) was not available from the *standard historical sources* (including available aerial photographs, fire insurance maps, property tax files, recorded land title records, USGS topographic maps, local street directories, building department records, or zoning/land use records). There were no other reasonably ascertainable historical sources available for review that were considered sufficiently useful. It is the opinion of Blackstone that the data failure does not represent a significant data gap that impacts our ability to identify RECs.

Conclusions stated herein are based upon publicly available information and other documented sources. Blackstone has assumed, where reasonable, that the information reviewed is true and accurate. Blackstone assumes no responsibility for inaccurate information that is not otherwise obvious in light of information of which Blackstone has actual knowledge. Blackstone's subject property observations are of the conditions observed at the time of the assessment.

Blackstone reviewed an environmental database search report. Blackstone's conclusions based on the search report are limited to the accuracy of that report. To the extent possible, Blackstone's field observations are used to verify the information or identify errors and inconsistencies in the search report regarding the listed facilities in the immediate vicinity of the subject property.

This report provides an estimation of groundwater flow direction at the subject property based on visual observations and topographical data. This assessment did not include groundwater sampling and water table elevation measurement. True groundwater flow direction can only be determined through direct measurement of groundwater elevations from properly installed on-site groundwater monitoring wells. The groundwater flow direction estimation should not be considered a true measurement of groundwater flow direction.

1.5 REPORT VIABILITY

Per ASTM Standard Practice E1527-21, a Phase I ESA is presumed to be viable when it is conducted within 180 days prior to the date of acquisition of the *subject property* (or, for transactions not involving an acquisition, the date of the intended transaction).

The dates of the components presented for *interviews*, review of government records, visual inspections, and declaration by *environmental professional*, are provided below. Completion of searches for recorded



environmental cleanup liens is a *User* responsibility; however, if the *User* has engaged Blackstone to conduct these searches, the date will be identified below.

TABLE OF CRITICAL DATES

Visual Inspection	December 19, 2022
Interviews with owners, operators, and occupants	December 19, 2022
Declaration of Environmental Professionals	January 25, 2023
Review of federal, tribal, state, and/or local government records	December 29, 2022
Environmental Lien Search	N/A*

*N/A = Not included within the scope of work

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2 USER PROVIDED INFORMATION

As defined under ASTM Standard Practice E1527-21, Crest Partners is considered the “User” of this Phase I ESA report. To qualify for one of the *Landowner Liability Protections (LLPs)* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2002 (the “*Brownfields Amendments*”), the User should provide certain information based on their relationship to the purpose of the due diligence and as required by 40 CFR 312.25, 312.28, 312.29, 312.30, and 312.31.

The information requested from the User and associated responses are outlined below in Section 2.2.

The owner’s representative, Garry Gossett, President of 205 Real Estate Inc., and Kenny Houser, Senior Associate Broker with Capacity Commercial Group (collectively the “Subject Property Representative”), provided information about the subject property, which is discussed in Section 2.3.

2.1 REASON FOR PERFORMING THE PHASE I ESA

Blackstone understands that this assessment was performed for Crest Partners as the potential purchaser of the subject property. As such, this Phase I ESA was conducted in an effort to qualify for the *innocent landowner, contiguous property owner, and bona fide prospective purchaser* defense to CERCLA liability and performed as an appropriate risk management and due diligence standard for real estate transactions in accordance with general industry standards which include ASTM Standard E1527-21 and the regulations at 40 CFR Part 312.

2.2 ASTM E1527-21 USER QUESTIONNAIRE

The User Questionnaire was completed and returned to Blackstone and is included in the appendices. The information requested and associated User responses are outlined below:

INFORMATION REQUESTED	USER RESPONSE (YES, NO, OR UNKNOWN)
<i>Environmental liens (40 CFR 312.25) and activity and land use limitations (AULs) (40 CFR 312.26(a)(1)(v) and (vi))</i>	Unknown*
Did a search of land title records (or judicial records where appropriate) identify environmental liens and/or AULs (such as engineering controls, land use restrictions, or institutional controls) that are in place at the subject property and/or have been filed or recorded against the subject property under federal, tribal, state or local law?	
<i>Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28)</i>	No

As the User, do you have any specialized knowledge or experience related to the *property* or nearby properties?



INFORMATION REQUESTED

**USER RESPONSE
 (YES, NO, OR UNKNOWN)**

Relationship of the purchase price to the fair market value of the subject property if it were not contaminated (40 CFR 312.29)

Yes

Does the purchase price being paid for this property reasonably reflect the fair market value of the property and has not been reduced due to contamination known or believed to be present at the property?

Commonly known or reasonably ascertainable information about the subject property (40 CFR 312.30)

Yes

Are you aware of commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases (such as past uses of the subject property, specific chemicals that are present or once were present at the subject property, spills or other chemical releases that have taken place at the subject property, and environmental cleanups that have taken place at the subject property)?

The User provided Blackstone with prior environmental reports for the subject property, which are further discussed in Section 6.7.

The degree of obviousness of the presence or likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).

No

As the User, based on your knowledge and experience related to the subject property, are there any obvious indicators that point to the presence or likely presence of releases at the subject property?

*The User did not request Blackstone to perform a Lien and AUL search as part of the scope of work. Nor was this documentation provided to Blackstone. In accordance with ASTM E1527-21, Blackstone reviewed an environmental database search report that included a search of institutional control and engineering control databases as further discussed in Section 7.

2.3 OWNER, KEY SITE MANAGER, AND OCCUPANT INFORMATION

Blackstone interviewed the Subject Property Representative (also identified as the Key Site Manager and owner representative) regarding environmental conditions at the subject property.

According to Mr. Gerry Gossett, President of 205 Real Estate Inc., the subject property was originally single-family residences and garages. His father purchased the subject property in 1973 and converted the subject property into a salvage yard (autos disassembled and stored on-site). Mr. Gossett stated that one of the original garages remains on-site and the other structures were built sometime between 1973 and 1988. Mr. Gossett stated that the subject property was used as a salvage yard from 1973 until approximately three years ago when they started clearing the subject property for a potential sale. He currently has "tenants" who rent land to store their vehicles, boats, RVs, and wrecked vehicles. Mr. Gossett stated that a detention bio-swale area is located along the western perimeter.

Mr. Gossett stated they formerly had a National Pollutant Discharge Elimination System (NPDES) permit since the 1990s but it was terminated by the Oregon Department of Environmental Quality (ODEQ) on September 8, 2022. Sampling was required at the detention area four times a year. Several hits of E.coli

were reported; however, Mr. Gossett stated that it was from the southwest adjoining Republic facility improperly hosing down their waste bins, and trucks and the run-off coming on his property, and he indicated that the issue has been resolved (no sampling has been conducted in the past 2-3 years).

Mr. Gossett stated that a UIC structure is located near the warehouse building that was installed before 1973 by the City of Portland, which serves the parking lot and most of the street along 105th. As further discussed in Section 8, the top of the UIC structure was observed but was not accessible during the subject property inspection.

According to the Phase I Environmental Site Assessment Subject Property Owner Questionnaire completed by Mr. Gossett (dated December 17, 2022), “the DEQ proposed enforcement of stormwater discharge exceedances of the 1200-Z Stormwater Permit, which were resolved. The DEQ listed the Property on its Environmental Cleanup Sites Inventory as a suspect source of PCBs. MFA’s Focused Phase II ESA report established there was no basis for DEQ’s suspicion. Once the Purchase and Sale Agreement is signed, 205 Real Estate will provide the reports.” Mr. Gossett was unaware of any Environmental Liens or Activity Use Restrictions for past or current reported releases.

2.4 PAST OWNERS, OPERATORS, AND OCCUPANT INTERVIEWS

In accordance with ASTM Standard Practice E1527-21, interviews with past owners, operators, and occupants shall be conducted to the extent that they have been identified and that the information likely to be obtained is not duplicative of information already obtained. Blackstone has no reason to believe that such interviews were necessary for this subject property or would alter the findings or recommendations set forth in this report.

2.5 REPRESENTATION AND RELIANCE

The work performed for this assessment is consistent with the standards of care and skill ordinarily exercised by members of the profession currently practicing in the same locality under similar conditions. No other representation, expressed or implied, and no warranty or guarantee is included or intended in the report.

Crest Partners may rely on this report subject to the terms and conditions of the Agreement between Crest Partners and Blackstone. No other person may rely on this report without written authorization from Blackstone and Crest Partners. If any of the above limitations conflict with the Agreement, the Agreement governs.

3 SUBJECT PROPERTY DESCRIPTION

3.1 SUBJECT PROPERTY CHARACTERISTICS AND FEATURES

Street Address:	5605-5621 Northeast 105th Avenue
City and State:	Portland, Oregon
County:	Multnomah
Legal Description:	Multnomah County Property IDs: R235901 and R235902
Owner:	205 Real Estate Inc
Size:	Approximately 4.212 acres (per the Multnomah County Assessment & Taxation)
Zoning:	IG2 (General Industrial 2)
Use/Operations:	Storage of vehicles, boats, RVs, wrecked vehicles, and vehicle parts
Building(s) (Type and Size):	Single-story office – 3,264 square feet (sf) (per the Offering Memo) Warehouse with mezzanine level – 3,072 sf (per the Offering Memo) Two single-story warehouses – 8,514 sf (per the Offering Memo) Single-story garage – sf not reported Two sheds – sf not reported
Year(s) Built:	Circa 1960s (garage) and circa 1973 – 1980s (office, warehouses, and sheds)
Construction Materials:	The office has a concrete slab on grade, wood-framed exterior walls finished with painted wood siding and brick veneer, a wood-framed flat roof with a built-up membrane (reported), and a mansard finished with corrugated metal. The garage building has a concrete slab on grade, wood-framed exterior walls finished with wood plank siding or exposed substrate, and a wood-framed pitched roof with corrugated metal. The warehouses have concrete slabs on grade, wood and metal framing components, and corrugated metal exterior walls and roof coverings. The two sheds are raised wood framed structures with either corrugated metal or painted wood plank siding exteriors.
Heating/Cooling Systems:	Heating in select locations is provided by electric hung units and the office has a through-window air conditioner. Domestic hot water is not provided.
Other Features:	Exterior features include limited asphalt and concrete paved parking and

entry drive, gravel and dirt open areas, a retention/bio-swale area in the western portion, chain link fencing along the east and south perimeters, and a combination of wood and corrugated metal fencing along the west and north perimeters of the subject property.

A Subject Property Location Map depicted on the local U.S. Geological Survey (USGS) topographic quadrangle, a Subject Property Plan, and Subject Property Photographs are included in the appendices.

3.2 UTILITIES

Electricity Provider: Portland General Electric

Natural Gas Provider: NW Natural

Potable Water: City of Portland

Sewer Services: City of Portland

According to the Subject Property Representative, the present-day subject property buildings have been connected to the municipal systems for sanitary sewage disposal and potable water supply until developed with the present-day office and warehouse areas before 1980.

The subject property was historically developed with residences on the eastern portion from at least 1935 until the 1980s. The former structures reportedly utilized septic systems. Based on the residential use, the historical septic systems on the subject property are not considered a REC.

No RECs were identified as a result of the review of the subject property as described in this section of the report.

4 VICINITY RECONNAISSANCE

The subject property is located in Portland, Multnomah County, Oregon, within an area characterized by commercial/industrial development. Adjoining property use is summarized as follows:

ADJOINING PROPERTY USE

North:	Mini-storage facility (5635 Northeast 105 th Avenue) and the I-205 Business Park (5663, 5701, 5705, and 5717 Northeast 105 th Avenue)
East:	Northeast 105 th Avenue followed by Airport Drayage Co parking lot (5644 Northeast 105 th Avenue), Marx and 105 th municipal pump station, Consolidated Supply Co (5536 Northeast 105 th Avenue), Smart Start Ignition Interlock (5528 Northeast 105 th Avenue) and SGP Development (5512 Northeast 105 th Avenue)
Southeast:	Northeast 105 th Avenue followed by Parkrose Auto & Truck Repair (5414 Northeast 105 th Avenue)
South:	Evergreen Machine Works (5317 Northeast 105 th Avenue), Complete Fusion Welding (5313 Northeast 105 th Avenue), Kings Roofing (10319 Northeast Marx Street), and Anfield & Sons Metal Recyclers (10251 Northeast Marx Street)
West-Northwest:	Yard for former drum reconditioning and intermediate bulk container processing facility (10103 Northeast Marx Street)
West-Southwest:	Republic Services (10239 Northeast Marx Street)

SOURCE

FINDINGS

Field observations	From accessible vantage points, Blackstone identified no outdoor chemical or waste storage, wastewater treatment facilities, or other operations that may impact the subject property, and no pits, ponds, or lagoons for apparent discharge and/or treatment of actively generated industrial process water were observed.
Environmental databases search	Adjoining and/or nearby properties identified in the environmental databases searched are further discussed in Section 7.
Vicinity Reconnaissance	As discussed in Sections 6.8 and 7.1, the south and west-southwest adjoining properties are considered RECs.

5 PHYSICAL SETTING

The following summarizes the physical setting of the subject property based on information provided in available resources:

SUMMARY OF PHYSICAL SETTING

<i>Item</i>	<i>Findings</i>	<i>Reference</i>
Surficial Soils Beneath Subject Property	Silt loam	USDA NRCS Web Soil Survey and EDR Report
Depth to Bedrock	Greater than 17 feet bgs	Oregon Department of Environmental Quality (ODEQ)
Topography	The subject property is generally flat, and the surrounding area exhibits a slight slope to the north-northeast	USGS <i>Mount Tabor, Oregon</i> topographic map and subject property observations
Elevation	Between approximately 15 and 20 feet amsl	USGS <i>Mount Tabor, Oregon</i> topographic map
Depth to Shallow Groundwater	Greater than 17 feet bgs	ODEQ
Estimated Groundwater Flow Direction	North-northeast in the direction of the Columbia River	USGS <i>Mount Tabor, Oregon</i> topographic map

USDA NRCS: United States Department of Agriculture Natural Resources Conservation Service

EDR Report: Environmental Data Resources Database Report

bgs: below ground surface

USGS: United States Geological Survey

amsl: above mean sea level

No RECs were identified as a result of the physical setting records review.

6 HISTORICAL INFORMATION REVIEW

As part of this Phase I ESA, Blackstone reviewed historical information to identify RECs associated with the historical use of the subject property and surrounding properties. Blackstone obtained historical information from interviews with subject property representatives and other individuals familiar with the subject property as well as aerial photographs, historical maps, and other *practically reviewable* standard historical sources that are considered *reasonably ascertainable*.

6.1 HISTORICAL FIRE INSURANCE MAPS

Environmental Data Resources, Inc. (EDR) searched available historical fire insurance maps for the subject property and subject property vicinity. Historical fire insurance maps are scaled drawings that indicate the location and use of building structures present in a given area from as early as the late 1800s. The maps provide information regarding the development and historical use of subject property structures and can indicate the historical presence of tanks at the subject property and other potential environmental concerns.

According to EDR, historical fire insurance maps are not available for the subject property area. A summary of the map search is provided in the appendices.

6.2 AERIAL PHOTOGRAPHS

EDR provided aerial photographs of the subject property area, which are included in the appendices and summarized below. The following table includes descriptions of the subject property and surrounding properties on the earliest aerial photographs available and only includes significant changes in subsequent years.

SUMMARY OF HISTORICAL AERIAL PHOTOGRAPH REVIEW

Year	Subject Property	Adjoining Properties
1935 1948 1951 1955	Agricultural, ponding, and wooded land, with residences and outbuildings in the eastern portion	Agricultural land, orchards, and scattered rural dwellings with a stream to the north
1960	Material storage and/or a salvage yard visible in the northwest and central portions	No significant changes
1963	The western portion appears to have been cleared; however, image quality precludes definitive review.	Commercial development with areas of disturbance appear south
1970	Materials storage and/or a salvage yard in the northern portion, vacant land in the southern portion, and residences in the eastern portion	No significant changes

SUMMARY OF HISTORICAL AERIAL PHOTOGRAPH REVIEW

<i>Year</i>	<i>Subject Property</i>	<i>Adjoining Properties</i>
1975	The northern majority of the property appears as an auto storage or salvage lot, and a present-day maintenance building appears on the northeast portion.	Several of the present-day commercial/industrial properties visible to the east and south
1981	Present-day commercial buildings appear in the northeast corner, residences remain in the southeastern corner, and the remainder appears to be used as a salvage yard.	Several of the present-day commercial/industrial properties visible to the west-southwest
1990 1994 2001 2006 2011 2014 2016 2020	No significant changes	Present-day commercial/industrial properties visible in adjoining areas

Findings: As further discussed in Sections 6.8 and 7.1, the long-term use of the subject property as a salvage yard and the industrial use of the south and west-southwest adjoining (upgradient) properties are considered RECs. No other RECs were identified during the review of historical aerial photographs.

6.3 HISTORICAL TOPOGRAPHIC MAPS

EDR provided historical topographic maps of the subject property area, which are included in the appendices and summarized below. The following table includes descriptions of the subject property and surrounding properties on the earliest historical topographic maps available and only includes significant changes in subsequent years.

SUMMARY OF HISTORICAL TOPOGRAPHIC MAP REVIEW

<i>Year</i>	<i>Subject Property</i>	<i>Adjoining Properties</i>
1897 1905	No shading or structures	No shading or structures; water features depicted in nearby areas
1940	Depicted with two small structures in the eastern portion	Small structures depicted to the north, east, and south with no shading or structures to the west
1954 1961 1970	Depicted with four small structures in the eastern portion	Small structures depicted to the north and west, shading to the south, and no shading or structures to the west
1978	Depicted with six structures in the eastern portion	Depicted with structures to the north, east, and south of the subject property
1995	Grey shading denoting location within a densely developed area	Grey shading depicted throughout; present-day I-205 depicted to northwest
2014 2017 2020	This topographic map series does not include structures or shading (similar to a street map, except with contour lines).	

Findings: No RECs were identified as a result of the review of historical topographic maps.

6.4 CITY DIRECTORIES

EDR provided City Directories for the subject property and adjoining properties at approximately five-year intervals for the years spanning 1924 through 2017. The City Directory listings are included in the appendices and summarized below.

SUMMARY OF CITY DIRECTORY REVIEW

<i>Subject Property Listings</i>	
<i>Addresses Reviewed</i>	<i>Review Summary</i>
5605-5621 Northeast 105 th Avenue (current)	Not listed between 1924-1975, 1992, and 1995 205 Auto Salvage between 1977-1985 205 Auto Salvage and Garry Gossett 1999 Garry Gossett 2004 205 Auto Salvage Inc. between 2009-2017
5621 NE 105 th Avenue	Not listed between 1924-1940, 1950-1965, 1975, 1981, and 1992-2017 John E. Lindstrom 1946 Geo E. Rich between 1967-1970 Rollie M. Owens 1977 James Larimer 1980 205 Auto Salvage 1985
5541 NE 105 th Avenue	Not listed between 1924-1965, 1975, 1981, and 1992-2017 W H Ashenbrenner between 1967-1970 John Pike 1977 Auto Restoration 1980 No Return 1985
5515 NE 105 th Avenue	Not listed between 1924-1940, 1950-1967, 1975, and 1981-2017 Lester R. Thrush 1946 Charles Leaver 1970 Michi W. Guinn 1977 Richard A. Larimer 1980

Adjoining Properties

<i>Addresses Reviewed</i>	<i>Direction From Subject Property</i>	<i>Review Summary</i>
5701 NE 105 th Avenue	North	Not listed between 1924- 1981 and 1992 Gordy's Car Shoppe and Steve's Auto Restorations 1985 D&L Auto Detailing, Performance Tooling, and Portland Garage Door 1999 I-205 Business Park, Portland Garage Door, Strait Line, and Whirlwind Services, Inc. 2004 Vancouver and Portland Garage Door, 1-205 Business Park, and Whirlwind Services 2005 Fast Track Marketing, I-205 Business Park, and Poly

Adjoining Properties

<i>Addresses Reviewed</i>	<i>Direction From Subject Property</i>	<i>Review Summary</i>
		Production 2009 Cycle Specialties, Drillers Depot, Portland Garage Door, and R&T Machine LLC 2014 Cycle Specialties, Driller Depot, and Portland Garage Door 2017
5705 NE 105 th Avenue	North	Not listed between 1924-1981, 1992-2004, and 2009-2017 Domino's Pizza Commissary and Mailroom Systems Inc. 1985 Earthbound Flying Machines, GRMR Industries, Royalty Cabinets, The Disk Bench, China Farm Inc., and Tool Savers 2005
5717 NE 105 th Avenue	North	Not listed between 1924-2004 and 2009-2017 Terry R. Rouse, STB Coatings, Inc., and Ray Terrv 2005
5635 NE 105 th Avenue	North	Not listed between 1924-1967 and 1975-2017 Mast Linial 1970
5663 NE 105 th Avenue	North	Not listed between 1924-2004 and 2009-2017 North American Control Inc., Wingman Enterprises, Dan and Ginger Ness, Miracle Method of Salem and Portland, and Simpson Stints 2005
5723 North 105 th Avenue	North	Not listed between 1924-1940, 1950-1977, 1981, and 1992-2017 Clifford West 1946 Kathleen Birdsell 1980 Standard Utilities Contractors 1985
5644 NE 105 th Avenue	Northeast	Not listed between 1924-1965, 1975, 1981, 1992-1994, and 2009-2017 Everett G. Park and Calvin Bender 1967 Everett G. Park and Thos Popelka 1970 Ruth M. Rogers 1977 Larry Bird 1980 No Return 1985 Jim Nichols 1999 No Occupant between 2004 and 2005
5536 NE 105 th Avenue	East	Not listed between 1924-1975 and 1992-1994 Van Lom Concrete between 1977 and 1985 MJK Custom Steel Fab & Contractor 1999 Van Lom Concrete Inc. between 2004 and 2009 Altus Traffic Management between 2014 and 2017
5528 NE 105 th Avenue	East	Not listed between 1924-2004 and 2009-2017 Salvatore Auto Body Repair and NE Cisneros Construction Inc. 2005
5512 NE 105 th Avenue	East	Not listed between 1924-2004 and 2009-2017 A Rose City Rebar Inc., Steve Auto & Truck, and Doolittle Erectors Inc. 2005

Adjoining Properties

Addresses Reviewed	Direction From Subject Property	Review Summary
5414 NE 105 th Avenue	Southeast	Not listed between 1924-2004 and 2009-2017 Phantom Industries LLC and Parkrose Auto & Truck Repair 2005
5317 NE 105 th Avenue	South	Not included in the city directories
5313 NE 105 th Avenue	South	Not included in the city directories
10319 NE Marx Street	South	Not listed between 1924-1965 and 1981 Multnomah County Drainage Dist between 1967 and 1977 Mount Hood Kiwanis Camp for Crippled Children and Multnomah County Drainage Dist 1980 Kings Roofing Company between 1985 and 2004 Weinstein Equipment LP 2005 The King Roofing Company between 2009 and 2017
10251 NE Marx Street	South	Not listed between 1924-1940, 1950-1967, 1975, 1981, 1992-1994, and 2004 Olin R. Harrison 1946 Nicholas Bleys 1970 Ray E. Bunch 1977 Brad A. Williamson 1980 Blueline Construction 1985 Pace Construction Inc. 1999 Anfield & Sons Metal Recyclers LLC between 2005 and 2017
10239 NE Marx Street	West-Southwest	Not listed between 1924-1965, 1975, and 1992-1999 Julia B. Bond 1967 Vacant 1970 Fire Guard Sprinkler Systems between 1977 and 1985 Stargate Telcom Inc. and Pac Key Inc. 2004 Allied Waste Services of Portland 2005 Republic Services between 2014 and 2017
10103 NE Marx Street	West-Northwest	Not included in the city directories

***Tenants of potential environmental concern in bold**

Findings: As discussed in Sections 6.8 and 7.1, the long-term use of the subject property as a salvage yard and the use of the south and west-southwest adjoining properties as recycling facilities are considered RECs. No other RECs were identified during the review of historical city directories.

6.5 AGENCY RECORDS, INTERVIEWS, AND OTHER HISTORICAL SOURCES

In accordance with ASTM E1527-21, Blackstone requested subject property history and/or regulatory information regarding the subject property from federal, state, and/or local government officials. Information regarding the subject property is obtained from regulatory agency officials either by:

- 1) Conducting interviews by telephone or in-person at various federal, state, and/or local agencies; or



- 2) Requesting file information via submission of an open records request to the appropriate agency contact based upon applicable agency requirements, and in accordance with the Freedom of Information Act (FOIA).

Findings from the interviews/records review are summarized below:

SUMMARY OF AGENCY RECORDS, INTERVIEWS, AND OTHER HISTORICAL SOURCES

<i>Source</i>	<i>Information Requested</i>	<i>Findings</i>
DataTree at https://web.datatree.com/#/home	Typical ownership data, parcel information, and valuation data	No conditions of environmental concern were identified for the subject property. Typical subject property ownership, parcel size, dates of construction, and tax assessment data were obtained for the subject property and/or adjoining properties.
Multnomah County Department of County Management Assessment & Taxation Property Search Tools and Maps https://www.multco.us/assessment-taxation/property-search-tools-and-maps	Typical ownership data, parcel information, and valuation data	No conditions of environmental concern were identified for the subject property. Typical subject property ownership, parcel size, dates of construction, zoning information, and tax assessment data were obtained for the subject property and/or adjoining properties.
Oregon Department of Environmental Quality (ODEQ) Environmental Cleanup Site Information (ECSI) Database https://www.deq.state.or.us/lq/ECSI/ecsiquery.asp?listtype=lis&listtitle=Environmental+Cleanup+Site%20Information+Database	Hazardous materials incidents, spills, releases, enforcement actions, and other environmental concerns	Refer to Section 7.1 for information provided by ODEQ databases associated with the subject property and adjoining properties.
Leaking Underground Storage Tank Cleanup Site Database https://www.deq.state.or.us/lq/tanks/lust/lustpubliclookup.asp		
ODEQ Interactive Viewer https://hdcgcx1.deq.state.or.us/Html5viewer291/?viewer=FacilityProfilerLite		
City of Portland Developmental Services – Online Public Records Request	Permit information, building inspections, code violations, etc.	No conditions of environmental concern were reported.

SUMMARY OF AGENCY RECORDS, INTERVIEWS, AND OTHER HISTORICAL SOURCES

Source	Information Requested	Findings
City of Portland Fire Department and Environmental Services Bureau (BES) – Online Public Records Request	Hazardous materials, spills, and/or environmental investigation incidents, wells, septic, or storage tanks, etc.	No conditions of environmental concern were reported.
City of Portland Zoning Map at https://portlandmaps.com/bps/zoning/#/map/	Typical zoning information	Zoning information is provided in Section 3.
City of Portland Water Bureau https://www.portland.gov/water/water-quality/2022-drinking-water-quality-report	Water supply	Water quality is discussed in Section 9.5

Findings: As discussed in Sections 6.8 and 7.1, the long-term use of the subject property as a salvage yard and the use of the south and west-southwest adjoining properties as recycling facilities are considered RECs. No other RECs were identified during the review of information included in this section.

6.6 ENVIRONMENTAL LIEN/AUL SEARCH

As previously discussed in Section 2.2, an environmental lien and activity & use limitation (AUL) search was not included in the scope of this assessment and was not provided to Blackstone for review by the User.

6.7 PREVIOUS ENVIRONMENTAL REPORTS

Blackstone was provided with the following previous environmental reports for review regarding the subject property:

- *Phase I Environmental Site Assessment, 5605 NE 105th Avenue, Portland, Oregon*, prepared by Maul Foster & Alongi, Inc. (MFA) for 205 Real Estate, LLC, dated March 30, 2020 (2020 MFA ESA)
- *Focused Site Investigation Report (FSI), 5605 NE 105th Avenue, Portland, Oregon*, prepared by Maul Foster & Alongi, Inc. (MFA) for 205 Real Estate, LLC, dated March 30, 2020 (2020 MFA FSI)

At the time of the 2020 MFA ESA, the subject property was developed in its current configuration and occupied as an auto salvage facility (205 Auto Salvage). The historical use was reported as agricultural and residential use before the initiation of auto salvage operations in the 1960s, then the development of the current auto salvage facility (205 Auto Salvage) in the 1970s.

The 2020 MFA ESA included interviews with the current owner representative and a review of regulatory documents related to auto salvage operations. Based on the initial findings during the ESA process, MFA

completed the 2020 MFA FSI on the subject property to further assess issues identified during the process. The results of the 2020 MFA FSI were included in the 2020 MFA ESA.

The 2020 MFA FSI was reported to have been completed to confirm stormwater drainage features at the subject property, assess for the presence of underground storage tanks (USTs) under portions of the subject property (former residences), and evaluate subsurface conditions at the subject property to determine if any adverse impacts to soil have resulted from the auto salvage operations. The 2020 MFA FSI included a ground penetrating radar (GPR) survey of portions of the subject property, and the collection of composite soil samples from three specific areas, defined as Decision Units (DUs). The designated DUs included the area of stormwater ponding on the western portion near the subject property's outfall (DU-1), swale and potential runoff areas adjoining the Republic Services Inc. facility located to the adjoining west-southwest of the subject property (DU-2), and the remainder of the accessible areas of the salvage yard (DU-3). Composite soil samples were collected from the top 24 inches of soil in each area. Soil was reportedly screened for volatile organic compounds (VOCs) using a photo-ionization detector (PID), with no evidence of VOCs or visual/olfactory indications of contamination identified during screening. The soil encountered was described as gravel and silts, and no groundwater was encountered during the assessment. A single composite soil sample each from DU-1 and DU-2 and duplicate samples (two total) from DU-3 were submitted for laboratory analysis for full chain total petroleum hydrocarbons (TPH), PCBs, VOCs, Semi volatile organic compounds (SVOCs), and RCRA 8 metals. The laboratory results identified oil-range TPH in all areas but reported to be below residential screening levels. No gasoline or diesel range TPH or any VOCs were detected above laboratory reporting limits. PCBs and SVOCs were detected above laboratory detection limits but reported as below screening levels. The majority of metals identified were reported below background levels, except for arsenic, cadmium, chromium, and lead. Detections of arsenic ranging from 6.88 to 19.3 micrograms per kilogram (mg/kg) exceeded the direct contract concentration for occupational workers (which is 1.9 mg/kg). Cadmium and chromium are reported below applicable screening levels. Detections of lead exceeded the leaching to groundwater pathway for residential, urban residential, and occupational receptors. The drainage system location was confirmed during the GPR survey, and no USTs were identified in the limited area assessed (limited to the southeastern edge of the subject property).

The 2020 MFA ESA indicates that the subject property is listed on the Oregon Department of Environmental Quality's (ODEQ's) Environmental Cleanup Site Information (ECSI) database as Site No. 2087. The subject property was evaluated as part of a review of all sites within the Columbia Slough Study Area. Stormwater from the subject property flows to ponds located on the west adjoining property (former Meyers Container Corp), which then flows to a culvert under the I-205 and discharges to Johnson Lake farther west. Under the ECSI, the ODEQ requested the subject property owner evaluate the property for polychlorinated biphenyls (PCBs) and metals related to surface runoff. The subject property initially received a No Further Action (NFA) from the ODEQ in 1997; however, in 2003, the status of the subject property was changed from NFA to "site evaluation" due to PCB-containing sediment identified at the west adjoining (downgradient) property. The ODEQ subsequently requested a stormwater source control evaluation (SCE) be completed for the subject property in 2012. The SCE was not completed. At the time of the 2020 MFA ESA, the subject property's ECSI status was identified as requiring further action. The 2020 MFA ESA states that their FSI results indicated that all PCBs from the 205 Auto Salvage property were either non-detect or estimated values were all below ODEQ risk-based cleanup values. MFA concluded that the subject property salvage operations do not represent a threat to human health or the

environment. However, they concluded the open status of the ECSI case for the 206 Auto Salvage is considered a REC. *(As further discussed in Section 6.8, Blackstone considers the open ECSI case related to the subject property a REC)*

The 2020 MFA ESA did not identify any other RECs, nor CRECs, or HRECs in connection with the subject property. However, the following items were identified as *de minimis* conditions:

- The use of the subject property as an auto salvage yard since the 1970s, including the storage of spent automotive fluids and a waste oil AST. MFA indicated there are no reports of hazardous materials incidents or history of spills during their assessment. Areas of heavy staining were noted during their inspection and sheens were observed on the gravel storage yard. MFA indicated there is a potential for historical releases of petroleum products or chemicals to exist. However, MFA referenced the results of the 2020 MFA FSI as an indication that no petroleum products or associated constituents were observed in surface soils. Therefore, MFA indicated that the on-site operations have not adversely impacted the subject property, and they considered the historical use as a *de minimis* condition. *(As further discussed in Section 6.8, Blackstone considers the long-term auto salvage operations on the subject property a REC)*
- The UIC well was observed by MFA on the subject property and was identified in the regulatory databases reviewed. This feature was described as providing drainage to the paved parking lot located on the northeastern portion of the subject property and from a nearby roof drain. Due to these limited uses, MFA considered the UIC well to be a *de minimis* condition. *(As further discussed in Section 6.8, Blackstone considers the UIC wells on the subject property a REC)*
- The subject property is located in the area of the Columbia Slough watershed, which is listed as a confirmed release that needs further remedial action due to sediment impacts from stormwater runoff and wastewater. MFA concluded that the subject property's stormwater runoff is either filtered through an on-site UIC or flows to ponds located on the west adjoining property, which subsequently discharges to Johnson Lake farther west. Due to the historical information reviewed and the distance of the Columbia Slough to the subject property, MFA considered the likelihood of the subject property contributing to the waterway low. *(As further discussed in Section 6.8, Blackstone considers the open ECSI case a REC, which is related to the Columbia Slough watershed)*
- Numerous nearby properties have been occupied by industrial operations since the 1960s, including an oil company, metal fabricators, auto restoration and repair facilities, and metal coating facilities. MFA indicated that, based on their regulatory status and available information, these off-site operations are considered a *de minimis* condition. *(As further discussed in Section 6.8, Blackstone considers the long-term industrial use of select upgradient properties a REC)*
- Former residential use of the subject property indicates the potential for the presence of septic systems and water wells. Given the subsequent redevelopment, MFA indicated that the former septic systems represent a low environmental concern, and are considered *de minimis*. *(Blackstone concurs with this finding)*

In addition, MFA identified the following data gaps:

- The subject property was identified with corrective action and violation notices related to their

1200-Z Industrial Stormwater Permit, including letters of non-compliance regarding failure to submit certain documentation to the BES and ODEQ. DEQ issued a notice of civil penalty on January 6, 2020. 205 Auto Salvage was reported to have been in negotiations with the ODEQ to settle their outstanding stormwater compliance issues at the time of the 2020 MFA ESA. MFA considered the non-compliance issues and exceedances of stormwater benchmarks as a data gap. *(As further discussed, Blackstone considers the outstanding violations a Business Environmental Risk Issue in connection with the subject property)*

- MFA considered the historical agricultural use of the subject property and the potential for the use of agricultural chemicals as a data gap. *(Blackstone concurs with this finding)*
- It was reported that the property was historically filled in the 1970s from materials originating from an off-site construction site (identified as Lloyd's Center). No additional information related to fill materials was provided. MFA considered the unknown composition of the fill materials as a data gap. *(Blackstone concurs with this finding)*

The 2020 MFA ESA did not provide recommendations.

- *Letter: 205 Real Estate, LLC, Environmental Summary Report, 5605 NE 105th Avenue, Portland, Oregon, prepared by James C. Brown & Associates (JCBA) for 205 Real Estate, LLC, dated January 12, 2023 (2023 JCBA Environmental Summary)*

The 2023 JCBA Environmental Summary was prepared to summarize the current environmental conditions at the subject property and was reportedly provided in relation to 205 Real Estate, LLC's compliance with Section 5.2 of the Purchase and Sale Agreement with RMRE Investments. The letter breaks down the environmental summary into three subjects: Settlement of Stormwater Violations, Potential for Environmental Contamination, and Status of the Potential Purchaser Agreement (PPA). The 2023 JCBA Environmental Summary referenced several documents related to the termination of stormwater permits, the ECSI case summary, and correspondence with the ODEQ. These permits and letters were included with the summary and were also reviewed by Blackstone.

Settlement of Stormwater Violations - The summary indicates that JCBA was retained in 2018 to assist in resolving violations related to NDPES 1200-Z Stormwater Permit for the 205 Auto Salvage operations on the subject property. The 2023 JCBA Environmental Summary includes a discussion of the sources of stormwater runoff on the subject property, runoff associated with the west adjoining properties (Republic Waste and Meyers Container Corp), and the ECSI cases opened for the subject property and Meyers property. JCBA indicates that the Meyers property received No Further Action status following the investigation and remedial action performed. The JCBA discussion of the ECSI case for the subject property is consistent with the prior summary and indicates that an NFA was initially granted in 1997, but was rescinded in 2003 when PCB impacts were discovered on the west adjoining property. In 2012, ODEQ requested that 205 Real Estate (owner) perform a stormwater source control evaluation on the subject property. No further comment on the ECSI Case was provided by JCBA.

The 2023 JCBA Environmental Summary indicates that, as a result of exceedances of the stormwater permit, the subject property was required to construct of TIER II stormwater impoundment by June 2021 to control surface runoff. Lacking funds to construct the impoundment, 205 Auto Salvage elected to cease

operations at the subject property on or around June 20, 2021. JCBA indicates that the BES and ODEQ permits related to stormwater management were subsequently terminated in March and September 2022. JCBA also indicated that the subject property ownership has been in the process of negotiating a Settlement Agreement for all of the outstanding stormwater violations with the ODEQ, and a settlement proposal was submitted to the ODEQ in March 2022, that presents a proposal for settlement to be paid out of escrow upon closing of the sale of the subject property.

Potential for Environmental Contamination – The 2023 JCBA Environmental Summary provides a summary of the results of the 2020 MFA ESA and 2020 MFA FSI, similar to the discussion above.

Status of the Potential Purchaser Agreement – The 2023 JCBA Environmental Summary indicates that JCBA has initiated a conversation with ODEQ representatives and completed preliminary documentation related to the ODEQ’s Potential Purchaser Agreement (PPA) application for the subject property, which could be completed by the prospective purchaser.

Conclusion - In summary, the 2023 JCBA Environmental Summary concludes that upon payment of the civil penalties to ODEQ and associated entities, there are no further lingering environmental issues of concern at the subject property.

Copies of the previous environmental reports, letters, and supporting documents are included in the appendices.

6.8 HISTORICAL INFORMATION CONCLUSIONS

Reasonably ascertainable historical information indicates the subject property consisted of vacant land, agricultural land, and a pond/flooded areas on the western majority and residences and associated improvements (garages and out-buildings) on the eastern edge, along NE 105th Avenue, from as early as 1935. By 1960, the northwestern portion of the subject property was used for auto storage and/or salvage, the southwestern portion remained vacant, and residences and the present-day garage building (originally associated with a residence) remained on the southeastern corner. The majority of the subject property was developed as the present-day auto salvage facility, including the present-day maintenance shop, in the early 1970s. The present-day office, warehouses, and sheds were constructed by 1981. The residences were removed from the southeastern corner of the subject property in the 1980s, leaving only the present-day garage in that area. The subject property was occupied as an auto salvage yard identified as 205 Auto Salvage from circa 1972 until 2021, which performed vehicle dismantling, storage, scrap, and parts sales. Since 2021, the subject property has been used by tenants to store vehicles, boats, RVs, and wrecked vehicles.

Portions of the subject property have been used as an auto storage and/or salvage yard since at least 1960, and the entire subject property was occupied as an auto salvage facility (as 205 Auto Salvage) from circa 1972 until 2021. Operations associated with auto salvage include the draining, removal, and handling of used auto fluids and other hazardous waste (such as gasoline and diesel, mercury-containing switches, and used motor oil, anti-freeze, hydraulic fluids, and batteries). Under the best control measures, auto salvage operations frequently impact the surface soil in operational and vehicle storage areas with various

petroleum, metals, and other contaminants due to the accumulation of small-scale spills (including drips and drabs) over time, while larger releases create the potential for additional impacts to deeper soil and/or groundwater. General staining was observed within the interior of the maintenance and warehouse buildings and exterior surface areas.

There is no report of the use of underground storage tanks (USTs), subsurface auto lifts, or wastewater control systems, such as floor drains, oil/water separators, or clarifiers, on the subject property, and no record of a reported spills or releases (other than the ECSI case discussed below). However, the auto salvage operations were performed on the subject property for at least 20 years before the establishment of modern regulations regarding the handling of hazardous materials and waste and continued for at least forty after. Blackstone was provided with a limited subsurface investigation performed in 2020 that included the completion of a ground penetrating radar (GPR) and limited soil sampling on portions of the subject property. No evidence of USTs or other environmental concerns was reported during this investigation. Concentrations of arsenic, cadmium, chromium, and lead exceeding background levels and select screening levels were detected. The investigation did not cover the entire subject property (specifically excluded were areas surrounding the subject property buildings) and the results were not adequate to determine if impacts on the subject property are considered a threat to human health or the environment. As such, the long-term use of the subject property as a salvage yard is considered a REC.

As previously discussed, the subject property (205 Auto Salvage) is identified on several regulatory databases associated with an unresolved Environmental Cleanup Site Information (ECSI) case. The regulatory database listings and other documents provided indicate that stormwater from the subject property was determined to flow onto the west adjoining property, then to Johnson Lane farther west, which has been impacted by PCB-containing sediments and is being assessed and remediated as a part of the Columbia Slough Study Area. The ODEQ requested information from the subject property owner related to PCBs and metals in surface runoff. The subject property initially received an NFA from the ODEQ in 1997; however, in 2003, the status of the subject property was changed from NFA to “site evaluation” due to PCB-containing sediment identified at the west adjoining (downgradient) property (Meyers Containers). The ODEQ subsequently requested a stormwater source control evaluation (SCE) of the subject property in 2012. The SCE was not completed for the subject property. The subject property is identified with multiple violations and non-compliance notices related to stormwater runoff from 2017 through 2021. The auto salvage operations were reported to have ceased in June 2021.

Blackstone was provided a limited subsurface investigation performed on the subject property in 2020, which included limited sampling in the area of the on-site pond and the open area on the southwestern majority of the subject property, which did not identify elevated PCBs but did identify various metals above background and screening levels. Blackstone has not been provided any information related to the agency review of the investigation, nor any information indicating the resolution of the ECSI case. Based on the limited sampling performed and the open regulatory status, the ECSI case associated with the subject property is considered a REC.

The former operations on the subject property as an auto salvage facility necessitated that stormwater discharges be regulated under the NPDES 1200-Z Industrial Stormwater General Permit, which was initially required in 2001. This permit required stormwater monitoring, and, if applicable, implementation of corrective actions to maintain compliance. Prior reports indicate that the subject property received

several notices of noncompliance from the City of Portland Bureau of Environmental Service (BES) that included failure to collect and analyze samples (2017/2018 and 2018/2019 permit years), failure to meet inspection requirements, failure to meet monitoring requirements, record keeping violations, inadequate Stormwater Pollution Control Plan, and failure to submit Discharge Monitoring Reports. In addition, the ODEQ issued a notice of civil penalty on January 2, 2020, and a notice requiring 205 Auto Salvage to construct a Tier II stormwater impoundment by June 6, 2021. The stormwater impoundment was not developed, and 205 Auto Salvage reportedly ceased operations on June 30, 2021, and sent a notification of the termination of the 1200-Z Permit to BES in March 2022. In September 2022, the DEQ terminated the industrial and stormwater permits. The owner of the subject property is reportedly negotiating a settlement for all outstanding stormwater violations. The open violations associated with the former subject property operations are considered a *Business Environmental Risk Issue*.

According to the regulatory database reviewed, three UIC wells are registered for industrial stormwater drainage (UIC #11673) on the subject property. The UIC wells are located beneath a concrete lid observed in the northeast portion of the subject property, immediately south of the easternmost warehouse. Access to the UIC wells was not provided during the assessment. According to the Subject Property Representative, the wells assist with stormwater drainage from Northeast 105th Avenue (to the east) and are owned and maintained by the municipality. It is presumed that the wells are connected to the surface drainage inlet located in the parking lot on the eastern portion of the subject property, and receive surface drainage from the street and east adjoining properties. No additional information regarding the configuration or condition of the UIC wells has been identified. Based on the unknown configuration and condition of the UIC wells, and the potential for contaminants associated with surface runoff from the roadway and adjoining properties to have been released to the subsurface on the subject property, the on-site UIC wells are considered a REC.

The adjoining properties generally consisted of undeveloped, agricultural, and ponded land with areas of residential development from at least 1935. The present-day north adjoining multi-tenant business park was constructed in the 1980s. The east adjoining were developed across NE 105th Avenue were developed with the present-day commercial/light industrial properties in the 1970s and 1990s. The south and west adjoining properties were developed with the present-day industrial buildings circa 1975.

Recycling operations (including metal recycling) have been identified at the west-southwest adjoining property since the 1970s, and the south adjoining property since the early 2000s. Regulatory listings associated with the west-southwest adjoining property identified hazardous waste generation and management (before the establishment of modern regulations), and ODEQ involvement recommending further investigation. Blackstone encountered no evidence of comprehensive environmental investigations into historical adjoining property uses from ODEQ online resources; therefore, based on the inferred groundwater flow direction to the north-northeast toward the Columbia River and the close proximity to the subject property, the use of the south and west-southwest adjoining properties as recycling facilities are considered a REC and a vapor encroachment concern (VEC).

The historical agricultural use of the subject property and adjoining properties may have involved the use of pesticides and/or herbicides. A review of aerial photographs and topographic maps revealed no evidence of significant historical pesticide storage buildings at the subject property and adjoining properties. In addition, no spills or releases of hazardous materials have been identified in association



with agricultural activities within the study area during the course of this assessment. Therefore, the historical agricultural use of the subject property and adjoining properties is not considered a REC.

No other significant use, treatment, storage, disposal, or generation of hazardous or petroleum products associated with the historical subject property and adjoining use was identified as a result of the review of the historical information.

No other RECs were identified as a result of the review of the historical information.

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7 ENVIRONMENTAL DATABASE SEARCH AND REVIEW

EDR provided Blackstone with a search report of federal, state, local, tribal, and proprietary environmental databases to determine the environmental regulatory status of the subject property, adjoining facilities, and facilities identified within the specified approximate minimum search distance (AMSD) of the subject property. ASTM Standard E1527-21, Section 8.2.1 establishes the distance from the subject property that each database is searched. *Standard federal, state, and tribal databases* searched, and the search distances specified for each database are summarized as follows:

STANDARD ENVIRONMENTAL RECORD SOURCES

Federal Databases	Search Distance
NPL: National Priority List (Superfund) Sites	1.0 mile
Proposed NPL: Proposed National Priority List Sites	1.0 mile
Delisted NPL: National Priority List Deletions	0.5 mile
CERCLA No Further Remedial Action Planned (NFRAP) Sites	0.5 mile
NPL Liens: Federal Superfund Liens	Subject Property only
FEDERAL FACILITY: Federal Facility Site Information Listing	1.0 mile
SEMS: Superfund Enterprise Management System	0.5 mile
SEMS-ARCHIVE: Superfund Enterprise Management System Archive	0.5 mile
RCRA CORRACTS: Resource Conservation and Recovery Act - Corrective Action Sites	1.0 mile
RCRA TSDf: RCRA – Treatment, Storage and Disposal Facilities	0.5 mile
RCRA LQGs: RCRA - Large-Quantity Generators	Subject Property and adjoining
RCRA SQGs: RCRA - Small-Quantity Generators	Subject Property and adjoining
RCRA CESQG: RCRA – Conditionally Exempt Small-Quantity Generators	Subject Property and adjoining
US ENG CONTROLS: Engineering Controls Sites List	Subject Property only
US INST CONTROL: Sites with Institutional Controls	Subject Property only
ERNS: Emergency Response Notification System	Subject Property only
State and Tribal Databases	
SHWS: State Hazardous Waste Site/State "Superfund" Equivalent Sites	1.0 mile
SWF/LF: Solid Waste Facilities & Landfill Sites	0.5 mile
LUST: Leaking Underground Storage Tanks	0.5 mile
LAST: Leaking Aboveground Storage Tanks	0.5 mile
INDIAN LUST: Leaking Underground Storage Tanks on Indian Lands	0.5 mile
UST: Registered Underground Storage Tanks	Subject Property and adjoining
AST: Registered Aboveground Storage Tanks	Subject Property and adjoining
INDIAN UST: Registered Underground Storage Tanks on Indian Lands	Subject Property and adjoining
INST CONTROL: Sites with Institutional Controls	Subject Property only
ENG CONTROLS: Sites with Engineering Controls	Subject Property only
VCP: Voluntary Cleanup Program Sites	0.5 mile
INDIAN VCP: Voluntary Cleanup Priority sites on Indian Lands	0.5 mile
BROWNFIELDS: Brownfields Listings	0.5 mile

All federal, state, local, tribal, and proprietary databases searched, the search distances specified for each database, and the results of the environmental database search are provided in the complete database report (*EDR Radius Map*), which is included in the appendices. The database search report also includes the date and a detailed description of each database searched, which include, but are not limited to, the *standard environmental records sources*, as defined in ASTM Standard E1527-21.

7.1 FEDERAL, STATE, LOCAL, TRIBAL, AND PROPRIETARY DATABASES

A review of the databases included in the *EDR Radius Map* has been performed. Please refer to the *EDR Radius Map*, included in the appendices, for a complete list of the properties included on the databases within the required AMSD. The summary below includes database listings, if present, associated with the subject property and adjoining properties, as well as any additional property/listing within the AMSD that is deemed by the *environmental professional* to be at a distance or status that presents a higher potential risk for environmental concerns to the subject property and requires discussion:

SUBJECT PROPERTY

205 Auto Salvage, Inc. (5605 NE 105th Ave) is listed in the ECSI, VCP, NPDES, UIC, FINDS, ECHO, and OR RGA HWS databases. The ECSI database (Site ID #2087) information indicates the subject property was operating as an auto wrecking yard before 1973 and practices before 1973 are unknown. The subject property was included within several sites in the area to be screened as part of an effort to identify sources of PCB contamination at nearby Johnson Lake. It was reported that stormwater from the subject property flows to ponds on the west adjoining Container Management Services property (ECSI#2062), which ultimately flows to Johnson Lake. A screening site visit was performed at the subject property in 1995 and the subject property was formerly issued a No Further Action (NFA) determination in 1997 (a copy of this NFA letter was not available). However, the DEQ changed the remedial action status from NFA to “site evaluation” in 2003 (effectively withdrawing the NFA designation), due to additional information gathered during a cleanup investigation at the west adjoining Container Management Services property. In March 2012, the DEQ requested the subject property owner perform a stormwater source control evaluation for PCBs and metals and recommended a remedial investigation. No information regarding previous environmental investigations completed at the subject property was available from the DEQ online databases.

The subject property is also listed on the VCS database with a status of “VCS Waiting List” from 2012 with regards to the aforementioned ECSI listing. The subject property is listed on the UIC and NPDES databases for the issuance of stormwater permits associated with industrial stormwater discharge. The database indicates three UIC structures are located on the subject property with a status listed as “Registered and not RA.”

As discussed in Section 6.8, the long-term use of the subject property as a salvage yard, UIC wells, and the unresolved DEQ case are considered RECs.

The FINDS and ECHO database listings reference the ECSI and NPDES listings. The OR RGA HWS database identifies the subject property between 1998 and 2012. Based on the nature of these listings, no RECs were identified.

ADJOINING OR FACILITIES IN CLOSE PROXIMITY

The Columbia Slough (Portland Rd) is located approximately 250 feet north of the subject property in a downgradient direction based on inferred groundwater flow and is listed in the SEMS-Archive database. The Columbia Slough (Slough) is located south and parallel to the Columbia River and consists of approximately 31 miles of waterway extending from Fairview Lake on the east side to the Willamette River on the west. Industrial and urban development

along the Slough has resulted in the accumulation of a variety of contaminants in Slough sediments and fish tissue collected from the Slough. Some contaminants, including PCBs and pesticides bioaccumulate in fish to the extent that resident fish in the Slough are harmful to eat. In 2005, the DEQ issued a Record of Decision (ROD) establishing a program to cleanup sediments at individual release sites, implement source control measures throughout the watershed to prevent further releases, and monitor conditions over the long term to ensure continued improvement. Sediment investigation and cleanup work being completed by ODEQ is currently ongoing. As discussed throughout this report, stormwater from the subject property flows to the west adjoining property. PCB contamination at Johnson Lake (the discharge point for on-site stormwater, which is part of the Slough) was attributed to historic container management operations at the west adjoining facility. No documentation was available to indicate that the current/former subject property operations have contributed to the current Slough contamination or pose a risk of causing future contamination. As such, this listing is not considered a REC.

10th Marx Pump Station (5536 NE 105th Avenue) is located adjoining east in a cross-gradient direction based on inferred groundwater flow. This property is listed on the UST and LUST databases. Based on information in the regulatory database, the property is listed with one decommissioned UST and LUST ID 26-01-0036 that occurred on July 11, 2001, with closure issued on September 26, 2001. According to the DEQ online LUST database, diesel was found in on-site soil. The property was issued an NFA determination with no further investigation required. Based on regulatory status, including the removal of the UST and Closed LUST Case, this property is not considered a REC.

Gordy's Car Shoppe/Vacant/Steve's Auto Restorations (5701-5705 NE 105th Ave) is located adjoining north in a down-gradient direction based on inferred groundwater flow. This property is listed in the RCRA NonGen/NLR database for generating regulated hazardous wastes. The property is listed in the EDR Hist Auto database as an automotive repair shop between 1985 and 1995. In addition, the property is listed in the UST database for one decommissioned tank. This address was not identified on any regulatory databases indicative of a release or spill. No violations or enforcement actions were noted in the database report or online databases. Based on the status of the facility, absence of a reported release or spill, and down-gradient direction from the subject property, this property is not considered a REC.

Allied Waste of Portland/Republic Services of Portland (10239 NE Marx St) is located adjoining west-southwest in an up-gradient direction based on inferred groundwater flow. This facility is listed on the SWF/LF database as an operating recycling facility. According to the ECSI and VCP databases, this facility was added to the ECSI Database in 2012 due to concerns of stormwater runoff draining to Johnson Lake. A stormwater source control evaluation was recommended, but no other actions were taken. The facility is listed on the AST database for an inactive AST with no associated release incidents reported. The facility is listed in the Hazmat database for an incident in 2007 involving an acid and polypropylene reaction (not affecting soil or groundwater). The incident was turned over to the responsible party. The facility is listed on the UIC and NPDES databases for the issuance of stormwater drainage permits. The HSIS database listing is related to chemical storage at the facility. No information regarding previous environmental investigations completed at this facility was available from ODEQ online databases. Based on the past and current use of this property as a recycling facility since the 1970s, the absence of any comprehensive environmental investigations conducted at the facility, and the close proximity/upgradient direction to the subject property, these database listings are considered a REC.

Kings Roofing Company (10319 NE Marx) is located adjoining south in an up-gradient direction based on inferred groundwater flow. This facility is listed on the AST database for propane ASTs and is listed on the HSIS database related to the propane storage at the facility. This address was not identified on any regulatory databases indicative of a release or spill. No violations or enforcement actions were noted in the database report or online databases. Based on the status of the facility and the absence of a reported release or spill, this property is not considered a REC.

Container Management Services (10103 NE Marx Street) is located adjoining west in a cross-gradient direction based on inferred groundwater flow and is listed in various databases including the ECSI, VCP, HSIS, Manifest, NPDES, UIC, RCRA-VSQG, UST, and LUST databases. According to ODEQ records, the facility is identified as the Former Myers Container Site (ECSI Site ID #2062) in association with the investigation and cleanup actions focused on polychlorinated biphenyl (PCB)-contaminated soil in stormwater. According to ODEQ records, this facility was previously owned by various entities and operated as a drum reconditioning and intermediate bulk container processing facility since 1977. In the late-1990s/early-2000s, the facility was evaluated due to elevated levels of PCBs found in sediment in the nearby Johnson Lake, which is the discharge point for the two stormwater runoff ponds located on the facility. The source of the PCBs was attributed to historic container management operations at the facility. Source control measures were conducted at the facility in 2003, and later in 2012-2013, which adequately addressed PCB contamination along the stormwater migration pathway and residual PCB contamination identified in the facility shallow soil. A No Further Action (NFA) determination was issued by ODEQ for the facility on September 17, 2014. In addition, the facility is listed on the UST/LUST databases for two former USTs that were removed in 1997. It was reported that diesel-range petroleum hydrocarbon contamination was discovered during the UST decommissioning, however, the contamination was below the applicable cleanup level and an NFA determination was issued for the USTs on September 26, 2000. In addition, the facility is listed in the RCRA-VSQG, RGA HWS, Manifest, FINDS, ECHO, and Haznet databases for the generation of hazardous wastes. According to the RCRA-VSQG database, the property generated ignitable/corrosive wastes, chromium, lead, and solvents. The ECHO database identified the property as a “significant noncomplier” between 2020 and 2022, with informal enforcement actions issued. Based on the cleanup actions conducted, issuance of NFA determinations by the ODEQ, and distance from the main operations building at the facility (over 200 feet from the subject property), these database listings are not considered a REC.

NON-ADJOINING FACILITIES WITHIN APPROXIMATE MINIMUM SEARCH DISTANCE

As detailed in the EDR Report, several other facilities on various databases are within the ASTM E1527-21 Approximate Minimum Search Distance (AMSD). Based on factors such as distance to the subject property, topography, media affected (surface water, soil, soil vapor, groundwater, or air), depth to groundwater, anticipated and reported groundwater flow direction away from the subject property, hydrological separation, and/or a “Closed Out” and/or “No Further Action (NFA)” regulatory status, these non-adjoining facilities within the AMSD are unlikely to have current or former releases of hazardous substances and/or petroleum products that could migrate to the subject property and are not considered RECs.

7.2 UNMAPPABLE FACILITIES

Due to inadequate address information or other erroneous facility information, EDR may not be able to plot certain facilities listed in the environmental databases on the radius map but includes the facilities in the EDR Report’s unmappable facility summary. Blackstone reviewed this summary to determine if any of the listed facilities include or adjoin the subject property. The unmappable facility listings are summarized as follows:

SUBJECT PROPERTY

Not listed

ADJOINING FACILITIES

The Columbia Slough is discussed in Section 7.1.

7.3 VAPOR ENCROACHMENT SCREENING

Blackstone performed a Tier 1 Vapor Encroachment Screening in accordance with ASTM E 2600-15, *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*. The objective of Tier 1 screening is to determine if a Vapor Encroachment Condition (VEC) exists in connection with the subject property. Tier 1 screening is a non-numeric evaluation that considers available information for the subject property and nearby properties from historical sources, government records, and other resources that are practically reviewable and typically reviewed as part of a Phase I ESA. Based on the findings of the Phase I ESA, historical industrial use of the subject property and adjoining properties, and the application of the Tier 1 screening criteria, a VEC has been identified at the subject property.

7.4 AFFIRMATION

The conclusions Blackstone draws from the EDR report are limited to the accuracy of that report. To the extent possible, Blackstone used field observations to verify the information or identify errors and inconsistencies in the search report regarding the listed facilities in the immediate vicinity of the subject property. The database reviewed is sufficiently complete and current to be used as a source to satisfy the regulatory database requirements outlined in ASTM Standard E1527-21.

7.5 ENVIRONMENTAL DATABASE SEARCH AND REVIEW CONCLUSIONS

The subject property is listed on the ECSI databases for an unresolved DEQ case. As previously discussed, the long-term use of the subject property as a salvage yard (approximately 60 years), the presence of the UIC wells, and the unresolved ECSI case are considered RECs. In addition, based on the use of the west-southwest adjoining property as a recycling facility since the 1970s, and the absence of any comprehensive environmental investigations conducted at the facility, Allied Waste of Portland/Republic Services of Portland is considered a REC and VEC.

The above-mentioned RECs are discussed in greater detail in Section 6.8.



8 SUBJECT PROPERTY INSPECTION

Name of Inspector: Brandy Groves
Date of Inspection: December 19, 2022

SUBJECT PROPERTY REPRESENTATIVE

<i>Name</i>	<i>Title or Association with Subject Property</i>	<i>Years Associated with Subject Property</i>
Garry Gossett	President of 205 Real Estate Inc	~49
Kenny Houser	Senior Associate Broker with Capacity Commercial Group	Not applicable

The subject property inspection consisted of a walkover of the subject property perimeter and exterior subject property areas, and a walk-through of the common areas, storage areas, warehouse areas, and grounds. Blackstone walked through the building interiors at the direction of the Subject Property Representative. Not all common spaces, storage areas, or warehouse areas were observed. Furthermore, during the subject property inspection, Blackstone did not inspect inaccessible areas of the subject property including beneath parked motor vehicles, under manholes, or within locked utility vaults. The adjoining properties were visually observed from curbside without being entered. Blackstone has no reason to believe the inability to inspect these areas would alter the findings or recommendations set forth in this report or be considered a significant data gap.

8.1 UNDERGROUND STORAGE TANKS (USTs)

<i>Number of USTs</i>	<i>Capacity (gallons)</i>	<i>Contents</i>	<i>Location</i>	<i>Status/Notes</i>	<i>REC</i>
None					No

Blackstone identified no physical evidence of current or former USTs during the subject property inspection. The Subject Property Representative was unaware of current or former USTs.

8.2 ABOVEGROUND STORAGE TANKS (ASTs)

<i>Number of ASTs</i>	<i>Capacity (gallons)</i>	<i>Contents</i>	<i>Location</i>	<i>Status/Notes</i>	<i>REC</i>
One	~100	Unleaded gas	Warehouse (westernmost)	See discussion below	No
Two	~250	Used oil	Warehouse (westernmost)	See discussion below	

The subject property contains one, approximate 100-gallon portable (on wheels) AST for unleaded gasoline and two, approximate 250-gallon double-walled steel construction ASTs for used oil within the

westernmost warehouse. The ASTs are located atop the concrete slab. The Subject Property Representative reported that the used oil tanks were recently emptied by Northwest Oil (contracted waste hauler) and that the unleaded gas is utilized for the owner’s personal vehicles. The ASTs were observed to be in good condition during the subject property inspection with no signs of leaks or spills beneath the tanks. Based on the size/usage of the ASTs, registration is not required with the ODEQ. No releases pertaining to the ASTs were identified based on a review of regulatory databases. Considering the current regulatory status and absence of observed or reported releases, the presence of the ASTs at the subject property is not considered a REC.

8.3 HAZARDOUS SUBSTANCES AND PETROLEUM PRODUCTS

The following section describes chemical and petroleum storage at the subject property (i.e., drums, totes, and intermediate bulk containers). This section includes the chemical and petroleum storage containers observed (both in connection with the subject property use and not in connection with the subject property use (if observed)). Where applicable, all bulk fixed chemical and petroleum product storage (such as USTs and/or ASTs) is discussed in Sections 8.1 and 8.2.

<i>Chemical or Material</i>	<i>Use</i>	<i>Container Type</i>	<i>Location</i>	<i>REC</i>
Cleaning supplies	General housekeeping	1-gallon or smaller	Office and warehouses	No
Maintenance materials (lubricants, paint, degreasers, caulk, adhesives, etc.)	General maintenance	5-gallons or smaller	Office, warehouses, and storage areas	No
Hydraulic oil	Former tenant operations, current tenant storage	55 gallons or smaller in original packaging	Warehouses and storage yard	No
Lead acid batteries	Former tenant operations	N/A	Warehouses	No
Automobile transmissions and engine parts	Former tenant operations, current tenant storage	N/A	Warehouses and storage yard	No
Used tires	Former tenant operations, current tenant storage	N/A	Warehouses and storage yard	No
Propane	Former tenant operations	10-gallons or smaller	Warehouses	No

The majority of the chemicals and/or materials were observed appropriately stored and no evidence of surface staining, spills, or releases was apparent at the subject property. The containers were undamaged and capped, and the immediate storage areas did not exhibit evidence of spills or leaks. No unidentified substance containers of potential concern were observed. In addition, no floor drains were observed in the immediate vicinity of the chemical storage areas. According to the Subject Property Representative, no releases of chemicals or materials requiring an emergency response and/or agency notification have

occurred at the subject property.

Blackstone observed used tires, engine parts, a 55-gallon drum (labeled as Mercedes Benz Genuine Engine Oil that appeared to be empty), and numerous 5-gallon buckets of hydraulic oil on the ground surface throughout the subject property storage yard. Considering Blackstone observed no physical evidence of surface staining, spills, or releases in these storage areas, the tires, engine parts, drum, and buckets are not considered a REC; however, as a *Business Environmental Risk Issue*, Blackstone recommends properly storing (i.e., off the ground surface) and/or disposing of the components in accordance with applicable regulations.

Blackstone identified no additional significant use, treatment, storage, or generation of hazardous or petroleum products.

8.4 HAZARDOUS SUBSTANCES AND PETROLEUM PRODUCTS WASTES

<i>Hazardous Waste</i>	<i>Generated By</i>	<i>Storage Container</i>	<i>Storage Location</i>	<i>Disposal Details</i>	<i>REC</i>
Used, mixed hydraulic oil	Former tenant operations	55-gallon drum	Warehouse (westernmost)	See discussion below	No
Waste oil rags	Former tenant operations	5-gallon bucket	Warehouse (westernmost)	See discussion below	No

As noted above, the observed hazardous wastes are stored within designated buckets/drums. No evidence of surface staining, spills, or releases was apparent on the subject property and the bucket and drum are stored on the concrete slab. According to the Subject Property Representative, the hazardous wastes are disposed of at the Oil Re-Refining facility (waste disposal company that collects used oil, etc.). As such, the chemicals and/or materials stored onsite are not considered a REC.

Blackstone identified no other physical evidence of on-site hazardous waste generation, storage, or disposal during the subject property inspection. The Subject Property Representative was unaware of any other on-site hazardous waste generation, storage, or disposal.

8.5 NON-HAZARDOUS WASTES

<i>Non-Hazardous Waste</i>	<i>Generated By</i>	<i>Storage Container</i>	<i>Storage Location</i>	<i>Disposal Details</i>	<i>REC</i>
General refuse	Staff and residents	Trash bins	Throughout	Offsite disposal by Waste Management	No

Blackstone identified no physical evidence of on-site non-hazardous waste disposal during the subject property inspection. The Subject Property Representative was unaware of any on-site non-hazardous waste disposal.

8.6 POLYCHLORINATED BIPHENYLS (PCBs)

PCBs can be present in coolants or lubricating oils used in older electrical transformers, hydraulic systems, and other similar equipment. The 1976 Toxic Substances Control Act (TSCA) extended regulatory control over the use of PCBs to the United States Environmental Protection Agency (USEPA). In November 1979, the USEPA generally prohibited the domestic manufacture of PCBs in electromagnets, transformers, and heat-transfer and hydraulic equipment. Blackstone identified the following possible PCB-containing equipment at the subject property:

<i>Equipment</i>	<i>Location</i>	<i>Owner</i>	<i>Status/Notes</i>	<i>REC</i>
Light ballasts/small capacitor equipment	Office and warehouses	Subject Property	See discussion below	No

Fluorescent light ballasts and other miscellaneous small capacitor equipment may be present in the subject property buildings. Based on the date of construction of the subject property buildings (circa 1960 to 1980s), fluorescent light ballasts and other miscellaneous small capacitor equipment may contain PCBs. Prior to renovation or demolition, Blackstone recommends that all PCB-containing equipment be identified, and properly removed and disposed of from the subject property buildings in accordance with applicable federal, state, and local regulations.

The subject property is serviced by off-site pole-mounted transformers that are owned and maintained by Portland General Electric.

8.7 WASTEWATER DISCHARGES

<i>Type</i>	<i>Generated By</i>	<i>Discharged To</i>	<i>Status/Notes</i>	<i>REC</i>
Sanitary	Staff and tenants	Municipal sewer	None	No

Blackstone identified no physical evidence of septic systems, cesspools, clarifiers, or oil/water separators during the subject property inspection. The Subject Property Representative was unaware of such features on the subject property. Standard sanitary drains are present in the public restrooms.

8.8 STORMWATER DISCHARGES

<i>Discharged From</i>	<i>Discharged To</i>	<i>Status/Notes</i>	<i>REC</i>
Roofs via internal drains and surface discharge	Surface gradient and subsurface municipal stormwater collection system	None	No
Exterior subject property surfaces	Surface gradient to retention/bioswale area, UIC wells, and adjoining public right of ways	None	No

One stormwater retention/bio-swale area is located along the western perimeter of the subject property. The area is equipped with a storm drain for presumed discharge to nearby Johnson Lake. Surface runoff from the storage yard discharges to this retention/bio-swale area. No sheens, odors, or other evidence of impacts were noted in the retention area. The Subject Property Representative was unaware of any current stormwater issues at the subject property. As previously discussed, the subject property has previously been identified with violations and non-compliance orders related to stormwater control and runoff. These violations are considered a *Business Environmental Risk Issue*. The open ECSI case for the subject property is considered a REC.

Blackstone identified no other on-site stormwater retention ponds during the subject property inspection. The Subject Property Representative was unaware of other such features on the subject property.

8.9 PITS, PONDS, AND LAGOONS (ON-SITE PROCESS WATER DISCHARGE)

<i>Type</i>	<i>Contents</i>	<i>Location</i>	<i>Status/Notes</i>	<i>REC</i>
None				No

Blackstone identified no pits, ponds, or lagoons used for process water discharge during the subject property inspection. The Subject Property Representative was unaware of other such features on the subject property.

8.10 WELLS

<i>Type</i>	<i>Location</i>	<i>Status/Notes</i>	<i>REC</i>
Underground Injection Control (UIC) wells	Northeast part of subject property; south of the easternmost warehouse	See discussion below	Yes

According to the regulatory database reviewed for this assessment, there are three UIC wells for industrial stormwater drainage (UIC #11673). The UIC wells are located beneath a concrete lid, in the northeast part of the subject property, immediately south of the easternmost warehouse. Access to the UIC wells was not provided during the assessment. According to the Subject Property Representative, the wells assist with stormwater drainage from Northeast 105th Avenue and are owned and maintained by the municipality. As previously discussed, based on the unknown configuration and condition of the UIC wells, and the potential for contaminants associated with surface runoff from the roadway and adjoining properties to have been released to the subsurface on the subject property, the on-site UIC wells are considered a REC.

Blackstone identified no physical evidence of groundwater monitoring wells, dry wells, extraction wells, vapor wells, groundwater production wells, abandoned wells, or other wells during the subject property inspection. The Subject Property Representative was unaware of additional on-site wells.



8.11 UNDERGROUND PRODUCT PIPELINES

<i>Type</i>	<i>Location</i>	<i>Status/Notes</i>	<i>REC</i>
None			No

Blackstone identified no physical evidence of underground product pipelines carrying petroleum or other hazardous substances during the subject property inspection. The Subject Property Representative was unaware of on-site product pipelines.

8.12 STRONG, PUNGENT, OR NOXIOUS ODORS

<i>Odors</i>	<i>Location</i>	<i>Status/Notes</i>	<i>REC</i>
None			No

Blackstone identified no strong, pungent, or noxious odors indicative of environmental concerns during the subject property inspection. The Subject Property Representative was unaware of such odors at the subject property.

8.13 POOLS OF LIQUID

<i>Pools of Liquid</i>	<i>Location</i>	<i>Status/Notes</i>	<i>REC</i>
None			No

Blackstone identified no pools or sumps containing liquids indicative of environmental concerns during the subject property inspection. The Subject Property Representative was unaware of pools or sumps containing liquids at the subject property.

8.14 STRESSED VEGETATION OR STAINED SURFACES

<i>Stressed Vegetation or Stained Surfaces</i>	<i>Location</i>	<i>Status/Notes</i>	<i>REC</i>
General			No

General staining was observed within the interior of the maintenance and warehouse buildings and exterior surface areas.

8.15 STAINS OR CORROSION ON FLOORS, WALLS, OR CEILINGS

<i>Stains or corrosion on floors, walls, or ceilings</i>	<i>Location</i>	<i>Status/Notes</i>	<i>REC</i>
None			No



Blackstone identified no stains or corrosion on floors, walls, or ceilings during the subject property inspection. The Subject Property Representative was unaware of stains or corrosion on floors, walls, or ceilings.

8.16 SUBJECT PROPERTY INSPECTION CONCLUSIONS

Blackstone identified no specific evidence of RECs in connection with the subject property as a result of the subject property inspection. However, the long-term use of the subject property as a salvage yard is considered a REC.

DRAFT

9 ASTM NON-SCOPE CONSIDERATIONS

Blackstone performed the following client-specific activities to identify *ASTM Non-Scope Considerations (Business Environmental Risk Issues)* in addition to the ASTM requirements and as required per the Agreement.

9.1 ASBESTOS-CONTAINING MATERIALS (ACM)

Frequently encountered types of ACM used in building construction include floor tile and mastic, spray-applied fireproofing, acoustical/decorative ceiling plaster, wallboard and joint compound, insulation, and many other building materials in common use prior to 1981. Materials that contain greater than one percent asbestos fibers are considered regulated ACM and must be handled according to USEPA and Occupational Safety and Health Administration (OSHA) regulations.

Blackstone conducted a limited visual survey for the presence of typically suspect ACM at the subject property. Materials that are typically considered suspect ACM were identified at the subject property and included drywall systems (drywall, joint compound and texture), vinyl flooring and mastic, acoustic ceiling tiles, and roofing materials. The suspect materials were observed in generally good condition and assessed as friable (ceiling tiles) and non-friable materials. Hidden materials such as those inside walls, inaccessible attics, crawl spaces, and inside ductwork were not evaluated. In accordance with the scope of work, no sampling was conducted.

OSHA regulations require property owners to identify presumed ACM (PACM) in properties constructed prior to 1981. The regulations include training, notification, and labeling requirements in operational areas. Based on the construction date of the subject property buildings (circa 1960 to 1980s), these regulations apply.

Based on the construction date of the subject property buildings (circa 1960 to 1980s) and the limited nature of Blackstone's visual survey, Blackstone recommends preparing and implementing a subject property-specific Asbestos Operations and Maintenance (O&M) Program. In addition, Blackstone recommends compliance with OSHA regulations requiring the identification of presumed ACM as well as training, notification, and labeling requirements in operational areas.

This scope of service should not be construed as a comprehensive asbestos survey for pre-demolition or pre-renovation purposes. Therefore, regardless of the construction date, prior to renovation or demolition activities at the subject property, the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) may require that regulated ACM be identified (through sampling or building records) and handled in accordance with applicable local, state, and federal regulations.

9.2 LEAD-BASED PAINT (LBP)

Based on the original date of construction of the subject property buildings (circa 1960 to 1980s), there is a potential for the presence of LBP at the subject property. Sampling of painted surfaces was not conducted by Blackstone as part of the scope of this assessment. Significant areas of cracking and/or peeling paint were not observed. Considering the subject property is utilized as a commercial storage yard, no further evaluation of LBP is recommended at this time. However, lead-based paint should be handled in accordance with local, state, and federal regulations.

9.3 RADON GAS

A review of records regarding radon concentrations in Multnomah County, Oregon, was conducted to determine if concentrations of radon in the general area of the subject property are within the USEPA guidelines. The USEPA uses a continuous exposure level of 4.0 picoCuries per liter (pCi/L) of air or greater as a guidance level at which further evaluation and potential remedial actions are recommended.

According to the USEPA Office of Radiation and Indoor Air information/mapping, the subject property is located within Radon Zone Level 2. This zone has a predicted average indoor radon gas screening level from 2.0 pCi/L to 4.0 pCi/L, which is below USEPA guidance levels. In accordance with the scope of work, a radon screening was not conducted as part of this assessment. Based on the non-residential use of the subject property and the subject property's location within Radon Zone Level 2, no further evaluation is recommended at this time.

9.4 APPARENT MOLD GROWTH (AMG)

As part of this subject property assessment, Blackstone performed the following tasks:

- Looked for evidence of AMG in the areas surveyed during the subject property assessment;
- Made inquiries of property management regarding past and current leaks or known mold issues;
- Made inquiries of property management about whether there have been tenant complaints regarding health problems, musty odors, or water leaks;
- Observed areas where significant leaks were reported; and
- Conducted a representative visual/olfactory survey for evidence of current or past water leakage and/or mold.

Blackstone observed no AMG within the office or warehouse areas accessed. The Subject Property Representative was not aware of AMG issues at the subject property. As such, no further evaluation is recommended.

The limited AMG visual survey provides an indication of the potential for significant environmental issues associated with AMG. Blackstone did not inspect inaccessible areas such as behind walls, in crawl spaces, and inside ductwork. As such, the limited AMG visual survey should not be regarded as a comprehensive survey.



9.5 DRINKING WATER QUALITY

The City of Portland Water Bureau provides drinking water to the subject property. The *2022 Drinking Water Quality Report* (the most recent report available for review) indicates the municipal water system meets the requirements as established by the USEPA, state, and local authorities for drinking water quality, including lead content. As such, no further investigation of drinking water quality is recommended.

9.6 AIR EMISSIONS

<i>Regulated Emissions Source</i>	<i>Discharged To</i>	<i>Potential Impacts</i>	<i>Status/Notes</i>	<i>REC</i>
None				No

At the time of the subject property inspection, no permitted discharges to air were identified for the subject property. The Subject Property Representative was not aware of air emissions requiring a permit.

9.7 WETLANDS

As defined by the USEPA and U.S. Army Corps of Engineers (USACE), wetlands are "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions."

Wetlands possess three essential characteristics: (1) hydrophytic vegetation; (2) hydric soils; and (3) hydrology. All three characteristics must be prevalent to document an area as a jurisdictional wetland. The following summarizes information Blackstone obtained regarding the potential presence of wetlands at the subject property:

<i>Information Source</i>	<i>Findings</i>
National Wetlands Inventory (NWI) online Wetland Mapper at https://www.fws.gov/wetlands/data/Mapper.html	No mapped federal wetlands are located at the subject property.
Field observations	Vegetation and a ponded area associated with stormwater management that is characteristic of possible wetlands were observed at the western portion of the subject property. Future development at the subject property should be conducted in accordance with local, state, and federal wetland regulations.

10 CONCLUSIONS AND RECOMMENDATIONS

Blackstone performed a Phase I ESA of the subject property in conformance with the scope and limitations of ASTM Standard Practice E1527-21, the regulations at 40 CFR Part 312, and the December 5, 2022, proposal (Agreement) between Crest Partners and Blackstone. Any exceptions to, or deletions from, this practice are described in Sections 1.2 through 1.4 of this report. This assessment has revealed the following *recognized environmental conditions (RECs)*, *historical recognized environmental conditions (HRECs)*, *controlled recognized environmental conditions (CRECs)*, and/or *significant data gaps* in connection with the subject property:

- **Open Regulatory Case:** The subject property (205 Auto Salvage) is identified on several regulatory databases associated with an unresolved Environmental Cleanup Site Information (ESCI) case. The regulatory database listings and other documents provided indicate that stormwater from the subject property was determined to flow onto the west adjoining property, then to Johnson Lane farther west, which has been impacted by PCB-containing sediments and is being assessed and remediated as a part of the Columbia Slough Study Area. The Oregon Department of Environmental Quality (ODEQ) requested information from the subject property owner related to polychlorinated biphenyls (PCBs) and metals in surface runoff. The subject property initially received a No Further Action (NFA) from the ODEQ in 1997; however, in 2003, the status of the subject property was changed from NFA to “site evaluation” due to PCB-containing sediment identified at the west adjoining (downgradient) property (Meyers Containers). The ODEQ subsequently requested a stormwater source control evaluation (SCE) of the subject property in 2012. The SCE was not completed for the subject property. The subject property is identified with multiple violations and non-compliance notices related to stormwater runoff from 2017 through 2021 (further discussed below). The auto salvage operations were reported to have ceased in June 2021.

Blackstone was provided a limited subsurface investigation performed on the subject property in 2020, which included limited sampling in the area of the on-site pond and the open area on the southwestern majority of the subject property, which did not identify elevated PCBs but did identify various metals above background and screening levels. Blackstone has not been provided any information related to the agency review of the investigation, nor any information indicating the resolution of the ESCI case. Based on the limited sampling performed and the open regulatory status, the ESCI case associated with the subject property is considered a REC.

- **Long-Term Auto Salvage Use of Subject Property:** Portions of the subject property have been used as an auto storage and/or salvage yard since at least 1960, and the entire subject property was occupied as an auto salvage facility (as 205 Auto Salvage) from circa 1972 until 2021. Operations associated with auto salvage include the draining, removal, and handling of used auto fluids and other hazardous waste (such as gasoline and diesel, mercury-containing switches, and used motor oil, anti-freeze, hydraulic fluids, and batteries). Under the best control measures, auto salvage operations frequently impact the surface soil in operational and vehicle storage areas with various petroleum, metals, and other contaminants due to the accumulation of small-scale spills (including drips and drabs) over time, while larger releases create the potential for additional impacts to deeper soil and/or groundwater. General staining was observed within the interior of the

maintenance and warehouse buildings and exterior surface areas.

There is no report of the use of underground storage tanks (USTs), subsurface auto lifts, or wastewater control systems, such as floor drains, oil/water separators, or clarifiers, on the subject property, and no record of reported spills or releases (other than the ECSI case discussed above). However, the auto salvage operations were performed on the subject property for at least 20 years before the establishment of modern regulations regarding the handling of hazardous materials and waste and continued for at least 40 years after. Blackstone was provided with a limited subsurface investigation performed in 2020 that included the completion of a ground penetrating radar (GPR) and limited soil sampling on portions of the subject property. No evidence of USTs or other environmental concerns was reported during this investigation. Concentrations of arsenic, cadmium, chromium, and lead exceeding background levels and select screening levels were detected. The investigation did not cover the entire subject property (specifically excluded were areas surrounding the subject property buildings) and the results were not adequate to determine if impacts on the subject property are considered a threat to human health or the environment. As such, the long-term use of the subject property as a salvage yard is considered a REC.

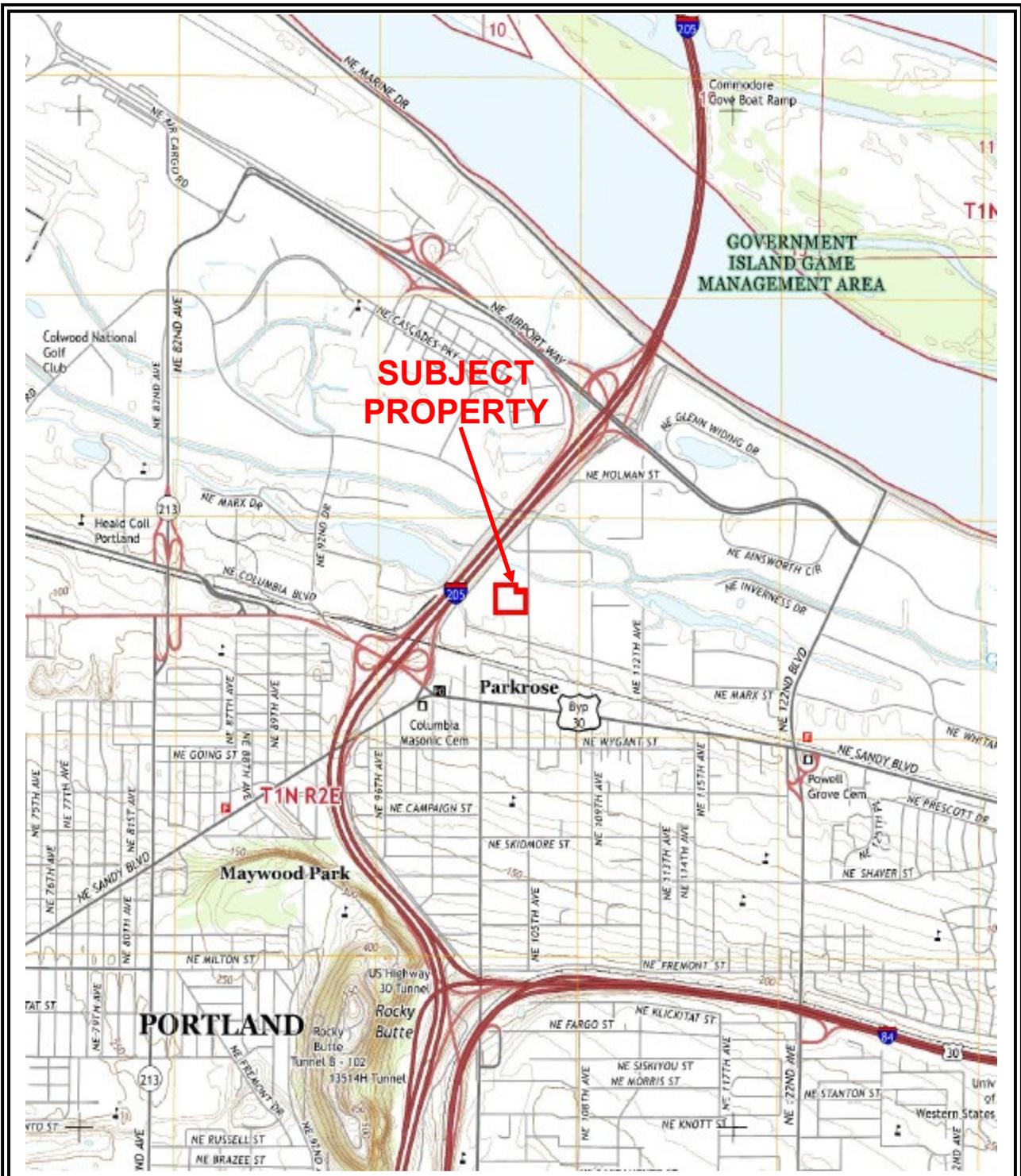
- **On-Site Underground Injection Control (UIC) Well:** According to the regulatory database reviewed, three UIC wells are registered for industrial stormwater drainage (UIC #11673) on the subject property. The UIC wells are located beneath a concrete lid observed in the northeast portion of the subject property, immediately south of the easternmost warehouse. Access to the UIC wells was not provided during the assessment. According to the Subject Property Representative, the wells assist with stormwater drainage from Northeast 105th Avenue (to the east) and are owned and maintained by the municipality. It is presumed that the wells are connected to the surface drainage inlet located in the parking lot on the eastern portion of the subject property, and receive surface drainage from the street and east adjoining properties. No additional information regarding the configuration or condition of the UIC wells has been identified. Based on the unknown configuration and condition of the UIC wells, and the potential for contaminants associated with surface runoff from the roadway and adjoining properties to have been released to the subsurface on the subject property, the on-site UIC wells are considered a REC.
- **Current/Prior Use of Adjoining Properties:** Recycling operations (including metal recycling) have been identified at the west-southwest adjoining property since the 1970s, and the south adjoining property since the early 2000s. Regulatory listings associated with the west-southwest adjoining property identified hazardous waste generation and management (before the establishment of modern regulations), and ODEQ involvement recommending further investigation. Blackstone encountered no evidence of comprehensive environmental investigations into historical adjoining property uses from ODEQ online resources; therefore, based on the inferred groundwater flow direction to the north-northeast (toward the Columbia River) and the close proximity to the subject property, the use of the south and west-southwest adjoining properties as recycling facilities are considered a REC.

The following *Business Environmental Risk Issues* were identified in connection with the subject property:

- **Stormwater Permit:** The former operations on the subject property as an auto salvage facility necessitated that stormwater discharges be regulated under the NPDES 1200-Z Industrial Stormwater General Permit, which was initially required in 2001. This permit required stormwater monitoring, and, if applicable, implementation of corrective actions to maintain compliance. Prior reports indicate that the subject property received several notices of noncompliance from the City of Portland Bureau of Environmental Service (BES) that included failure to collect and analyze samples (2017/2018 and 2018/2019 permit years), failure to meet inspection requirements, failure to meet monitoring requirements, record keeping violations, inadequate Stormwater Pollution Control Plan, and failure to submit Discharge Monitoring Reports. In addition, the ODEQ issued a notice of civil penalty on January 2, 2020, and a notice requiring 205 Auto Salvage to construct a Tier II stormwater impoundment by June 6, 2021. The stormwater impoundment was not developed, and 205 Auto Salvage reportedly ceased operations on June 30, 2021, and sent a notification of the termination of the 1200-Z Permit to BES in March 2022. In September 2022, the ODEQ terminated the industrial and stormwater permits. The owner of the subject property is reportedly negotiating a settlement for all outstanding stormwater violations.
- **Hazardous Substances:** Blackstone observed used tires, engine parts, a 55-gallon drum (labeled as Mercedes Benz Genuine Engine Oil that appeared to be empty), and numerous 5-gallon buckets of hydraulic oil on the ground surface throughout the subject property storage yard. Considering Blackstone observed no physical evidence of spills or releases related to these specific materials, the observed on-site hazardous substances are not considered a REC. However, Blackstone recommends properly storing (i.e., with secondary containment and/or spill protection) and/or disposing of these materials in accordance with all applicable regulations.
- **Asbestos-Containing Materials (ACM):** Based on the construction date of the subject property buildings (circa 1960s to 1980s) and the limited nature of Blackstone's visual survey, Blackstone recommends preparing and implementing a subject property-specific Asbestos Operations and Maintenance (O&M) Program. In addition, Blackstone recommends compliance with Occupational Safety and Health Administration (OSHA) regulations requiring the identification of presumed ACM as well as training, notification, and labeling requirements in operational areas.



APPENDIX A

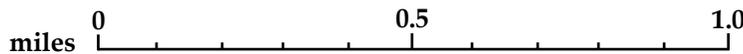


Project No. CRPTCA003.05

4.212-Acre Industrial Property
Portland, Multnomah County, Oregon



Site Location Map
(USGS Mount Tabor, OR Topographic Map, 2020)





Project No. CRPTCA003.05

4.212-Acre Industrial Property
Portland, Multnomah County, Oregon



Subject Property Plan
(Approx. Scale Shown)



PHOTOGRAPH 1

View of the subject property office building and main entry off Northeast 105th Avenue



PHOTOGRAPH 2

View of the secured entry off Northeast 105th Avenue and the two sheds



PHOTOGRAPH 3

View of the easternmost warehouse building



PHOTOGRAPH 4

View of the westernmost warehouse buildings



PHOTOGRAPH 5
View of the garage building



PHOTOGRAPH 6
View of the northern storage yard



PHOTOGRAPH 7
Overall view of the storage yard looking east from the west perimeter



PHOTOGRAPH 8
Overall view of the storage yard looking south from the north perimeter



PHOTOGRAPH 9

Auto and miscellaneous parts storage along the north perimeter of the storage yard



PHOTOGRAPH 10

Wrecked vehicle storage at the southeast portion of the storage yard



PHOTOGRAPH 11

Tires and a 55-gallon oil drum (possibly empty) stored on the ground (southeast part of storage yard)



PHOTOGRAPH 12

5-gallon oil buckets stored on the ground (north part of storage yard)



PHOTOGRAPH 13
Portable AST for unleaded gas



PHOTOGRAPH 13
Two used oil ASTs (reportedly empty) and one 55-gallon drum of "milky" oil



PHOTOGRAPH 15
Storage of 55-gallon drums of oil on pallets in the warehouse



PHOTOGRAPH 16
Automobile batteries



PHOTOGRAPH 17
Forklifts, vehicles being repaired, and engine and transmission parts storage in the westernmost warehouse



PHOTOGRAPH 18
View of the warehouse and mezzanine level



PHOTOGRAPH 19
View of the office interior



PHOTOGRAPH 20
Retention/bioswale area along the western perimeter



PHOTOGRAPH 21
UIC wells beneath the concrete lid



PHOTOGRAPH 22
Storm drain in the parking area near the office



PHOTOGRAPH 23
North adjoining mini-storage facility



PHOTOGRAPH 24
North adjoining commercial business park



PHOTOGRAPH 25
East adjoining semi-truck parking area



PHOTOGRAPH 26
East adjoining municipal pump station and commercial buildings



PHOTOGRAPH 27
Southeast adjoining Parkrose Auto & Truck Repair facility



PHOTOGRAPH 28
South adjoining commercial warehouse (Evergreen Machine Works)



PHOTOGRAPH 29
South adjoining storage yard for King's Roofing



PHOTOGRAPH 30
South adjoining metal recycler



PHOTOGRAPH 31
West-southwest adjoining Republic Services facility



PHOTOGRAPH 32
West-northwest adjoining storage yard for former drum reconditioning and bulk container processing



APPENDIX B

4.212-Acre Industrial Property
5605-5621 Northeast 105th Avenue
Portland, OR 97220

Inquiry Number: 7206697.3

December 29, 2022

Certified Sanborn® Map Report



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

Certified Sanborn® Map Report

12/29/22

Site Name:

4.212-Acre Industrial Property
5605-5621 Northeast 105th Av
Portland, OR 97220
EDR Inquiry # 7206697.3

Client Name:

Blackstone Consulting, LLC
5500 Rolling Meadows Court
Saint Louis, MO 63129
Contact: Erica Ervine



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Certified Sanborn Results:

Certification # 6CAB-4557-8A36
PO # NA
Project CRPTCA003



Sanborn® Library search results

Certification #: 6CAB-4557-8A36

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4.212-Acre Industrial Property

5605-5621 Northeast 105th Avenue

Portland, OR 97220

Inquiry Number: 7206697.8

December 29, 2022

The EDR Aerial Photo Decade Package



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

Site Name:

4.212-Acre Industrial Property
 5605-5621 Northeast 105th Av
 Portland, OR 97220
 EDR Inquiry # 7206697.8

Client Name:

Blackstone Consulting, LLC
 5500 Rolling Meadows Court
 Saint Louis, MO 63129
 Contact: Erica Ervine



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Search Results:

<u>Year</u>	<u>Scale</u>	<u>Details</u>	<u>Source</u>
2020	1"=500'	Flight Year: 2020	USDA/NAIP
2016	1"=500'	Flight Year: 2016	USDA/NAIP
2014	1"=500'	Flight Year: 2014	USDA/NAIP
2011	1"=500'	Flight Year: 2011	USDA/NAIP
2006	1"=500'	Flight Year: 2006	USDA/NAIP
2001	1"=500'	Acquisition Date: January 01, 2001	USGS/DOQQ
1994	1"=500'	Acquisition Date: June 20, 1994	USGS/DOQQ
1990	1"=500'	Acquisition Date: January 01, 1990	USGS/DOQQ
1981	1"=500'	Flight Date: July 26, 1981	USDA
1975	1"=500'	Flight Date: September 13, 1975	USGS
1970	1"=500'	Flight Date: July 06, 1970	USGS
1963	1"=500'	Flight Date: June 14, 1963	USDA
1960	1"=500'	Flight Date: July 17, 1960	USGS
1955	1"=500'	Flight Date: August 06, 1955	USDA
1951	1"=500'	Flight Date: July 27, 1951	USGS
1948	1"=500'	Flight Date: July 13, 1948	USDA
1935	1"=500'	Flight Date: January 01, 1935	ACOE

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INQUIRY #: 7206697.8

YEAR: 2020

— = 500'





SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 2016

— = 500'





SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 2014

— = 500'





SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 2011

— = 500'





SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 2006

— = 500'





SUBJECT PROPERTY

UNMAPPED

INQUIRY #: 7206697.8

YEAR: 2001



= 500'

UNMAPPED

UNMAPPED

UNMAPPED

UNMAPPED



SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 1994

— = 500'



Subject boundary not shown because it exceeds image extent or image is not georeferenced.



SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 1990

— = 500'





SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 1981

— = 500'





SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 1975

— = 500'





SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 1970

— = 500'





SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 1963

— = 500'





SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 1960

— = 500'





SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 1955

— = 500'





SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 1951

— = 500'





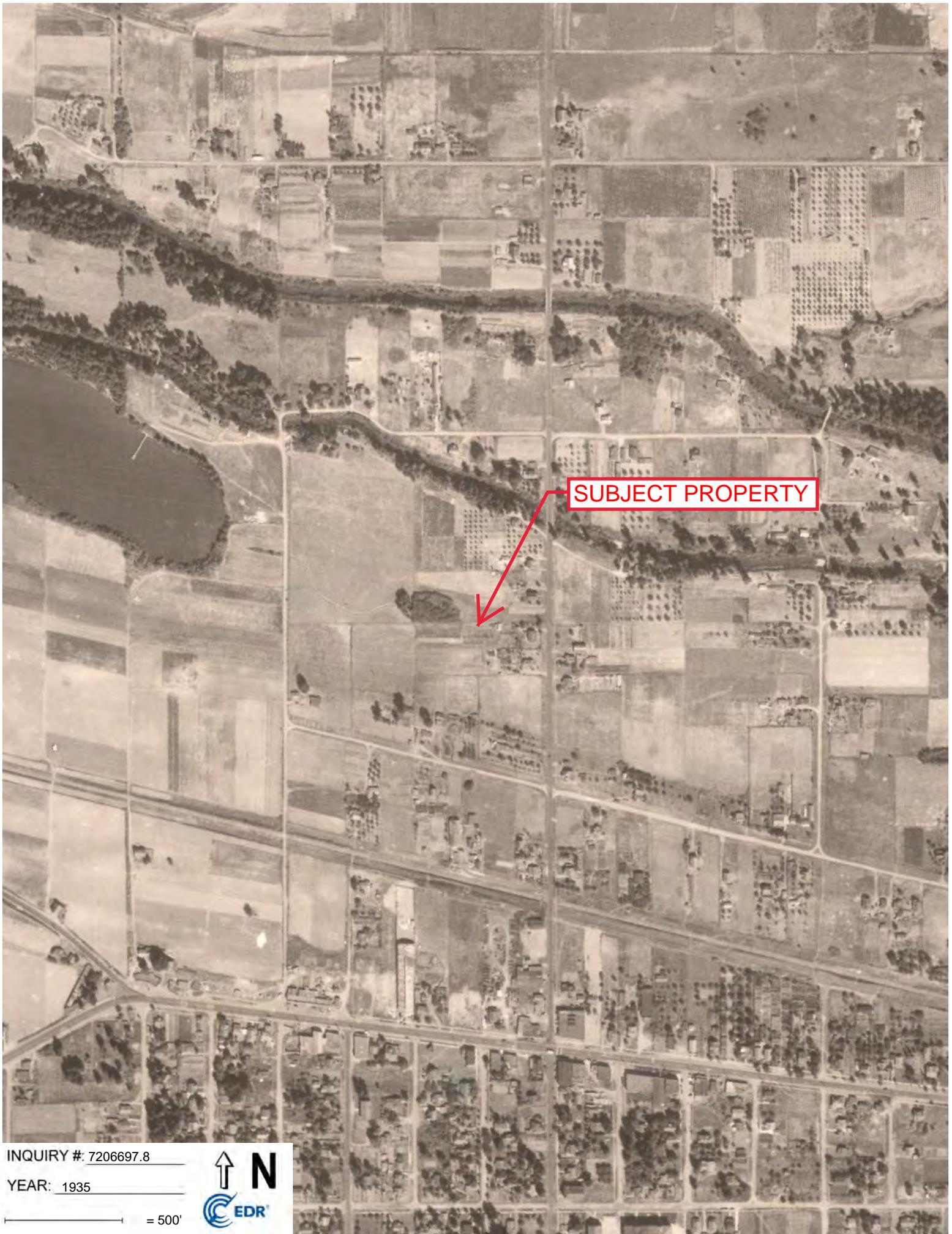
SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 1948

— = 500'





SUBJECT PROPERTY

INQUIRY #: 7206697.8

YEAR: 1935

— = 500'



4.212-Acre Industrial Property
5605-5621 Northeast 105th Avenue
Portland, OR 97220

Inquiry Number: 7206697.4

December 29, 2022

EDR Historical Topo Map Report

with QuadMatch™



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Historical Topo Map Report

12/29/22

Site Name:

4.212-Acre Industrial Property
5605-5621 Northeast 105th Av
Portland, OR 97220
EDR Inquiry # 7206697.4

Client Name:

Blackstone Consulting, LLC
5500 Rolling Meadows Court
Saint Louis, MO 63129
Contact: Erica Ervine



EDR Topographic Map Library has been searched by EDR and maps covering the target property location as provided by Blackstone Consulting, LLC were identified for the years listed below. EDR's Historical Topo Map Report is designed to assist professionals in evaluating potential liability on a target property resulting from past activities. EDR's Historical Topo Map Report includes a search of a collection of public and private color historical topographic maps, dating back to the late 1800s.

Search Results:**Coordinates:**

P.O.#	NA	Latitude:	45.563583 45° 33' 49" North
Project:	CRPTCA003	Longitude:	-122.555885 -122° 33' 21" West
		UTM Zone:	Zone 10 North
		UTM X Meters:	534658.20
		UTM Y Meters:	5045656.34
		Elevation:	18.56' above sea level

Maps Provided:

2020	1961
2017	1954
2014	1940
1995	1905
1978	1897
1976	
1975	
1970	

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Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

2020 Source Sheets



Mount Tabor
2020
7.5-minute, 24000

2017 Source Sheets



Mount Tabor
2017
7.5-minute, 24000

2014 Source Sheets



Mount Tabor
2014
7.5-minute, 24000

1995 Source Sheets

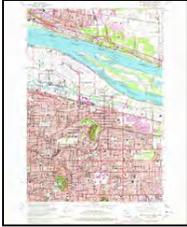


Mount Tabor
1995
7.5-minute, 24000
Aerial Photo Revised 1990

Topo Sheet Key

This EDR Topo Map Report is based upon the following USGS topographic map sheets.

1978 Source Sheets



Mount Tabor
1978
7.5-minute, 24000
Aerial Photo Revised 1975

1976 Source Sheets



Mount Tabor
1976
7.5-minute, 24000
Aerial Photo Revised 1975

1975 Source Sheets



Mount Tabor
1975
7.5-minute, 24000
Aerial Photo Revised 1975

1970 Source Sheets

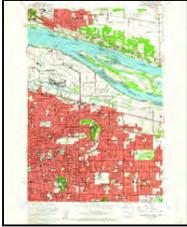


Mount Tabor
1970
7.5-minute, 24000
Aerial Photo Revised 1970

Topo Sheet Key

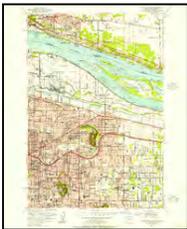
This EDR Topo Map Report is based upon the following USGS topographic map sheets.

1961 Source Sheets



Mount Tabor
1961
7.5-minute, 24000
Aerial Photo Revised 1960

1954 Source Sheets



Mount Tabor
1954
7.5-minute, 24000
Aerial Photo Revised 1952

1940 Source Sheets



PORTLAND
1940
15-minute, 50000

1905 Source Sheets



Portland
1905
15-minute, 62500

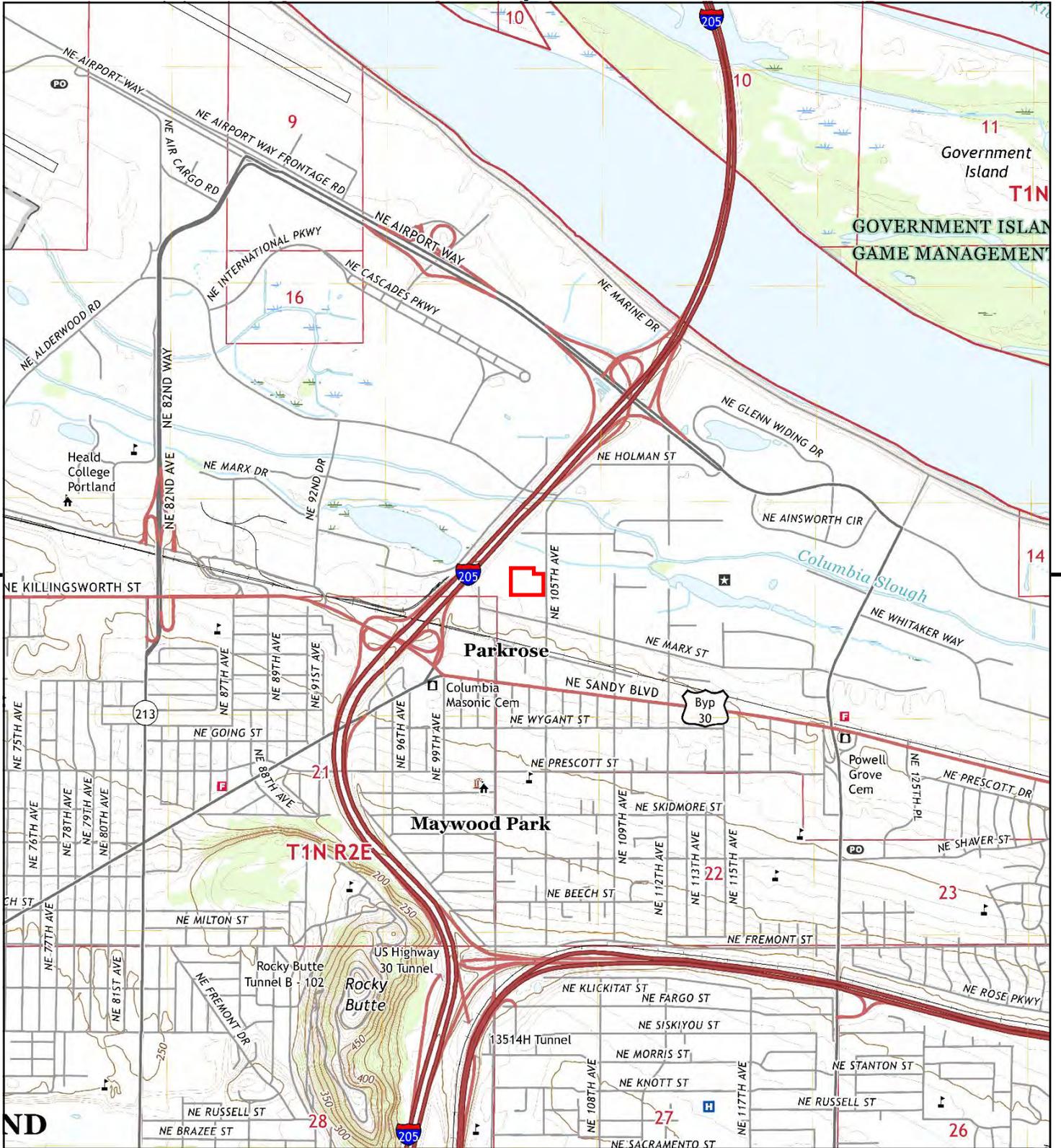
Topo Sheet Key

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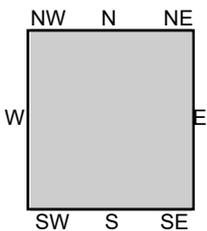
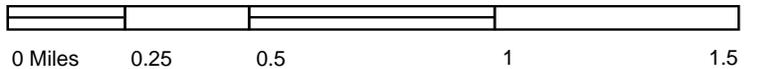
1897 Source Sheets



Portland
1897
15-minute, 62500



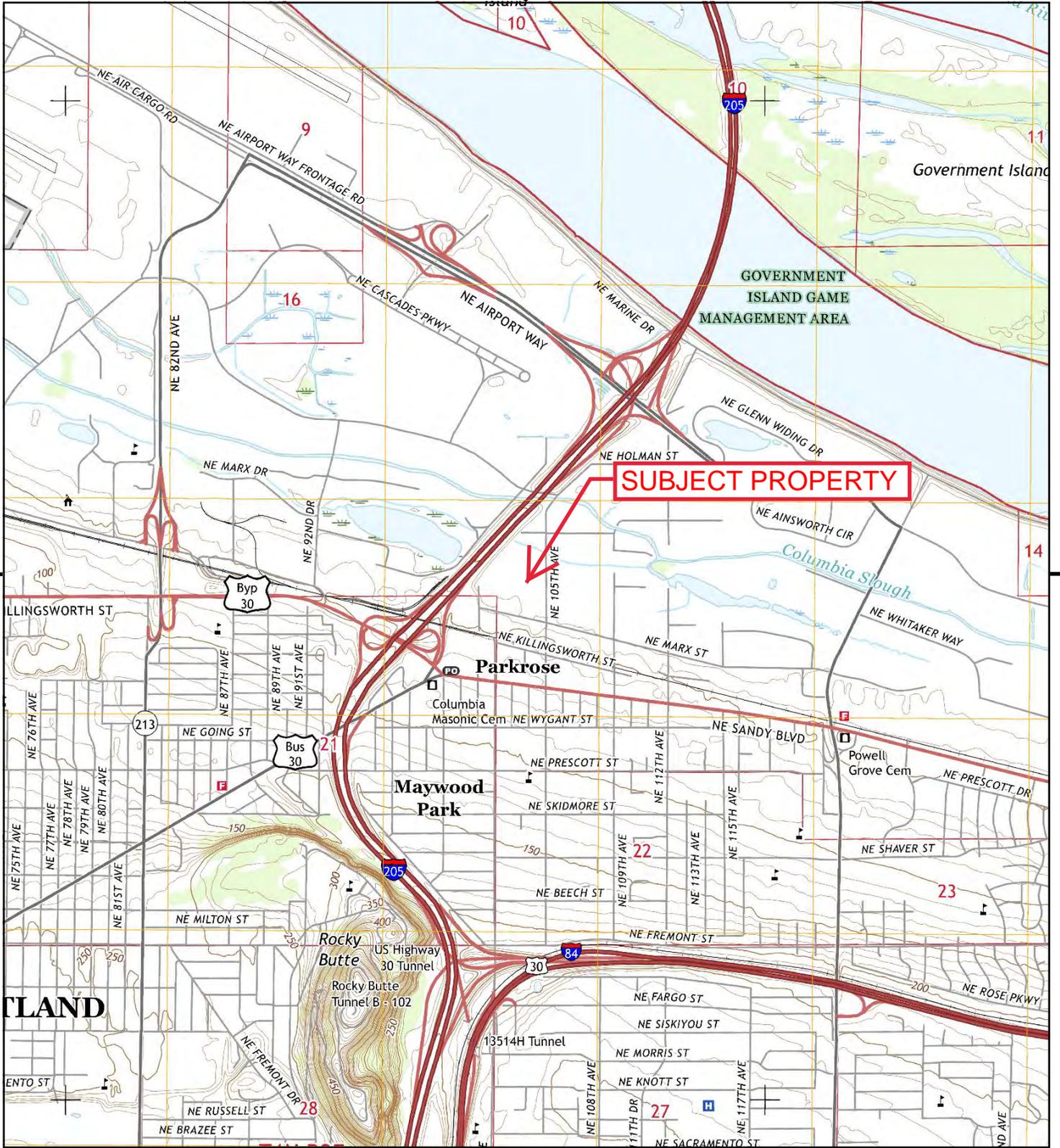
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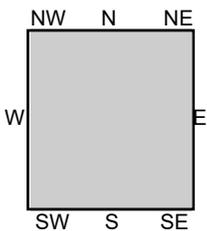
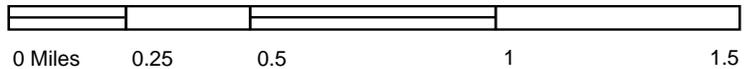
TP, Mount Tabor, 2020, 7.5-minute

SITE NAME: 4.212-Acre Industrial Property
ADDRESS: 5605-5621 Northeast 105th Avenue
 Portland, OR 97220
CLIENT: Blackstone Consulting, LLC





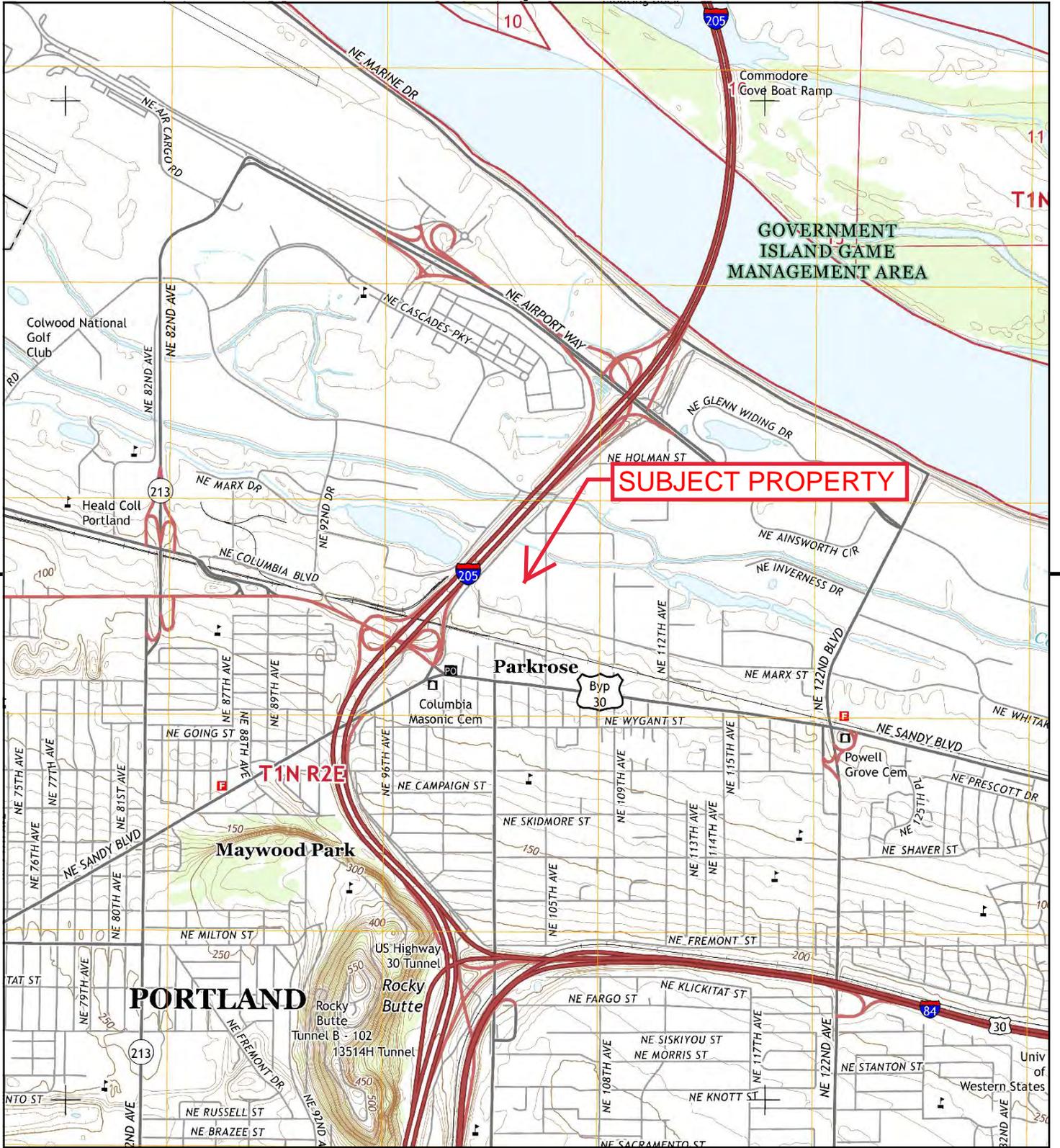
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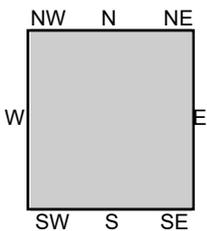
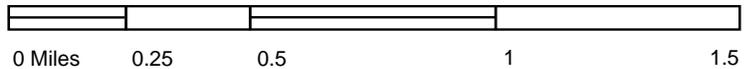
TP, Mount Tabor, 2017, 7.5-minute

SITE NAME: 4.212-Acre Industrial Property
ADDRESS: 5605-5621 Northeast 105th Avenue
 Portland, OR 97220
CLIENT: Blackstone Consulting, LLC





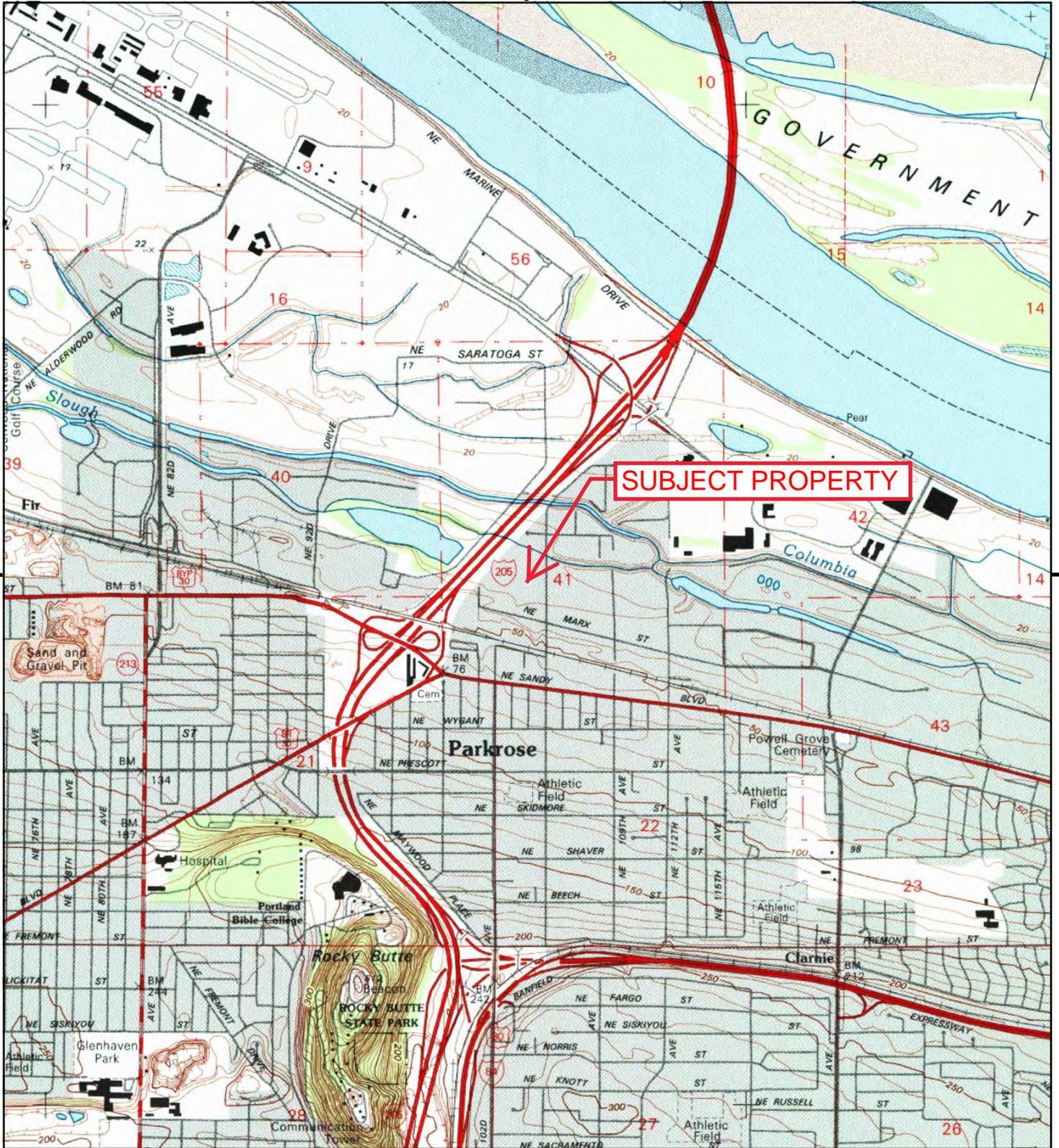
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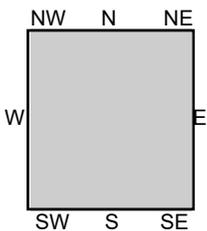
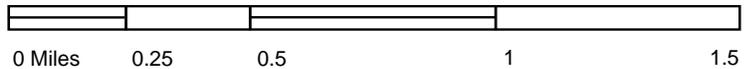
TP, Mount Tabor, 2014, 7.5-minute

SITE NAME: 4.212-Acre Industrial Property
 ADDRESS: 5605-5621 Northeast 105th Avenue
 Portland, OR 97220
 CLIENT: Blackstone Consulting, LLC





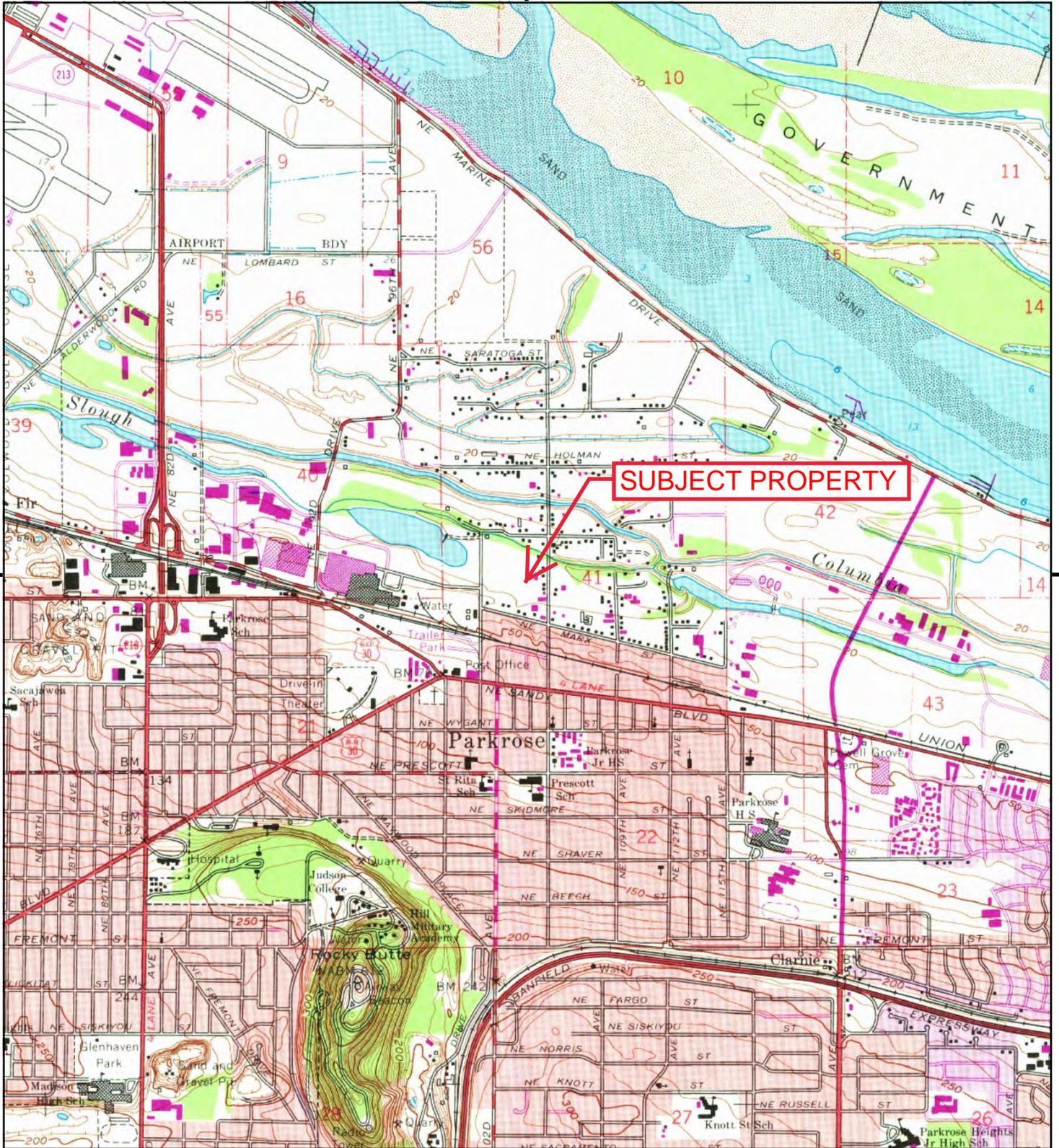
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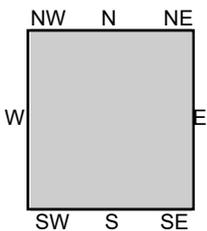
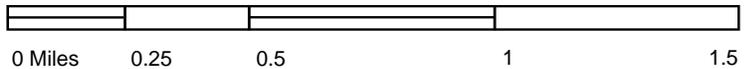
TP, Mount Tabor, 1995, 7.5-minute

SITE NAME: 4.212-Acre Industrial Property
 ADDRESS: 5605-5621 Northeast 105th Avenue
 Portland, OR 97220
 CLIENT: Blackstone Consulting, LLC





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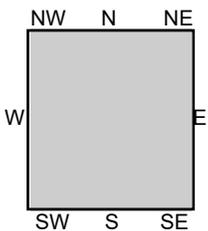
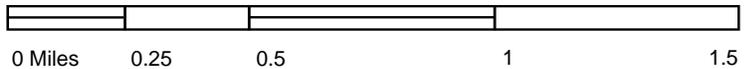
TP, Mount Tabor, 1978, 7.5-minute

SITE NAME: 4.212-Acre Industrial Property
 ADDRESS: 5605-5621 Northeast 105th Avenue
 Portland, OR 97220
 CLIENT: Blackstone Consulting, LLC





This report includes information from the following map sheet(s).



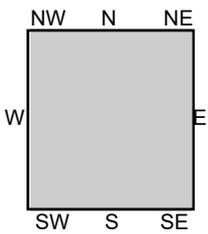
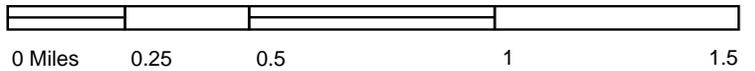
TP, Mount Tabor, 1976, 7.5-minute

SITE NAME: 4.212-Acre Industrial Property
ADDRESS: 5605-5621 Northeast 105th Avenue
Portland, OR 97220
CLIENT: Blackstone Consulting, LLC





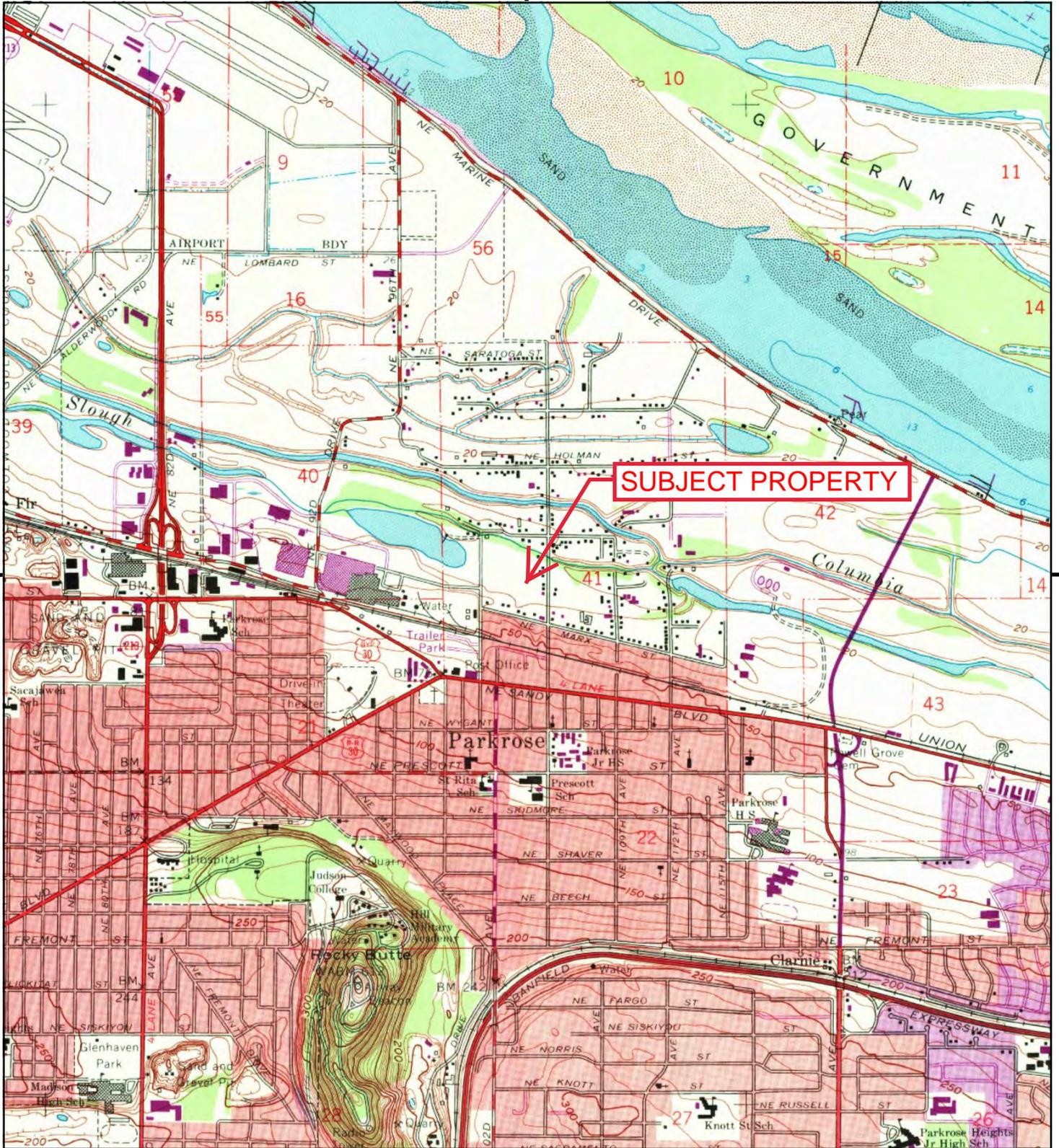
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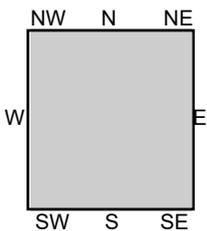
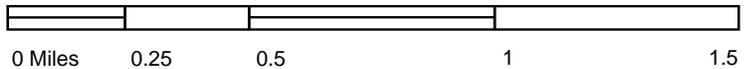
TP, Mount Tabor, 1975, 7.5-minute

SITE NAME: 4.212-Acre Industrial Property
ADDRESS: 5605-5621 Northeast 105th Avenue
Portland, OR 97220
CLIENT: Blackstone Consulting, LLC





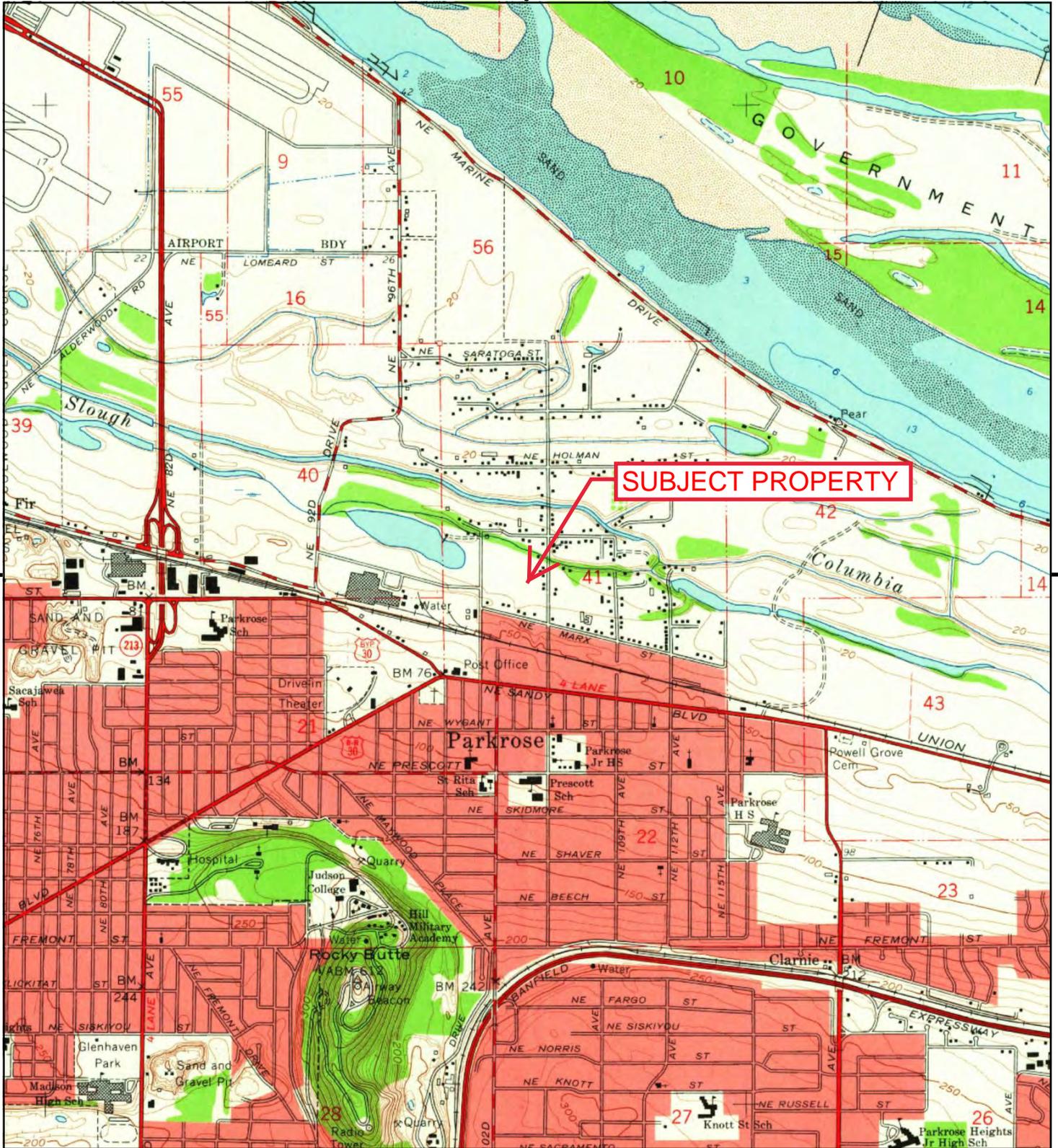
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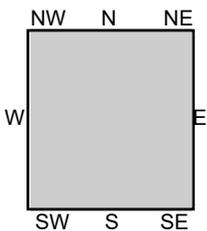
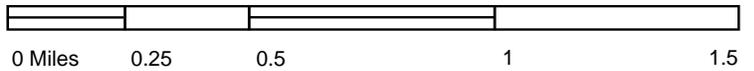
TP, Mount Tabor, 1970, 7.5-minute

SITE NAME: 4.212-Acre Industrial Property
 ADDRESS: 5605-5621 Northeast 105th Avenue
 Portland, OR 97220
 CLIENT: Blackstone Consulting, LLC





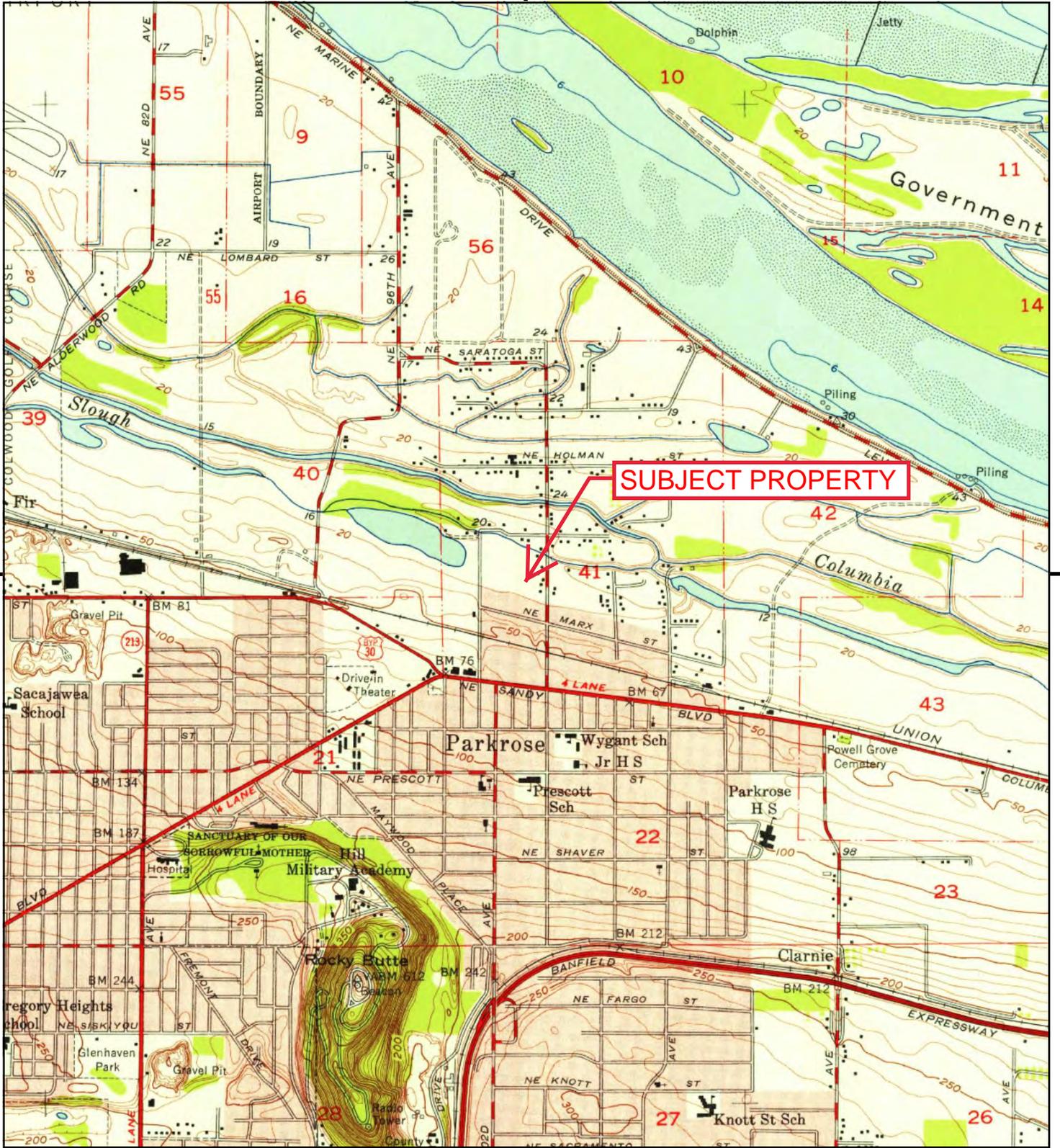
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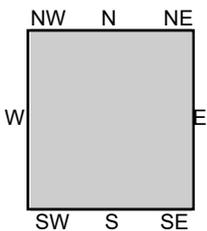
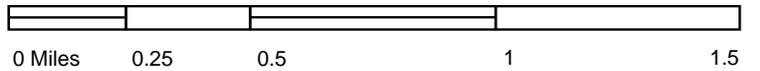
TP, Mount Tabor, 1961, 7.5-minute

SITE NAME: 4.212-Acre Industrial Property
 ADDRESS: 5605-5621 Northeast 105th Avenue
 Portland, OR 97220
 CLIENT: Blackstone Consulting, LLC





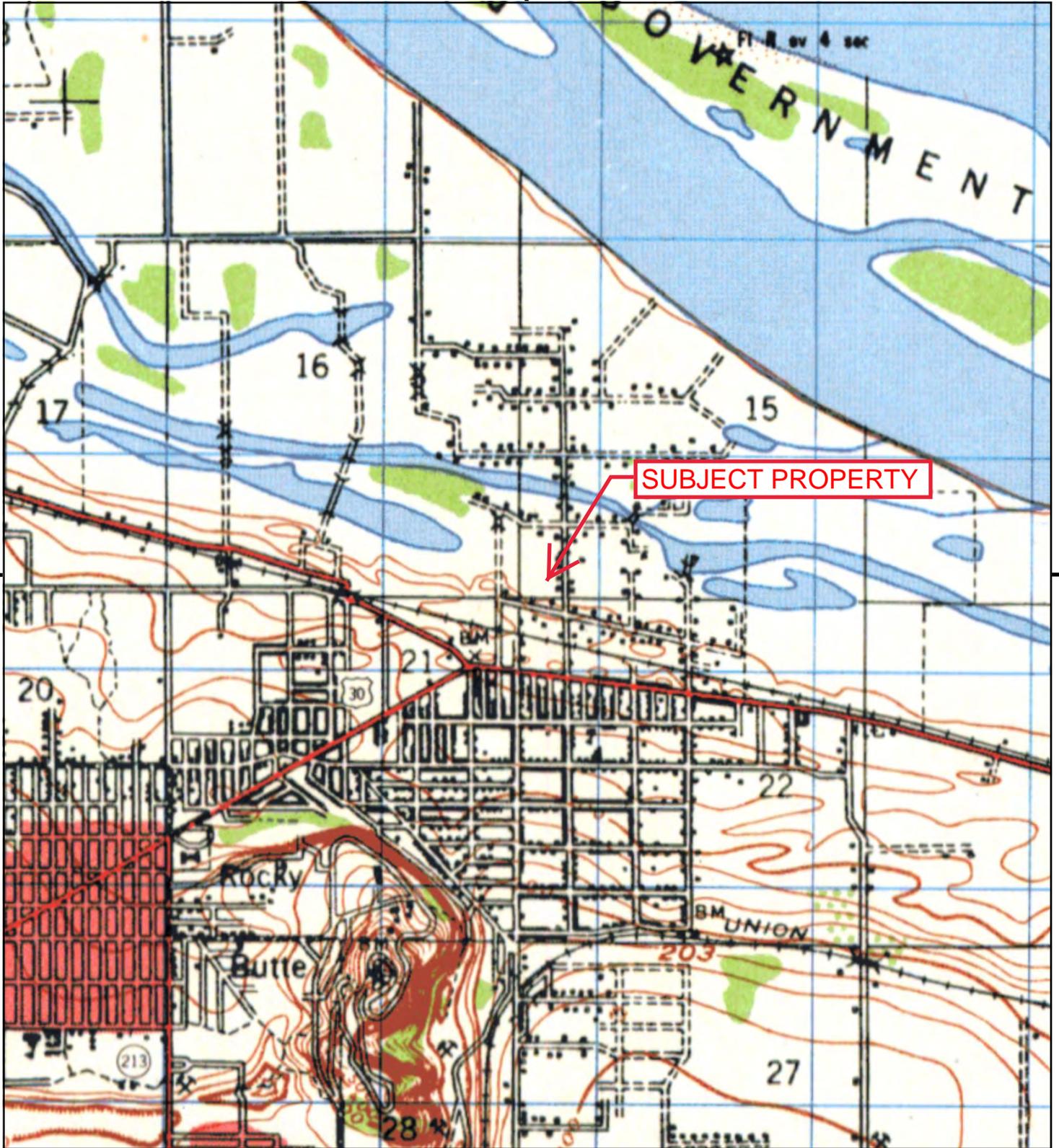
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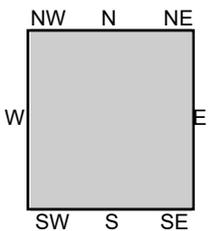
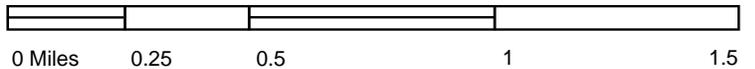
TP, Mount Tabor, 1954, 7.5-minute

SITE NAME: 4.212-Acre Industrial Property
 ADDRESS: 5605-5621 Northeast 105th Avenue
 Portland, OR 97220
 CLIENT: Blackstone Consulting, LLC





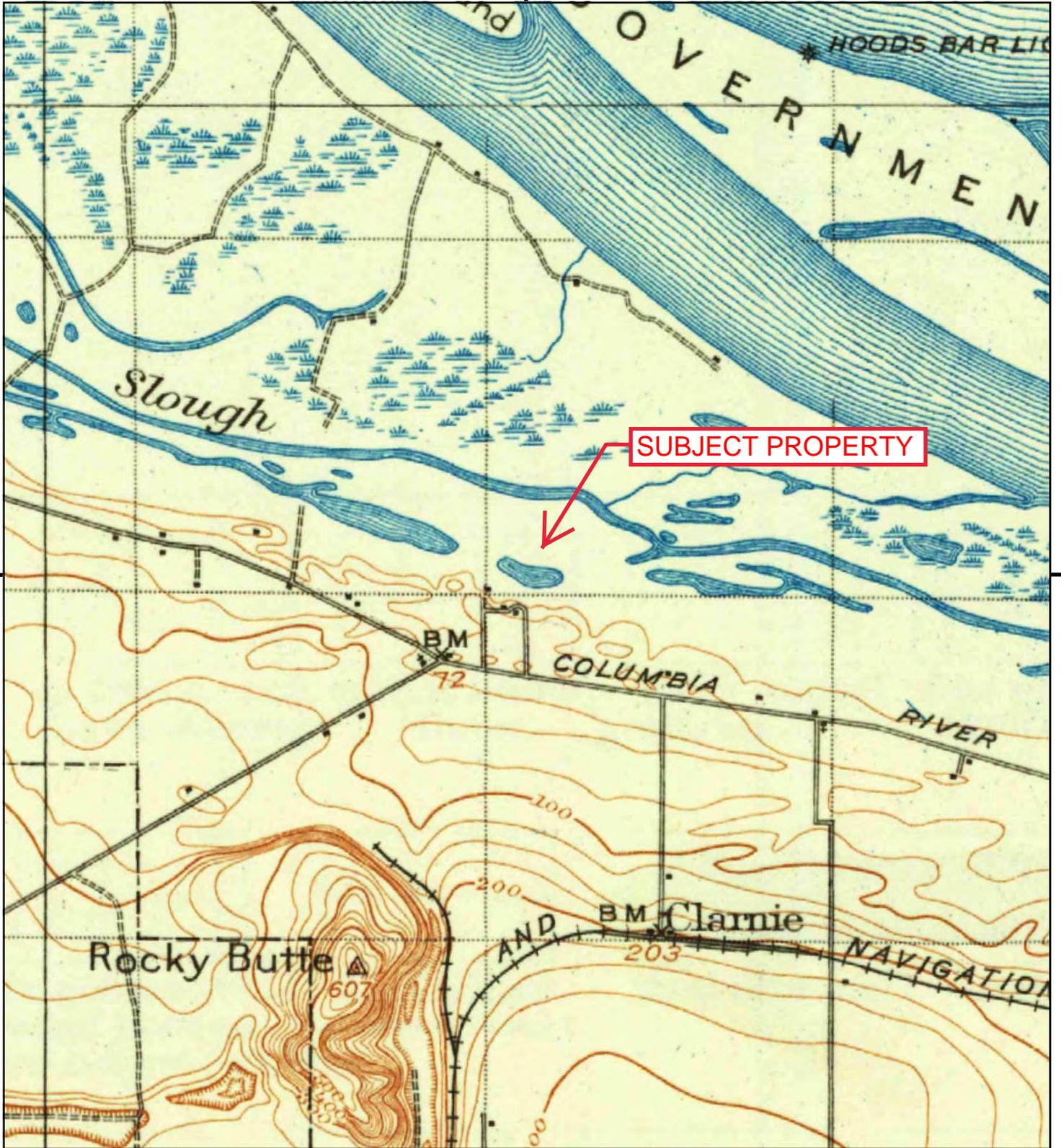
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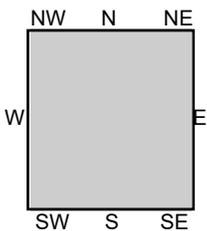
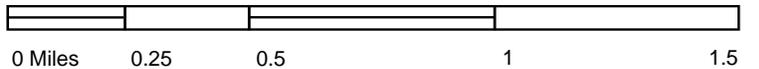
TP, PORTLAND, 1940, 15-minute

SITE NAME: 4.212-Acre Industrial Property
 ADDRESS: 5605-5621 Northeast 105th Avenue
 Portland, OR 97220
 CLIENT: Blackstone Consulting, LLC





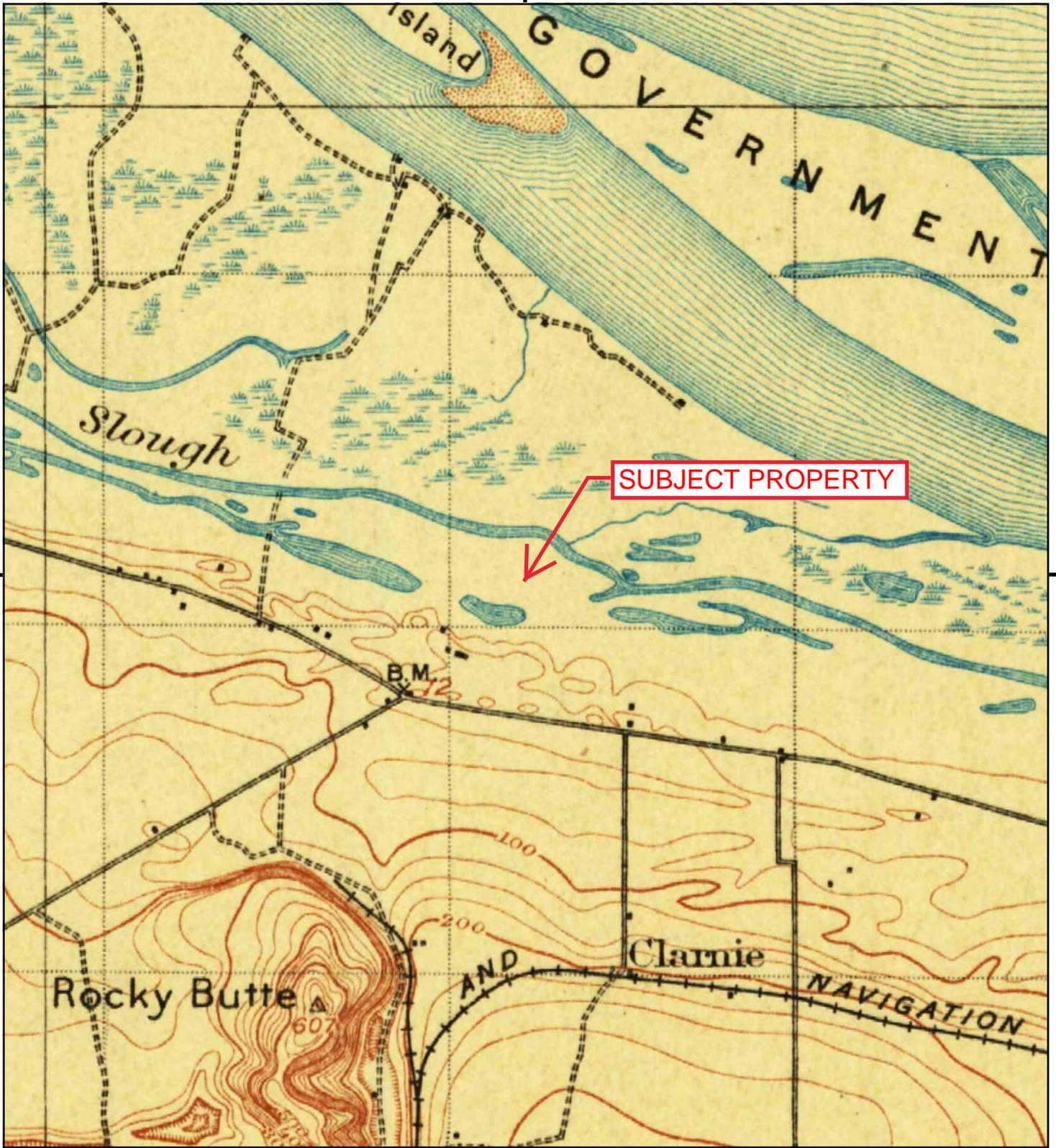
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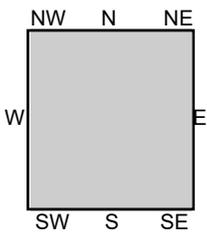
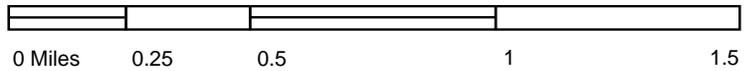
TP, Portland, 1905, 15-minute

SITE NAME: 4.212-Acre Industrial Property
 ADDRESS: 5605-5621 Northeast 105th Avenue
 Portland, OR 97220
 CLIENT: Blackstone Consulting, LLC





This report includes information from the following map sheet(s).



TP, Portland, 1897, 15-minute

SITE NAME: 4.212-Acre Industrial Property
ADDRESS: 5605-5621 Northeast 105th Avenue
Portland, OR 97220
CLIENT: Blackstone Consulting, LLC

