Phase I Environmental Site Assessment

Albina Campus

Portland, Oregon

July 31, 2025

Report Viability Date:
December 31, 2025

Geotechnical ■ Environmental ■ Special Inspections

Columbia West
Engineering, Inc

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Columbia West Engineering, Inc

Vancouver, Washington • Phone: 360-823-2900
Portland, Oregon • Phone: 971-384-1666
www.columbia-west.com

July 31, 2025

Project^
3514 North Vancouver Avenue #200
Portland, OR 97227

Attn: Chris Jones

Re: Phase I Environmental Site Assessment
Albina Campus
Intersection of North Albina Avenue and North Russell Street
Portland, Oregon
CWE Project: Project-3-02-1

Columbia West Engineering, Inc. (Columbia West) is pleased to present this Phase I ESA report of the Albina Campus generally located within the two city blocks bounded by North Knott Street, North Mississippi Avenue, North Russell Street, and North Borthwick Avenue in Portland, Oregon (subject property). The subject property also includes two smaller areas on the north and east sides of North Knott Street and North Borthwick Avenue, respectively. Our services were conducted in conformance with the standards and practices for AAI specified in Title 40, Chapter I of CFR Part 312; ASTM E1527-21, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*; and our proposal dated June 3, 2025.

We appreciate the opportunity to work with Project^. Please contact us if you have questions regarding this report.

Sincerely,

Caroline B. Siegel
Environmental Project Manager

Colby R. Hunt, CHMM
Environmental Principal

CBS:CRH:kat
Attachments
Document ID: Project-3-02-1-073125-envr-DRAFT2.docx

EXECUTIVE SUMMARY

Columbia West conducted a Phase I ESA of the Albina Campus (subject property), generally located within the two city blocks bounded by North Knott Street, North Mississippi Avenue, North Russell Street, and North Borthwick Avenue in Portland, Oregon. The Phase I ESA was conducted in conformance with the standards and practices for AAI specified in Title 40, Chapter I of CFR Part 312 (40 CFR Part 312); ASTM E1527-21, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*; and our proposal dated June 3, 2025. Any exceptions to or deviations from this practice are described in Section 1.2 (Scope of Services) and Section 10.0 (Limitations). Please note that this section provides a summary of the findings of this Phase I ESA and some details were not included or were not fully developed. Therefore, the report must be read in its entirety for a more complete understanding of the findings, conclusions, and recommendations contained herein.

Acronyms and abbreviations used herein are defined immediately following the Table of Contents.

SUBJECT PROPERTY AND VICINITY DESCRIPTION

Size	3.17 acres
Tax Lots	2000, 2300, 2500, 2600, 2700, 2800, 2900, 3300, 3400, 3500, 7100, 7200, 7300, 7400, 7500, 7900, 8000, and 8200 of Multnomah County tax map 1N1E27BD
Current Use	Commercial and industrial
Significant Features	Commercial buildings with paved and gravel parking areas
Vicinity Use	Residential, commercial, and industrial

SITE RECONNAISSANCE

During the site reconnaissance, we observed some minor surface staining in the vicinity of four 55-gallon drums observed immediately east of the upper HVAC shop (tax lot 2900). We did not observe any significant cracks or holes in the asphalt near the drums.

HISTORICAL RECORDS

Historical records indicate that by 1889, the subject property was occupied by several residences, a church, and a commercial building. Commercial and industrial use gradually increased on the subject property throughout the 1900s. Commercial and industrial occupants most notably included an asbestos factory, dry cleaners, and auto repair facilities, and heating oil USTs were installed at the subject property. Streimer has operated on portions of the subject property dating back to at least 1960. The last residence was removed from the subject property by 2016, at which time the subject property resembled its current configuration, with demolition of one commercial structure occupied by Streimer occurring between 2022 and 2024.

ENVIRONMENTAL RECORDS REVIEW

The subject property was listed on the following environmental databases:

Database	Listing Summary
EPA RCRAInfo	VSQG – no violations reported.
DEQ UST Facility ID No. 4749	1,000-gallon gasoline UST decommissioned by removal in 1989.
DEQ LUST File No. 26-95-0131	Leaking 500-gallon heating oil UST decommissioned by removal in 1995. Received NFA in 2008. Petroleum-impacted soil remains onsite.
DEQ LUST File No. 26-08-0191	Leaking 675-gallon heating oil UST decommissioned in place in 2008. Received NFA in 2008. Petroleum-impacted soil remains onsite.
DEQ ECSI No. 6582	Former First Class Dry Cleaner operated on the subject property from at least 1950 through 1975.
DEQ Tank HOT Decom ID 49885	340-gallon heating oil UST decommissioned by removal in 2023 with no evidence of leaks.
Oregon Tier 2 and HSIS	Historical storage of compressed gas.
EPA FINDS/FRS	Reference database, refers to above subject property listings.

The following surrounding sites were listed on the following environmental databases:

Site Name and Database	Distance	Listing Summary
Tarr Inc. (DEQ ECSI No. 1139)	Adjoining south across North Russell Street	VOCs in ambient air, soil vapor, and groundwater
Former Campbell Dry Cleaner (DEQ ECSI No. 5680)	Adjoining east	PCE, TCE, and chloroform in soil gas and/or groundwater
Environmental Protective Services (SWF/LF Facility ID 109442)	Adjoining south	Former fluorescent light tube recycling facility
Heating Oil Tank – 836 N Russell Street (DEQ LUST File No. 26-09-0517)	Adjoining south across North Russell Street	Heating oil release; impacts limited to soil only

PREVIOUS INVESTIGATIONS

The results of previous environmental investigations at the subject property are summarized below.

NV5 (FEBRUARY 2, 2023)

NV5 conducted a Phase II ESA of tax lots 2500, 2600, 2700, 2800, and 2900 in February 2023. The Phase II ESA included conducting a geophysical survey in the areas of historical auto repair shops on tax lots 2700 and 2800 and collecting soil, soil gas, and soil vapor samples from this portion of the subject property.

The geophysical survey identified a potential UST and a potential UST excavation on tax lot 2700 and an irregularly shaped pit containing ferric debris on tax lot 2800. The results of this February 2023 Phase II ESA indicated the presence of fill material with antimony and lead at concentrations greater than DEQ CFSLs. Benzene and 1,3-butadiene were detected in a soil gas sample collected from tax lot 2700 at concentrations exceeding DEQ *Vapor Intrusion into Buildings* chronic RBCs for residential and commercial receptors. Benzene, 1,3-butadiene, and/or PCE were detected at concentrations greater than the DEQ *Vapor Intrusion into Buildings* chronic RBCs for residential receptors. The detected concentrations of these contaminants in soil gas may be associated with the Tarr Inc. facility located adjacent south of the subject property.

NV5 (FEBRUARY 8, 2023)

NV5 conducted a Phase II ESA of tax lots 7100, 7200, 7300, 7400, 7500, 7900, 8000, and 8200 of the subject property in February 2023. The Phase II ESA included conducting a geophysical survey of tax lot 8000 and in the vicinity of the former heating oil UST on tax lot 7500 and collecting soil and soil gas samples from this portion of the subject property.

The geophysical survey identified a backfilled excavation on tax lot 7500 at the approximate reported location of the former heating oil UST associated with LUST File No. 26-95-0131 and an apparent decommissioned-in-place heating oil UST on tax lot 7900 associated with LUST File No. 26-09-0191.

Diesel- and oil-range hydrocarbons, PAHs, and PCBs were either not detected or were detected at concentrations less than occupational DEQ RBCs in the soil samples collected from this portion of the subject property. PCE and TCE were not detected at concentrations greater than occupational DEQ RBCs in the soil sample collected from boring DP-11. Several metals were detected at concentrations greater than DEQ CFSLs in fill material encountered in the borings, and lead was detected in a soil sample collected from tax lot 7900 at a concentration greater than the DEQ *Soil Ingestion, Dermal Contact, and Inhalation* RBC for residential receptors.

Asbestos was detected in shallow soil samples (i.e., 0 to 2 feet BGS) collected from the vicinity of the asbestos factory formerly located on tax lot 7400.

PCE and TCE were detected in soil gas samples collected from tax lot 7900 at concentrations greater than the DEQ *Vapor Intrusion into Buildings* chronic and/or acute RBCs for residential and/or commercial receptors. The former Campbell Dry Cleaner site, from which impacted soil gas is known to extend onto the subject property, is located adjacent east of tax lot 7900.

NV5 (JUNE 2023)

NV5 conducted additional soil characterization of the former asbestos factory in June 2023. The results of the additional soil characterization indicated the presence of asbestos in shallow soil extending from tax lot 7400 east across North Albina Avenue, south to the south portion of tax lot 7500, and west to the west portion of tax lot 7300. The northern extent of asbestos-containing soil appears to have been delineated; however, the eastern, southern, and western extents of asbestos-containing soil do not appear to have been delineated.

K&S ENVIRONMENTAL, INC. (2023)

K&S Environmental, Inc. decommissioned an empty, 340-gallon heating oil UST from tax lot 2700 in December 2023. Diesel-range hydrocarbons were not detected in confirmation soil samples collected from beneath the heating oil UST, and DEQ registered the closure certification on March 13, 2024.

FINDINGS AND OPINIONS

The results of the Phase I ESA indicate the following regarding the subject property:

- An asbestos factory was historically located on tax lot 7400 from at least 1924 through 1936. Previous soil sampling at the subject property identified asbestos in soil in the vicinity of the former asbestos factory at depths of up to 2 feet BGS. The presence of asbestos in soil at the subject property represents a REC.
- The subject property is listed on the ECSI database under First Class Dry Cleaner (ECSI No. 6582). First Class Dry Cleaner operated on tax lot 2700 from at least 1950 through 1975. The active ECSI listing represents a REC at the subject property.
- The Tarr Inc. site (ECSI No. 1139) adjoins the subject property to the south, across North Russell Street. Soil, soil vapor, and groundwater have been impacted by VOCs and petroleum hydrocarbons and the Tarr Inc. site entered into the DEQ VCP in 2005. Remediation and monitoring efforts are ongoing, and the south portion of the subject property is located within the LOF. The release from the Tarr Inc. site and associated soil gas impacts at the subject property represents a REC at the subject property.
- The former Campbell Dry Cleaner (ECSI No. 5680) operated on an adjoining property from approximately 1952 through 1996. In 2014, chloroform, PCE, and TCE were detected in groundwater and soil gas samples collected from the subject property at concentrations greater than DEQ RBCs. In 2016, a partial NFA determination was issued for ECSI No. 5680 that applied only to the former dry cleaner site and did not apply to off-site properties. On-site impacts from the former Campbell Dry Cleaner site represent a REC at the subject property.
- LUST File No. 26-95-0131 is associated with a 500-gallon heating oil UST decommissioned by removal from tax lot 7500 in 1995. Approximately 5 to 10 cubic yards of impacted soil remained at a depth of approximately 10 to 15 feet BGS. While LUST File No. 26-95-0131 received an NFA determination from DEQ in 2008, petroleum-impacted soil remains in the vicinity of this UST at concentrations greater than DEQ RBCs. A previous subsurface investigation did not identify petroleum hydrocarbons adjacent to the UST excavation at concentrations greater than DEQ RBCs. While a pocket of soil containing elevated petroleum hydrocarbons likely remains within the former UST excavation, its extent has been delineated. Therefore, LUST File No. 26-95-0131 represents a CREC at the subject property.

- LUST File No. 26-08-0191 is associated with a 675-gallon decommissioned-in-place heating oil UST on tax lot 7900 in 2008. Diesel-range hydrocarbons remain in soil at concentrations greater than DEQ RBCs. However, the full vertical and horizontal extents of the impacted soil were delineated, with an estimated volume of approximately 34 cubic yards. While LUST File No. 26-08-0191 received an NFA determination from DEQ in 2008, petroleum-impacted soil remains in the vicinity of the decommissioned-in-place UST at concentrations greater than DEQ RBCs. LUST File No. 26-08-0191 represents a CREC at the subject property.
- The subject property is listed on the DEQ UST database as Facility ID No. 4749 due to a 1,000-gallon gasoline UST decommissioned by removal in 1989. The UST was formerly located beneath the east portion of the upper HVAC shop on tax lot 2900. It does not appear that confirmation soil samples were collected from the UST cavity during decommissioning. However, a previous subsurface investigation did not identify soil gas in the vicinity of the former UST as containing gasoline-range hydrocarbons or VOCs at concentrations greater than applicable DEQ RBCs. Therefore, the former 1,000-gallon UST does not represent a REC at the subject property.
- The subject property is listed on the DEQ Tank HOT Decom database under HOT ID 49885 due to a heating oil UST decommissioned by removal from tax lot 2700 on November 30, 2023, after the former tool storage warehouse was demolished. Confirmation soil samples did not indicate that the heating oil UST had leaked. The former heating oil UST associated with HOT ID 49885 does not represent a REC at the subject property.
- Four 55-gallon drums were observed immediately east of the upper HVAC shop. Some staining was observed on the asphalt near these drums. We did not observe any significant cracks or holes in the asphalt near the drums, and the staining represents a de minimis condition at the subject property.
- Previous subsurface investigations at the subject property identified fill material containing debris, including wood, porcelain, and red brick. In addition, select soil samples collected from fill material at the subject property during previous investigations contained metals at concentrations greater than DEQ CFSLs. While not a REC at the subject property, fill material containing debris and/or contaminants at concentrations greater than DEQ CFSLs does not qualify as clean fill and should be disposed of at a RCRA Subtitle D landfill.
- A potential UST vent pipe was observed on the south side of the Left Bank Lofts building located north of the west portion of the subject property across North Knott Street. Based on the inferred groundwater gradient, depth to groundwater at the subject property, and distance of the potential vent pipe across North Knott Street, the potential UST on the north adjoining property is unlikely to have impacted the subject property and does not represent a REC at the subject property.
- A previous subsurface investigation did not identify soil or soil gas impacts in the vicinities of the former auto repair shops on tax lot 2700 and 2800. Therefore, the former auto repair shops do not represent a REC at the subject property.

- An oil burner was historically located on tax lot 8000. Decommissioning records for a heating oil UST associated with the oil burner were not readily available. However, a geophysical survey conducted in the vicinity of the former oil burner did not identify USTs or UST excavations. Therefore, the former oil burner does not represent a REC at the subject property.
- A metal plate was observed on the floor of the warehouse on tax lot 8200. According to previous reports, the metal plate covers a capped floor drain that may be connected to the municipal sanitary system, and the drain has not been used since Streimer owned the subject property. We did not observe staining or chemical storage in the vicinity of the capped floor drain. The capped floor drain is likely the interior catch basin identified in previous investigations at the subject property; based on previous sampling results, the interior catch basin does not represent a REC at the subject property.

CONCLUSIONS

This Phase I ESA was conducted in conformance with the standards and practices for AAI specified in 40 CFR Part 312 and ASTM E1527-21. Any exceptions to or deviations from this practice are described in Section 1.2 (Scope of Services) and Section 10.0 (Limitations). Based on limitations of the inquiry and assessment described in the report and available subject property information, this Phase I ESA has revealed the following RECs and CRECs at the subject property:

- An asbestos factory historically located at the subject property and the presence of asbestos in soil at the subject property represents a REC.
- The subject property is listed on the ECSI database under First Class Dry Cleaner (ECSI No. 6582). The active ECSI listing represents a REC at the subject property.
- Soil gas at the subject property containing PCE, TCE, benzene, and 1,3-butadiene at concentrations greater than DEQ RBCs, likely from the adjoining Tarr Inc. and Campbell Dry Cleaner sites, represents a REC at the subject property.
- The delineated residual soil contamination associated with LUST File No. 26-95-0131 on tax lot 7500 represents a CREC at the subject property.
- The delineated residual soil contamination associated with LUST File No. 26-08-0191 on tax lot 7900 represents a CREC at the subject property.

Based on the presence of contaminants in soil gas at concentrations greater than applicable DEQ RBCs, future structures in the impacted portions of the subject property will require appropriate vapor mitigation measures if ground floor occupancy is anticipated. In addition, the extent of asbestos in soil in the vicinity of the former asbestos factory should be delineated. During future redevelopment, appropriate worker-protection measures, including extensive dust control, will be required if excavations are conducted in areas of asbestos-containing soil. Asbestos-containing soil will require disposal as special waste, possibly at the Chemical Waste Management facility in Arlington, Oregon.

Based on the presence of contaminants in soil gas, asbestos-containing soil, and an open ECSI file, the subject property should engage with DEQ for regulatory oversight prior to site redevelopment.

Prior to redevelopment, a Soil Management Plan should be prepared for the subject property to guide the future earthwork contractor in the proper identification, handling, and disposal of impacted soil at the subject property, including employing appropriate worker protections during potential earthwork in the areas of soil containing asbestos.

Although not RECs, the results of this Phase I ESA identified the following environmental concerns at the subject property:

- Staining observed on the asphalt near several drums located east of the upper HVAC shop represents a de minimis condition at the subject property.
- Previous subsurface investigations at the subject property identified fill material containing debris, including wood, porcelain, and red brick. In addition, select soil samples collected from fill material at the subject property during previous investigations contained metals at concentrations greater than DEQ CFSLs. Fill material containing debris and/or contaminants at concentrations greater than DEQ CFSLs does not qualify as clean fill and should be disposed of at a RCRA Subtitle D landfill.
- If future use is not anticipated, the drums and small-quantity containers of hazardous substances should be removed from the subject property prior to redevelopment and properly disposed of.
- Based on the ages of the subject property structures, there is potential for ACM and/or LBP to be present. Prior to potential future demolition, surveys for ACM and LBP should be completed. If ACM and/or LBP are found, the materials should be abated by a licensed abatement contractor and disposed of in conformance with applicable rules and regulations.

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ABBREVIATIONS AND ACRONYMS

AAI	all appropriate inquiries
ACM	asbestos-containing material(s)
AST	aboveground storage tank
ASTM	ASTM International
AUL	activity and use limitation
BGS	below ground surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CFSL	clean fill screening level
COPC	chemical of potential concern or contaminant of potential concern
CREC	controlled recognized environmental condition
DEQ	Oregon Department of Environmental Quality
ECSI	Environmental Cleanup Site Information
EPA	U.S. Environmental Protection Agency
ERIS	Environmental Risk Information Services
ESA	environmental site assessment
FINDS/FRS	Facility Registry Service/Facility Index
HOT	heating oil tank
HREC	historical recognized environmental condition
HSIS	Hazardous Substance Information System
HVAC	heating, ventilation, and air conditioning
kg	kilogram(s)
LBP	lead-based paint
LOF	Locality of Facility
LUST	Leaking Underground Storage Tank
MSL	mean sea level
NFA	No Further Action
not detected	compound not detected at a concentration equal to or greater than the laboratory method reporting limit or reporting detection limit
OWRD	Oregon Water Resources Department
PAH	polycyclic aromatic hydrocarbon
PBOT	Portland Bureau of Transportation
PCB	polychlorinated biphenyl
PCE	tetrachloroethene
RBC	risk-based concentration
RCRA	Resource Conservation and Recovery Act
RCRAInfo	Resource Conservation and Recovery Act Information
REC	recognized environmental condition
ROD	Record of Decision
ROW	right-of-way
SWF/LF	Solid Waste Facilities/Landfill
TCE	trichloroethene
USDA	U.S. Department of Agriculture

USGS	U.S. Geological Survey
UST	underground storage tank
VCP	Voluntary Cleanup Program
VOC	volatile organic compound
VSQG	very small quantity generator

PHASE I ENVIRONMENTAL SITE ASSESSMENT
ALBINA CAMPUS
PORTLAND, OREGON

1.0 INTRODUCTION

Columbia West was retained by Project^, the user of this report, to conduct a Phase I ESA of the Albina Campus (subject property), generally located within the two city blocks bounded by North Knott Street, North Mississippi Avenue, North Russell Street, and North Borthwick Avenue in Portland, Oregon. The subject property also includes two smaller areas on the north and east sides of North Knott Street and North Borthwick Avenue, respectively. The subject property includes tax lots 2000, 2300, 2500, 2600, 2700, 2800, 2900, 3300, 3400, 3500, 7100, 7200, 7300, 7400, 7500, 7900, 8000, and 8200 of Multnomah County tax map 1N1E27BD and encompasses 3.17 acres. The subject property is currently developed with several commercial buildings occupied by Streimer Sheet Metal Works (Streimer), materials storage yards, and parking lots. The subject property is shown relative to surrounding physical features on Figure 1. This report summarizes our Phase I ESA activities and presents results and conclusions.

Abbreviations and acronyms used herein are defined immediately following the Table of Contents.

1.1 PURPOSE

The purpose of this Phase I ESA is to identify and evaluate, to the extent feasible, environmental conditions, releases, and/or threatened releases resulting from current or past activities that have affected or may cause adverse environmental impacts to the subject property. The Phase I ESA may permit a 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. The Phase I ESA was conducted in conformance with the standards and practices for AAI as specified in Title 40, Chapter I of CFR Part 312 (40 CFR Part 312). AAI is the process of evaluating a property's environmental conditions, which may be relevant to assessing potential liability for any contamination. These standards and practices do not require the identification of hazardous substances and/or petroleum products that are generally not considered a threat to human health or the environment due to their small quantity.

In addition, this Phase I ESA was conducted to identify RECs in connection with a property as they pertain to ASTM E1527-21, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. This practice is intended for use by parties who wish to assess the environmental condition of a property by taking into account commonly known and reasonably ascertainable information. Although conformance with ASTM E1527-21 constitutes AAI as described above, the standard is intended primarily as an approach to identify RECs in connection with a property.

A REC is defined in ASTM E1527-21 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. RECs do not include de minimis conditions that do not generally present a risk to public health or the environment and would not be the subject of legal enforcement if brought to the attention of appropriate governmental agencies.

A CREC is defined by ASTM E1527-21 as a REC affecting the subject property that has been addressed to the satisfaction of the regulatory authority or authorities, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. Examples of required controls include property use restrictions, AULs, institutional controls, and engineering controls. A condition considered by the environmental professional to be a CREC is considered a REC.

An HREC is defined by ASTM E1527-21 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 authorities without subjecting the property to any required controls such as property use restrictions, AULs, institutional controls, and engineering controls. An HREC is not considered a REC. Before calling the past release an HREC, the environmental professional must determine whether the past release is a REC at the time the Phase I ESA is conducted (for example, if there has been a change in regulatory criteria). If the environmental professional considers the past release to be a REC, such as not meeting regulatory standards for unrestricted use in place at the time the Phase I ESA is conducted, the condition shall be considered a REC.

1.2 SCOPE OF SERVICES

The scope of services for this project was conducted in conformance with the standards and practices for AAI specified in 40 CFR Part 312 and the scope and limitations of ASTM E1527-21. The specific scope of services performed included the following:

- Reviewed a current USGS topographic map to identify the physical setting of the subject property.
- Reviewed federal, tribal, state, and local environmental records for listings of known or suspected environmental conditions at the subject property or nearby properties as specified in 40 CFR Part 312 and ASTM E1527-21.
- Reviewed reasonably ascertainable standard historical sources, including aerial photographs, USGS topographic maps, reverse city directories, fire insurance maps, online property information (including available building department records, property tax information, and zoning/land use records), and other historical sources, as appropriate, to identify development history on and adjoining the subject property relative to the possible use, generation, storage, release, or disposal of hazardous substances.
- Interviewed the current owner of the subject property and a state government official regarding their knowledge of the subject property.

- Conducted a visual reconnaissance of the subject property and adjoining properties to obtain information indicating the likelihood of identifying RECs concerning the subject property.
- Prepared this report that presents our findings and provides conclusions and recommendations.

The scope of services was limited to only the items listed above. This project did not include completion of an environmental compliance audit; an evaluation for the presence of PCBs in light ballasts; a survey for asbestos, lead-based paint, radon gas, toxic mold, biological pollutants, or urea-formaldehyde insulation; or a wetlands determination or delineation. This report is subject to the limitations expressed in Section 10.0 (Limitations).

1.3 VIABILITY OF A PHASE I ESA

Phase I ESAs have a limited viability as specified in ASTM E1527-21. According to ASTM 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 and from the first date of information collected for the assessment. The Phase I ESA may be updated within one year of the initial assessment. After one year, a new Phase I ESA must be completed in order to qualify for the landowner liability protections under CERCLA. The dates of information collected during this Phase I ESA are as follows:

- Review of federal, tribal, state, and local government records: July 4, 2025
- Site reconnaissance of the subject property and adjoining properties: July 14, 2025
- Earliest interview with owner, occupant, and/or government official: July 16, 2025
- Declaration by the Environmental Professional responsible for this Phase I ESA: July 23, 2025

Based on the date of the first data collected (July 4, 2025), this Phase I ESA report is considered valid through December 31, 2025.

2.0 SUBJECT PROPERTY AND VICINITY DESCRIPTION

Information concerning the physical setting of the subject property and vicinity is based on a review of the USGS 7.5-minute and 15-minute Portland, Oregon, topographic quadrangle maps; information provided by ERIS of Austin, Texas; and observations made during a site reconnaissance conducted on July 14, 2025.

As shown on Figure 2, the subject property encompasses 3.17 acres generally located within the two city blocks bounded by North Knott Street, North Mississippi Avenue, North Russell Street, and North Borthwick Avenue in Portland, Oregon. The subject property also includes two smaller areas on the north and east sides of North Knott Street and North Borthwick Avenue, respectively. Area detail maps are shown on Figure 3 through 6. The subject property is currently developed with several commercial buildings occupied by Streimer, materials storage yards, and parking lots. The approximate latitude and longitude coordinates are 45.54171, -122.67493. The subject property includes tax lots 2000, 2300, 2500, 2600, 2700, 2800, 2900, 3300, 3400, 3500, 7100, 7200, 7300, 7400, 7500, 7900, 8000, and 8200 in the southeast quarter of the northwest quarter

of Section 27, Township 1 North, Range 1 East of the Willamette Meridian. A summary of subject property tax lots, corresponding addresses, acreage, and associated development is presented in the table below:

Tax Lot	Address	Acreage	Development
2000	No situs address	0.04	Paved parking/storage area
2300	No situs address	0.10	Gravel-covered parking/storage area
2500	703 North Russell Street	0.11	Storage building with paved parking/storage area
2600	717 North Russell Street	0.34	Cutting/welding shop and paved parking/storage areas
2700	731 – 753 North Russell Street	0.34	Paved and gravel-covered parking/storage areas
2800	731 North Russell Street	0.10	Paved parking/storage area
2900	740 North Knott Street	0.84	Upper HVAC shop and paved parking/storage areas
3300	No situs address	0.04	Paved parking area
3400	739 North Knott Street	0.03	Paved parking area
3500	No situs address	0.03	Paved parking area
7100	2651 North Albina Avenue	0.21	Office building with paved parking area
7200	2651 North Albina Avenue	0.06	Gravel-covered parking/storage area
7300	2651 North Albina Avenue	0.06	Gravel-covered parking/storage area
7400	2631 North Albina Avenue	0.07	Storage building with paved and gravel-covered area
7500	2621 North Albina Avenue	0.14	Paved and gravel-covered parking/storage area
7900	829 North Russell Street	0.20	Shop building with paved and gravel-covered parking/storage areas
8000	No situs address	0.11	Paved parking/storage area
8200	2630 North Mississippi Avenue	0.41	Warehouse building with paved parking/storage areas

According to Multnomah County taxation and assessment information, tax lots 2300, 2500, 2700, 2800, 3300, 3400, 7100, 7200, 7300, 7400, and 7500 are owned by McClanahan, Carrie L & Fast, Brenda S Et Al; tax lots 2600, 7900, 8000, and 8200 are owned by Streimer Sheet Metal Works Inc; tax lot 2000 is owned by Gen-3 Leasing LLC; tax lot 2900 is owned by Tri-S Group LLC; and tax lot 3500 is owned by Frederick L Streimer 2012 Irrevocable Trust Et Al.

The subject property is situated at elevations between approximately 65 and 90 feet above MSL. The topography of the subject property slopes slightly downward to the southwest.

Land use in the vicinity of the subject property is primarily commercial, industrial, and residential. According to the City of Portland, the subject property is zoned Central Employment (EX) and General Industrial 1 (IG1).

2.1 GEOLOGIC SETTING

The subject property lies within the Willamette Valley/Puget Sound Lowland, a wide physiographic depression flanked by the mountainous Coast Range on the west and the Cascade Range on the east. Inclined or uplifted structural zones within the Willamette Valley/Puget Sound Lowland constitute highland areas, and depressed structural zones form sediment-filled basins. The subject property is located in the central portion of the Portland/Vancouver Basin, an open, somewhat elliptical, northwest-trending syncline approximately 60 miles wide.

According to the *Geologic Map of the Greater Portland Metropolitan Area and Surrounding Region, Oregon and Washington, Oregon*, the near-surface soil is expected to consist of Pleistocene-aged unconsolidated, stratified clay, silt, sand, and gravel deposits derived from catastrophic outburst floods of Glacial Lake Missoula (Qf; Wells et al. 2020).

The Web Soil Survey maps the surface soil at the subject property as urban land, 0 to 3 percent slopes (USDA 2025). Urban land is categorized as a miscellaneous area.

2.2 GROUNDWATER

Based on our experience in the area and a review of OWRD well logs, previous subsurface investigations, and topographic maps, groundwater is expected to be present at depths between approximately 50 and 60 feet BGS and is anticipated to flow southwest toward the Willamette River. Groundwater conditions at the subject property are expected to vary seasonally due to precipitation and other factors, and perched groundwater may be present in localized areas.

3.0 USER-PROVIDED INFORMATION

The performance of this Phase I ESA is only one component of the process required to satisfy the AAI Rule. The user also must adhere to a set of user responsibilities as defined by the ASTM E1527-21 Standard and the AAI Rule. A user seeking protection from CERCLA liability as an innocent landowner, bona fide prospective purchaser, or contiguous property owner must complete all components of the AAI process in addition to meeting any ongoing obligations. AAI components, CERCLA liability relief, and ongoing obligations are discussed in the AAI Rule and in Appendix XI of the ASTM E1527-21 Standard.

The AAI Rule requires that the user of the report consider the following:

- Whether the user has specialized knowledge regarding previous ownership or uses of the subject property that may be material to identifying RECs
- Whether the user has determined that the subject property's title contains environmental liens or other information related to the environmental condition of the subject property, including engineering and institutional controls and AULs, as defined by the ASTM E1527-21 Standard
- Whether the user is aware of commonly known or reasonably ascertainable information regarding the subject property, including whether or not the presence of contamination is likely on the subject property and to what degree it can be detected
- Whether the user has prior knowledge that the price of the subject property has been reduced for environmentally related reasons

Columbia West provided a user questionnaire to Tom Cody, real estate partner with Project^, on June 23, 2025. Mr. Cody stated that liens, AULs, or institutional or engineering controls were not identified for the subject property. Mr. Cody indicated that an old Sanborn map identified an asbestos factory historically located on the subject property, but he was not aware of any specific spills or releases of hazardous substances at the subject property. Mr. Cody noted that the seller provided some information regarding previous environmental investigations that have taken places at the subject property, as discussed in Section 4.0 (Previous Reports).

4.0 PREVIOUS REPORTS

Columbia West was provided with several previously completed environmental reports for the subject property. The previous reports are discussed in the following sections and presented in Appendix A.

4.1 NV5 (AUGUST 11, 2022)

NV5 prepared a Phase I ESA of tax lots 2000 and 2300, referred to as the Borthwick Site, dated August 11, 2022. At the time of the Phase I ESA, the Borthwick Site consisted of two materials storage yards. The Phase I ESA did not identify RECs at the Borthwick Site, but noted that undocumented fill and historical heating oil USTs and/or septic systems associated with former residences may be present in this portion of the subject property.

4.2 NV5 (AUGUST 15, 2022)

NV5 prepared a Phase I ESA of tax lots 3300, 3400, and 3500, referred to as the 739 N Knott Site, dated August 15, 2022. At the time of the Phase I ESA, the 739 N Knott Site consisted of a gravel parking lot. The Phase I ESA did not identify RECs at the 739 N Knott Site, but noted that soil in urban areas frequently contains contaminants at concentrations greater than DEQ CFSLs. The Phase I ESA also identified potential historical heating oil USTs and/or septic systems associated with former residences on the 739 N Knott Site may be present in this portion of the subject property.

4.3 NV5 (AUGUST 19, 2022)

NV5 prepared a Phase I ESA of tax lots 7100, 7200, 7300, 7400, 7500, 7900, 8000, and 8200 of the subject property, referred to as the 829 N Russell Site, dated August 19, 2022. At the time of the Phase I ESA, the 829 N Russell Site consisted of four single-story buildings and paved and gravel parking areas occupied by Streimer. The Phase I ESA identified the following RECs in this portion of the subject property:

- LUST File No. 26-08-0191 is associated with a former heating oil UST located on tax lot 7900. LUST File No. 26-08-0191 received an NFA determination from DEQ on July 25, 2008. However, petroleum-impacted soil remains on tax lot 7900 at concentrations greater than DEQ RBCs. Therefore, NV5 identified LUST File No. 26-08-0191 as a CREC at the subject property, which also represented a REC in this portion of the subject property.
- LUST File No. 26-95-0131 is associated with a former heating oil UST located on tax lot 7500. LUST File No. 26-95-0131 received an NFA determination from DEQ on February 26, 2008. However, petroleum-impacted soil remains on tax lot 7500 at concentrations greater than DEQ RBCs, and the analytical method used to analyze soil

samples at the time is no longer a recognized analytical method for petroleum hydrocarbons. Therefore, NV5 identified LUST File No. 26-95-0131 as a REC in this portion of the subject property.

- The former Campbell Dry Cleaner (ECSI No. 5680) operated on an adjoining property from approximately 1952 through 1996. In 2014, chloroform, PCE, and TCE were detected at concentrations greater than DEQ RBCs in groundwater and soil gas samples collected from the 829 N Russell Site. In 2016, DEQ issued a partial NFA determination for ECSI No. 5680 that applied only to the former dry cleaner site and did not apply to off-site properties. NV5 identified on-site impacts from ECSI No. 5680 as a REC in this portion of the subject property.
- The Tarr Inc. site (ECSI No. 1139) is located approximately 220 feet southeast of the 829 N Russell Site. The Tarr Inc. site was listed on the ECSI database because of the presence of VOCs and petroleum hydrocarbons in soil, soil vapor, and groundwater. Remediation and monitoring efforts are ongoing, and the south portion of the 829 N Russell Site is located within the LOF of the Tarr Inc. site. NV5 identified ECSI No. 1139 as a REC in this portion of the subject property.
- An asbestos factory was located on tax lot 7400 from at least 1924 through 1936. Due to the potential for a release of asbestos fibers to soil, NV5 identified the former asbestos factory as a REC in this portion of the subject property.
- A clothes cleaning facility, which may have included dry cleaning operations, was historically present on tax lot 7900. NV5 identified the former clothes cleaning facility as a REC in this portion of the subject property.
- An oil burner was historically located on tax lot 8000. Due to a lack of decommissioning records, the likely presence of a heating oil UST associated with the historical oil burner on tax lot 8000 was identified as a REC in this portion of the subject property.

4.4 NV5 (AUGUST 25, 2022)

NV5 prepared a Phase I ESA of tax lots 2500, 2600, 2700, 2800, and 2900 of the subject property, referred to as the Block 9 Site, dated August 25, 2022. At the time of the Phase I ESA, the Block 9 Site consisted of four buildings with paved parking and storage areas occupied by Streimer. The Phase I ESA identified the following RECs in this portion of the subject property:

- A 1,000-gallon gasoline UST was decommissioned by removal from tax lot 2900 in 1989. The UST was formerly located beneath the east portion of the upper HVAC shop. It does not appear that confirmation soil samples were collected from the UST cavity during decommissioning. Therefore, NV5 identified the former gasoline UST as a REC in this portion of the subject property.
- The southwest portions of tax lots 2700 and 2800 were historically occupied by auto repair facilities. Releases of auto repair-related chemicals or wastes may have occurred, or undocumented USTs may be present in the area of the former repair shops. NV5 identified the former on-site auto repair facilities as a REC in this portion of the subject property.
- First Class Dry Cleaner operated on tax lot 2700 from at least 1950 through 1975. Potential undocumented releases of dry cleaning-related constituents may have occurred during its historical operations. NV5 identified the former on-site dry cleaning facility as a REC in this portion of the subject property.

- The Tarr Inc. site (ECSI No. 1139) is located approximately 220 feet southeast of the 829 N Russell Site. The Tarr Inc. site was listed on the ECSI database because of the presence of VOCs and petroleum hydrocarbons in soil, soil vapor, and groundwater. Remediation and monitoring efforts are ongoing, and the south portion of the Block 9 Site is located within the LOF of the Tarr Inc. site. NV5 identified ECSI No. 1139 as a REC in this portion of the subject property.

4.5 NV5 (FEBRUARY 2, 2023)

NV5 conducted a Phase II ESA of the Block 9 Site in February 2023. The Phase II ESA included conducting a geophysical survey in the areas of the historical auto repair shops on tax lots 2700 and 2800 to evaluate for the presence of USTs, UST cavities, or other subsurface features; advancing six direct-push borings (DP-1 through DP-6) in the former auto repair shop areas and the former First Class Dry Cleaner on tax lot 2700; collecting four soil gas samples (SG-1 through SG-4) from the vicinity of the former First Class Dry Cleaner area; collecting a soil gas sample from an existing on-site vapor probe (VP-13) associated with the Tarr Inc. site; and collecting a sub-slab vapor sample (SSV-1) from the vicinity of the former gasoline UST on tax lot 2900. The exploration locations for the Phase II ESA of the Block 9 Site are shown on Figure 4.

The geophysical survey identified a potential UST and a potential UST excavation on tax lot 2700 and an irregularly shaped pit containing ferric debris on tax lot 2800. Several direct-push borings encountered fill material, including debris such as wood, porcelain, and red brick. Antimony and lead were detected at concentrations greater than DEQ CFSLs in one soil sample collected from fill material. Gasoline-range hydrocarbons and VOCs were not detected in the soil gas or sub-slab vapor samples at concentrations greater than the occupational DEQ RBCs established at the time.

Since the date of the 2023 Phase II ESA, DEQ revised many of its vapor intrusion RBCs. The concentrations of benzene and 1,3-butadiene detected in soil gas sample SG-1 exceed the current DEQ *Vapor Intrusion into Buildings* chronic RBCs for residential and commercial receptors, which represents a REC at the subject property. However, contaminants typically released by dry cleaners, such as PCE and TCE, were not detected in soil gas sample SG-1 at concentrations greater than the most conservative DEQ RBCs. Benzene and 1,3-butadiene are more commonly associated with petroleum releases, and soil gas sample SG-1 is located within the LOF of the release from the adjoining Tarr Inc. site (ECSI No. 1139). In addition, the detected concentration of PCE in vapor probe VP-13 exceeds the current DEQ *Vapor Intrusion into Buildings* chronic RBC for residential receptors. Vapor probe VP-13 is also located within the Tarr Inc. LOF and is used to monitor the known soil gas impacts from the Tarr Inc. site. As discussed in Section 7.2.1. (Tarr Inc.), the Tarr Inc. site represents a REC at the subject property.

Based on the results of the 2023 Phase II ESA, the former auto repair shops on tax lots 2700 and 2800 and the former gasoline UST on tax lot 2900 are no longer considered RECs at the subject property. While the Phase II ESA did not identify soil or soil gas impacted with contaminants typically associated with dry cleaning operations in the vicinity of the former First Class Dry Cleaner, subsequent to the February 2023 Phase II ESA the former First Class Dry Cleaner was listed on the DEQ ECSI database (ECSI No. 6582, discussed further in Section 7.1.4 [DEQ ECSI Database]). The open regulatory file associated with ECSI No. 6582 represents a REC at the subject property.

4.6 NV5 (FEBRUARY 8, 2023)

NV5 conducted a Phase II ESA of the 829 N Russell Site in February 2023. The Phase II ESA included conducting a geophysical survey of tax lot 8000 and in the vicinity of the former heating oil UST on tax lot 7500 to evaluate for the presence of USTs or UST cavities and advancing 14 direct-push borings at the 829 N Russell Site, including eight borings (DP-1 through DP-8) in the vicinity of the former asbestos factory on tax lot 7400, two borings (DP-9 and DP-10) in the vicinity of the former heating oil UST on tax lot 7500, one boring (DP-11) at the location of the potential former on-site dry cleaning facility on tax lot 7900, one boring (DP-12) adjacent to an interior catch basin on tax lot 8200, and two borings (DP-13 and DP-14) in the vicinity of the potential heating oil UST on tax lot 8000. The Phase II ESA also included collecting four soil gas samples (SG-1 through SG-4) from the vicinity of the potential former on-site dry cleaning facility. The exploration locations for the Phase II ESA of the 829 N Russell Site are shown on Figure 3.

The geophysical survey identified a backfilled excavation on tax lot 7500 at the approximate reported location of the former heating oil UST associated with LUST File No. 26-95-0131 and an apparent decommissioned-in-place heating oil UST on tax lot 7900 associated with LUST File No. 26-09-0191. The geophysical survey did not identify a UST or UST excavation near the former oil burner on tax lot 8000. Diesel- and oil-range hydrocarbons, PAHs, and PCBs were either not detected or were detected at concentrations less than occupational DEQ RBCs in the soil samples collected from the 829 N Russell Site.

Several metals were detected at concentrations greater than DEQ CFSLs in fill material encountered in the borings. PCE and TCE were not detected at concentrations greater than occupational DEQ RBCs in the soil sample collected from boring DP-11. Gasoline-range hydrocarbons and VOCs were either not detected or were detected at concentrations less than occupational DEQ RBCs in soil gas samples SG-1 through SG-4. Asbestos was detected in soil samples collected from borings DP-1 through DP-4 and DP-7. Asbestos was not detected in soil samples collected from borings DP-5, DP-6, and DP-8.

NV5 recommended preparing a Soil Management Plan prior to redevelopment of the subject property and noted that appropriate worker protections should be employed during potential earthwork in the areas of soil containing asbestos. NV5 also recommended delineating the vertical and horizontal extents of soil containing asbestos in the vicinity of tax lot 7400 and recommended enrolling the property into the DEQ VCP if regulatory closure was desired.

Soil samples collected at the 829 N Russell Site were compared to the applicable DEQ RBCs established at the time of the investigation for occupational use. It is our understanding that future redevelopment at the subject property may include residential use. Therefore, we have compared the historical soil sampling results to the current RBCs for both residential and occupational receptors. Soil sample DP-11(2-3) collected on tax lot 7900 contains lead at a concentration greater than the DEQ *Soil Ingestion, Dermal Contact, and Inhalation* RBC for residential receptors, representing a REC at the subject property.

In addition, since the date of this investigation, DEQ has updated many of its vapor intrusion RBCs. The detected concentrations of PCE and TCE in soil gas samples SG-1 and SG-3 did not contain VOCs at concentrations greater than the occupational DEQ RBCs established at the time, but now exceed the current DEQ *Vapor Intrusion into Buildings* chronic and/or acute RBCs for residential and/or commercial receptors. Soil gas samples SG-1 and SG-3 were collected in the vicinity of potential dry cleaning business located on tax lot 7900. The Former Campbell Dry Cleaner site, from which impacted soil gas is known to extend onto the subject property, is located adjacent east of the soil gas samples collected. The presence of PCE and TCE in soil gas on tax lot 7900 at concentrations greater than DEQ *Vapor Intrusion into Buildings* RBCs represents a REC at the subject property.

Based on the results of this Phase II ESA, the former oil burner on tax lot 8000 does not represent a REC at the subject property. The presence of asbestos in soil in the vicinity of the former asbestos factory represents a REC at the subject property.

4.7 NV5 (JUNE 2023)

NV5 conducted additional soil characterization of the former asbestos factory in June 2023. The additional soil characterization included advancing nine direct-push borings (DP-15 through DP-23) in the vicinity of the former asbestos factory to a depth of 5 feet BGS and analyzing soil samples for asbestos. Asbestos was detected in 6 out of 18 samples collected from depths between 0 and 2 feet BGS. Of those six soil samples, five of the soil samples were collected between 0 feet and 1 foot BGS and one soil sample [DP-22(1-2)] was collected from between 1 foot and 2 feet BGS.

NV5 recommended preparing a Soil Management Plan prior to redevelopment of the subject property and noted that appropriate worker protections should be employed during potential earthwork in the areas of soil containing asbestos. NV5 also noted that further delineation of asbestos-impacted soil should be conducted prior to potential redevelopment. The presence of asbestos in soil at the subject property represents a REC.

4.8 K&S ENVIRONMENTAL, INC. (2023)

K&S Environmental, Inc. decommissioned a heating oil UST from the subject property and prepared a decommissioning report dated December 1, 2023. The heating oil UST appeared to be the potential UST identified on tax lot 2700 during NV5's geophysical survey (see Section 4.5 [NV5 (February 2, 2023)]). The empty, 340-gallon heating oil UST was removed following demolition of a former tool storage warehouse on tax lot 2700. Diesel-range hydrocarbons were not detected in confirmation soil samples collected from beneath the heating oil UST, and DEQ registered the closure certification on March 13, 2024. Based on the confirmation soil sample analytical results and the closure certification, the former heating oil UST does not represent a REC at the subject property.

5.0 SITE RECONNAISSANCE

Caroline Siegel of Columbia West conducted a reconnaissance of the subject property on July 14, 2025. The observations described in this section apply to the subject property as it appeared on that day. The site reconnaissance was performed to observe the current condition of the subject property and obtain information indicating the likelihood of identifying RECs in connection with

the subject property. Access to the subject property was unlimited. The adjoining properties were also observed from the boundaries of the subject property as part of the site reconnaissance. A site plan is presented on Figure 2. Photographs of the subject property were taken to document observations made during the site reconnaissance and are presented in Appendix B.

5.1 GENERAL SUBJECT PROPERTY USE

At the time of our site reconnaissance, the subject property was used by Streimer for accounting offices, records storage, materials storage, and parking.

5.2 STORMWATER/WASTEWATER

Surface water at the subject property is expected to infiltrate into the ground surface, flow into catch basins throughout the subject property, or flow into catch basins located in adjoining ROWs. These catch basins reportedly discharge to the municipal storm sewer system. Surface water was not observed at the subject property at the time of the site reconnaissance. Except for sewage, wastewater generation was not observed at the subject property.

5.3 OTHER SUBJECT PROPERTY OBSERVATIONS

The table below summarizes items that were observed and/or reported at the subject property during the site reconnaissance. If items were observed or reported, they are discussed further below the table.

Description	Observed or Reported at the Time of the Site Reconnaissance
Structures	See Section 5.3.1
Roads	See Section 5.3.2
Potable Water Supply	See Section 5.3.3
Sewage Disposal System	See Section 5.3.4
Hazardous Substances/Petroleum Products	See Section 5.3.5
USTs/ASTs	See Section 5.3.6
Odors	Not observed or reported
Standing Water or Sumps	Not observed or reported
Drums/Totes/Bulk Containers	See Section 5.3.7
Potential PCB-Containing Equipment	See Section 5.3.8
Heating/Cooling Systems	See Section 5.3.9
Interior Stains/Corrosion	See Section 5.3.10
Interior Drains and Sumps	See Section 5.3.11
Pits, Ponds, or Lagoons	Not observed or reported
Stained Soil or Pavement	See Section 5.3.12
Stressed Vegetation	Not observed or reported
Solid Waste/Fill Material	See Section 5.3.13
Wells	Not observed or reported
Historical Septic Systems/Cesspools	Not observed or reported

5.3.1 Structures

The following structures were observed at the subject property:

- The office building on tax lot 7100 consists of a one-story, slab-on-grade commercial building encompassing approximately 4,000 square feet constructed in 1948. This building is currently used for accounting offices and records storage.
- The storage building on tax lot 7400 consists of a one-story, slab-on-grade commercial building encompassing approximately 1,440 square feet constructed in 1948. This building is currently used for automotive materials storage.
- The shop building on tax lot 7900 consists of a one-story commercial building encompassing approximately 3,284 square feet constructed in 1952. The office portion of the building consists of a slab-on-grade foundation and the floor of the shop is paved asphalt. The office portion of the building is vacant and the shop portion is used for materials storage.
- The warehouse on tax lot 8200 consists of a one-story, slab-on-grade commercial building with a mezzanine level encompassing approximately 16,648 square feet constructed in 1969. The building is currently mostly vacant with some materials storage.
- The storage building on tax lot 2500 consists of a two-story commercial building with a basement encompassing approximately 6,400 square feet constructed in 1912. This building is currently used for materials storage.
- The cutting/welding shop on tax lot 2600 consists of a one-story, slab-on-grade commercial building with a mezzanine level encompassing approximately 6,000 square feet constructed in 1971. The building is currently vacant.
- The upper HVAC shop on tax lot 2900 consists of a one-story, slab-on-grade commercial building with partial second and third floors. The building was constructed in sections from 1956 through the late 1990s and encompasses approximately 22,000 square feet. The building is currently mostly vacant with some materials storage and offices.

A tool storage warehouse was historically located on tax lot 2700 and consisted of a two-story structure with a basement encompassing approximately 14,166 square feet constructed sometime prior to 1924. The tool storage warehouse was demolished sometime between 2022 and 2024.

5.3.2 Roads

The subject property is adjoined by North Mississippi Avenue, North Knott Street, North Russell Street, North Albina Avenue, and North Borthwick Avenue. Paved and gravel parking and storage areas are present on multiple portions of the subject property. Evidence of spills or waste disposal was not observed in the vicinity of the parking and storage areas or the adjoining ROWs.

5.3.3 Potable Water Supply

Potable water is supplied to the subject property by the City of Portland.

5.3.4 Sewage Disposal System

Sewage generated at the subject property is discharged to the City of Portland municipal sewer system. According to the City of Portland, structures at the subject property were connected to the municipal sewer system in 1912 and 1932.

5.3.5 Hazardous Substances and Petroleum Products

Several small-quantity containers of diesel, gasoline, coolant, and motor oil and a 55-gallon drum of hydraulic fluid were observed in the storage building on tax lot 7400. Evidence of spills or leaks was not observed in the vicinity of these containers.

An aboveground hydraulic fluid reservoir associated with a hydraulic elevator was observed in the upper HVAC shop on tax lot 2900. We did not observe evidence of leaks from the hydraulic fluid reservoir.

Four 55-gallon drums were observed immediately east of the upper HVAC shop. One of the drums was labeled as "used cutting fluid" and the other three drums were unlabeled. Each of the drums were partially full. Some minor surface staining was observed on the asphalt near these drums. We did not observe any significant cracks or holes in the asphalt near the drums, and the staining represents a de minimis condition at the subject property.

5.3.6 USTs/ASTs

We observed a vent pipe on the west side of the shop building on tax lot 7900. The vent pipe appears to be associated with the decommissioned-in-place 675-gallon heating oil UST associated with LUST File No. 26-08-0191.

5.3.7 Drums/Totes/Bulk Containers

Except for the drums of petroleum products discussed in Section 5.3.5 (Hazardous Substances and Petroleum Products), drums were not observed on the subject property. Totes and/or bulk containers were not observed on the subject property.

5.3.8 Potential PCB-Containing Equipment

Three pole-mounted transformers were observed at the northwest of the corner tax lot 8200, one pole-mounted transformer was observed at the southwest corner of tax lot 8000, and five pole-mounted transformers were observed north of tax lot 2900. Labels identifying PCB content of the transformers were not observed. The transformers appeared to be in good condition with no evidence of spills or leaks.

An aboveground hydraulic fluid reservoir for a hydraulic elevator was observed in an equipment room within the upper HVAC shop. Hydraulic fluid may contain PCBs. However, we did not observe evidence of leaks from the hydraulic equipment.

5.3.9 Heating and Cooling Systems

The subject property structures are heated and/or cooled by ceiling- or roof-mounted natural gas or electric units.

5.3.10 Interior Stains/Corrosion

Some petroleum staining was observed on the concrete floor in the southeast portion of the upper HVAC shop. We did not observe cracks or holes in the concrete floor, and floor drains were not present in the vicinity of the staining. Therefore, it is our opinion that the staining represents a de minimis condition at the subject property.

5.3.11 Interior Drains and Sumps

A metal plate was observed on the floor of the warehouse on tax lot 8200. According to previous reports, the metal plate covers a capped floor drain that may be connected to the municipal sanitary system, and the drain has not been used since Streimer owned the subject property. We did not observe staining or chemical storage in the vicinity of the capped floor drain. The capped floor drain is likely the interior catch basin identified in previous investigations at the subject property (see Section 4.6 [NV5 (February 8, 2023)]).

5.3.12 Stained Soil or Pavement

Petroleum staining was observed on the asphalt in the vicinity of four 55-gallon drums located east of the upper HVAC shop. We did not observe any significant cracks or holes in the asphalt near the drums, and the staining represents a de minimis condition at the subject property.

5.3.13 Solid Waste/Fill Material

Previous subsurface investigations at the subject property identified fill material containing debris, including wood, porcelain, and red brick. In addition, select soil samples collected from fill material at the subject property during previous investigations contained metals at concentrations greater than DEQ CFSLs. While not a REC at the subject property, fill material containing debris and/or contaminants at concentrations greater than DEQ CFSLs does not qualify as clean fill and should be disposed of at a RCRA Subtitle D landfill.

5.4 ADJOINING PROPERTY USE

The subject property is noncontiguous. Portions of the subject property are directly bounded to the north by North Knott Street, Left Bank Lofts, a residence, parking lots, and Neon Distributors; to the east by the Interstate 5 overpass, a PBOT parking lot, Neon Distributors, and a Streimer Sheet Metal storage building; to the south by North Russell Street, across which are commercial buildings and vacant lots; and to the west by North Mississippi Avenue, across which are Mississippi Court Apartments, commercial buildings, and a paved parking lot. Portions of the subject property are divided from one another by North Albina Avenue, North Borthwick Avenue, and North Knott Street. Evidence of adverse environmental conditions was not observed on adjoining properties.

A potential UST vent pipe was observed on the south side of the Left Bank Lofts building located north of the west portion of the subject property across North Knott Street. Based on the inferred groundwater gradient, depth to groundwater at the subject property, and distance of the potential vent pipe across North Knott Street, the potential UST on the north adjoining property is unlikely to have impacted the subject property and does not represent a REC at the subject property.

6.0 HISTORICAL RECORDS REVIEW

Reasonably ascertainable information concerning the history and background of the subject property begins in 1885 and includes aerial photographs, USGS topographic maps, reverse city directories, fire insurance maps, online property information (including available building department records, property tax information, and zoning/land use records), and personal knowledge of individuals familiar with the subject property.

Historical aerial photographs of the subject property were obtained from ERIS and reviewed by Columbia West. The scale of the photographs reviewed allowed for the interpretation of general subject property development/configuration but did not allow for the identification of specific subject property features. Aerial photographs were reviewed for the following years: 1936, 1948, 1951, 1960, 1970, 1981, 1986, 1990, 1994, 2000, 2003, 2004, 2005, 2009, 2011, 2012, 2014, 2016, 2018, 2020, 2022, and 2024. The historical aerial photographs are presented in Appendix C.

Historical topographic maps of the subject property were obtained from ERIS and reviewed by Columbia West. Topographic maps were reviewed for the following years: 1897, 1905, 1940, 1954, 1961, 1970, 1977, 1995, 2014, 2017, and 2020. The historical topographic maps are presented in Appendix C.

Reverse city directories for the subject property and adjoining properties were obtained from ERIS and reviewed by Columbia West. The city directories were reviewed (if available) at approximately five-year intervals for the years spanning 1930 through 2024. The city directories are presented in Appendix C.

Fire insurance maps for the subject property and adjoining properties were obtained from ERIS and reviewed by Columbia West. Fire insurance maps were reviewed for the following years: 1884, 1885, 1887, 1889, 1901, 1909, 1924, 1950, and 1969. It should be noted that the 1884 fire insurance map does not show the subject property or adjoining properties, and the 1885 and 1887 fire insurance maps show only the adjoining properties. Therefore, the earliest available information regarding the subject property or adjoining properties is the 1885 fire insurance map. The fire insurance maps are presented in Appendix C.

Online property information for the subject property and select adjoining properties was reviewed by Columbia West. The online property information is presented in Appendix C.

6.1 SUBJECT PROPERTY

By 1889, the subject property was occupied by several residences, a church, and a commercial building. Throughout the 1900s, commercial and industrial use gradually increased on the subject property. Commercial and industrial occupants most notably included an asbestos factory and a potential dry cleaning business on tax lots 7400 and 7900, respectively, from at least 1924 through 1936; auto repair facilities on tax lots 2700 and 2800 from at least 1940 through 1954; and a dry cleaning facility (First Class Dry Cleaner) on tax lot 2700 from at least 1950 through 1975. Online property records indicate that heating oil USTs were installed on tax lots 7500, 7900, and 8000 between 1950 and 1952. Streimer has operated on portions of the subject property dating back to at least 1960. The last residence was removed from the subject property by 2016, at which time the subject property resembled its current configuration, with demolition of one commercial structure occupied by Streimer occurring between 2022 and 2024. At the time of the site reconnaissance, many of the subject property structures were used for storage.

6.2 SURROUNDING PROPERTIES

By 1885, the adjoining ROWs were constructed and surrounding properties generally consisted of residences with associated outbuildings and a skating rink southwest of the subject property.

Commercial use had increased on surrounding properties by 1901 and continued to increase through the 20th century. From at least 1950 through 1994, a dry cleaning facility (Campbell Dry Cleaner) operated east of tax lot 7900. By 1960, steel oil tanks and an oil loading area were present south of the subject property across North Russell Street at the location of the Tarr Inc. facility. Between 1960 and 1981, most of the surrounding residences were removed and replaced by commercial or industrial buildings and parking areas. Additional residences were removed through 2000, by which time surrounding properties generally resembled their current configuration.

7.0 ENVIRONMENTAL RECORDS REVIEW

Federal, tribal, state, and local environmental records and databases were compiled according to 40 CFR Part 312 and ASTM E1527-21 for the subject property and those facilities that currently or previously have occupied properties within the specified search distance from the subject property. Information contained in the records and databases was reviewed by Columbia West to evaluate the potential for environmental impacts to the subject property. The ERIS Database Report is presented in Appendix D.

7.1 SUBJECT PROPERTY

The subject property was listed on the EPA RCRAInfo, DEQ UST, DEQ LUST, DEQ ECSI, DEQ Tank HOT Decom, Oregon Tier 2, Oregon HSIS, and EPA FINDS/FRS databases.

7.1.1 EPA RCRAInfo Database

The EPA RCRAInfo database contains listings of sites that are known to generate hazardous waste. The subject property is listed on the RCRAInfo database as a VSQG of hazardous waste as Streimer Sheet Metal Works, Inc. VSQG's generate less than 100 kg per month of hazardous waste or less than 1 kg per month of acutely hazardous waste. There were no reported violations, and the listing does not constitute a REC at the subject property.

7.1.2 DEQ UST Database

The DEQ UST database contains a listing of sites with current or former registered USTs. The subject property is listed on the DEQ UST database as Facility ID No. 4749 due to a 1,000-gallon gasoline UST decommissioned by removal in 1989. According to Steve Streimer (owner), the UST was formerly located beneath the east portion of the upper HVAC shop on tax lot 2900. Mr. Steimer stated that an addition was added to the building following the removal of the UST. The approximate location of the former UST is shown on Figure 4. It does not appear that confirmation soil samples were collected from the UST cavity during decommissioning. However, a previous subsurface investigation (see Section 4.5 [NV5 (February 2, 2023)]) did not identify soil gas in the vicinity of the former UST as containing gasoline-range hydrocarbons or VOCs at concentrations greater than applicable DEQ RBCs. Therefore, the former 1,000-gallon UST does not represent a REC at the subject property.

7.1.3 DEQ LUST Database

The DEQ LUST database contains a listing of sites with reported leaking UST incidents. The subject property is listed on the DEQ LUST database for releases from two heating oil USTs (LUST File Nos. 26-95-0131 and 26-08-0191). LUST File No. 26-95-0131 is associated with a 500-gallon heating oil UST decommissioned by removal from tax lot 7500 in 1995. ESU, Inc. (ESU)

decommissioned the UST and collected confirmation soil samples. ESU estimated that approximately 5 to 10 cubic yards of impacted soil remained at a depth of approximately 10 to 15 feet BGS. Groundwater was reportedly not encountered in the UST excavation.

While LUST File No. 26-95-0131 received an NFA determination from DEQ in 2008, petroleum-impacted soil remains in the vicinity of this UST at concentrations greater than DEQ RBCs. In addition, the method used to analyze the confirmation soil samples (Method TPH 418.1) is no longer a recognized analytical method for petroleum hydrocarbons. A previous subsurface investigation (see Section 4.6 [NV5 (February 8, 2023)]) did not identify petroleum hydrocarbons adjacent to the UST excavation at concentrations greater than DEQ RBCs. While a pocket of soil containing elevated petroleum hydrocarbons likely remains within the former UST excavation, its extent has been delineated. Therefore, LUST File No. 26-95-0131 represents a CREC at the subject property.

LUST File No. 26-08-0191 is associated with a 675-gallon heating oil UST decommissioned in place on tax lot 7900 in 2008. Approximately 4.86 tons of petroleum-impacted soil were removed from beneath the decommissioned UST by cutting a portion out of the bottom of the UST. Following excavation, soil samples were collected to delineate the petroleum-impacted soil that would be left in place. Diesel-range hydrocarbons remained in soil at concentrations greater than DEQ RBCs. However, the full vertical and horizontal extents of the impacted soil were delineated, with an estimated volume of approximately 34 cubic yards. While LUST File No. 26-08-0191 received an NFA determination from DEQ in 2008, petroleum-impacted soil remains in the vicinity of the decommissioned-in-place UST at concentrations greater than DEQ RBCs. LUST File No. 26-08-0191 represents a CREC at the subject property.

7.1.4 DEQ ECSI Database

The DEQ ECSI database contains listings of sites known or suspected to be contaminated with hazardous substances. The subject property is listed on the ECSI database under First Class Dry Cleaner (ECSI No. 6582) and was added to the database on January 18, 2024. First Class Dry Cleaner operated on tax lot 2700 from at least 1950 through 1975. The ECSI listing contains limited information and recommends site evaluation. The active ECSI listing represents a REC at the subject property.

Previous investigations detected benzene and 1,3-butadiene in the vicinity of the former First Class Dry Cleaner at concentrations greater than the most recently updated DEQ *Vapor Intrusion into Buildings* chronic RBCs for residential and commercial receptors. However, contaminants typically released by dry cleaners, such as PCE and TCE, were not detected at concentrations greater than the most conservative DEQ RBCs. Benzene and 1,3-butadiene are more commonly associated with petroleum releases, and soil gas sample SG-1 is located within the LOF of the release from the adjoining Tarr Inc. site (ECSI No. 1139). As discussed in Section 7.2.1 (Tarr Inc.), the Tarr Inc. site represents a REC at the subject property.

7.1.5 DEQ Tank HOT Decom Database

The DEQ Tank HOT Decom database contains records of heating oil USTs that were decommissioned and evidence of a leak was not found. The subject property is listed under HOT ID 49885 due to a 340-gallon heating oil UST decommissioned by removal from tax lot 2700 on

November 30, 2023, after the former tool storage warehouse was demolished (see Section 4.8 [K&S Environmental, Inc. (2023)]). The former heating oil UST associated with HOT ID 49885 does not represent a REC at the subject property.

7.1.6 Tier 2, HSIS, and FINDS/FRS Databases

The Oregon Tier 2 and HSIS databases contain listings of facilities storing hazardous substances. The subject property is listed on the databases due to historical storage of compressed gas. The Tier 2 and HSIS listings do not indicate a release at the subject property. The EPA FINDS/FRS database is a reference database that compiles sites that are listed on other regulatory databases. The subject property's listing on the FINDS/FRS database does not indicate a release at the subject property.

7.2 SURROUNDING SITES

The ERIS Database Report identified 307 surrounding sites listed on 1 or more regulatory databases within the ASTM search distances. Based on the local topography, inferred direction of shallow groundwater flow, regulatory status of the listed sites, media impacted at the listed sites, and information contained in the regulatory databases, it is our professional opinion that 2 of the 307 sites represent a REC at the subject property. In addition, due to their proximity to the subject property, two other sites are discussed in the following sections.

7.2.1 Tarr Inc.

The Tarr Inc. site (also known as Conger Northwest, Inc.) is located at 2429 North Borthwick Avenue, adjoining the subject property to the south across North Russell Street, and cross-gradient of the subject property in the inferred groundwater flow direction. The Tarr Inc. site is listed on the DEQ ECSI database (ECSI No. 1139), DEQ LUST, EPA RCRAInfo, and DEQ VCP databases. The DEQ VCP database contains listings of sites in which responsible parties have entered into an agreement with DEQ to voluntarily address contamination associated with their property.

ECSI No. 1139 includes the majority of the block bounded by North Russell Street, North Page Street, North Borthwick Avenue, and North Albina Avenue. Chemicals including fuels, solvents, and lubricating oils were historically handled at the site. In 1990, 18 of 19 chemical storage USTs were removed from the site. The USTs contained gasoline, diesel, fuel oil, petroleum solvents, chlorinated solvents, and alcohols. Petroleum-impacted soil observed around and beneath the USTs was excavated to depths of 30 to 65 feet BGS and disposed of offsite. From 2001 through 2011, several phases of investigation were performed at the site, and Tarr Inc. entered the DEQ VCP in 2005. From 2009 through 2012, interim actions were implemented to address TCE and PCE in source areas.

A remedial investigation report was prepared by Apex in 2014. Four vapor sampling locations (VP-8, VP-13, VP-22, and VP-26), six ambient indoor air sampling locations (733-W-A, 733-B-A, 703-W-A, 717-W-A, 807-W-A, 807-B-A), and two groundwater sampling locations (MW-11 and B-60) were included in the remedial investigation data and are located on or adjoining the subject property. In 2008 and 2009, PCE and TCE were detected in vapor sample VP-8, located at the North Albina Avenue and North Russell Street intersection, and vapor sample VP-13, located on tax lot 2600, at concentrations greater than the DEQ *Vapor Intrusion into Buildings* RBC for

multiple receptors. Between 2009 and 2010, ambient air samples 733-W-A and 733-B-A were collected from the basement level of the now demolished tool storage warehouse. The ambient air samples contained PCE and TCE at concentrations greater than the DEQ *Inhalation* RBC for occupational receptors. Groundwater samples collected from boring B-60, located southeast of tax lot 7500, in 2010 contained PCE and TCE at concentrations greater than DEQ *Ingestion and Inhalation from Tapwater* RBCs.

The LOF for the Tarr Inc. site includes the south portion of the subject property and extends west to the Willamette River. Soil impacts are largely limited to the Tarr Inc. property and do not appear to have migrated to the subject property. A site plan showing the established LOF is presented in Appendix D.

DEQ issued a ROD for ECSI No. 1139 in 2017. COPCs for soil include PCE, TCE, diesel-range hydrocarbons, and benzo(a)pyrene. COPCs for soil vapor include PCE, TCE, 1,2-dichloroethane, benzene, 1,2,4-trimethylbenzene, 1,4-dioxane, chloroform, and methylene chloride. COPCs for groundwater include PCE, TCE, cis-1,2-dichloroethene, 1,1-dichloroethane, benzene, chloroform, and methylene chloride. The selected remedial action included development of a Contaminated Media Management Plan, continuing to operate an existing soil vapor extraction system, enhanced bioremediation using emulsified vegetable oil, monitored natural attenuation, compliance monitoring, permitting, institutional controls, an annual review of OWRD records, and development of a contingency plan.

DEQ issued an Order on Consent to Conger Northwest, Inc. in 2019 in accordance with the 2017 ROD. Monitoring and remediation activities in source areas are reportedly ongoing. Farallon Consulting's (Farallon) 2024 Annual Monitoring and Performance Evaluation Report dated May 9, 2025, for groundwater at the Tarr Inc. site included groundwater sampling results for monitoring well MW-11 located in the sidewalk east of tax lot 7100. TCE was not detected in monitoring well MW-11 at a concentration greater than the reporting limit on February 13, 2024. PCE was detected in the groundwater sample at a concentration less than the most conservative DEQ RBCs. Farallon is continuing to conduct in-situ groundwater remediation, including injections of Sulfidated Micro Zero-Valent Iron and PlumeStop Colloidal Biomatrix at several injection zones.

Columbia West reviewed Farallon's fourth quarter 2024 progress report dated May 9, 2025. The progress report included soil vapor and ambient air sampling results from February 2024. PCE was detected in all of the vapor sampling locations adjoining the subject property at concentrations greater than the DEQ *Vapor Intrusion into Buildings* chronic RBC for residential receptors and/or the DEQ *Inhalation* chronic RBCs for residential and commercial receptors. TCE was detected in two of the vapor sampling locations adjoining the subject property (VP-13 and VP-22) at concentrations greater than the DEQ *Inhalation* chronic RBCs for residential and commercial receptors. The February 2024 results for ambient air sampling indicated that PCE was not detected at concentrations greater than DEQ RBCs in ambient air samples collected from or adjoining the subject property. TCE was detected at concentrations greater than the DEQ *Inhalation* chronic RBC for residential receptors in two ambient indoor air samples collected from the subject property (733-W-A and 703-W-A).

Farallon has continued routine operation and maintenance of a soil vapor extraction system and sub-slab venting at the Tarr Inc. site, including pulsed operations that were initiated in November 2022. Columbia West requested first and second quarter monitoring data from DEQ and was informed that DEQ has not yet received the most recent sampling results for the Tarr Inc. site.

The south portion of the subject property is within the LOF for the Tarr Inc. site. In addition, VOCs have been detected in ambient air, soil vapor, and/or groundwater on or adjoining the subject property at concentrations greater than one or more DEQ RBCs. Therefore, the release from the Tarr Inc. facility (ECSI No. 1139) represents a REC at the subject property.

7.2.2 Former Campbell Dry Cleaner

The Former Campbell Dry Cleaner site is located at 817 North Russell Street, adjoining tax lot 7900 to the east and upgradient of the subject property in the inferred groundwater flow direction. This site is listed in the DEQ ECSI database (ECSI No. 5680), DEQ Engineering Controls, DEQ VCP, DEQ Brownfields, EPA RCRAInfo, DEQ Drycleaners, and EPA FINDS/FRS databases.

The DEQ Engineering Controls database contains listings of sites with selected physical measures for the purpose of preventing or minimizing exposure to hazardous substances. The DEQ Brownfields database contains listings of Brownfields investigations and/or cleanups that have been conducted in Oregon. The DEQ Drycleaners database contains listings of active and closed drycleaning facilities.

A previous investigation conducted by GeoDesign, Inc. in 2014 at the Former Campbell Dry Cleaner site found concentrations of PCE and TCE in soil vapor above the DEQ *Vapor Intrusion into Buildings* RBCs for urban residential and occupational receptors. Chloroform, PCE, and TCE were detected in groundwater at the site at concentrations greater than the DEQ *Ingestion and Inhalation from Tapwater* RBC for residential, urban residential, and/or occupational receptors.

A February 2015 investigation conducted by Hart Crowser detected PCE in ambient indoor air samples at concentrations greater than the DEQ *Inhalation* RBCs for urban residential and occupational receptors and benzene and chloroform were detected in ambient air at concentrations greater than one or more of their respective DEQ RBCs. Hart Crowser completed an interim remedial action report for the Former Campbell Dry Cleaner site in July 2015 that summarized remedial actions completed at the site, including removing approximately 3 cubic yards of PCE-impacted soil from under the southwest portion of the building, installing a soil gas venting system in the building, sealing the boundaries between different levels of the building, constructing a sealed crawl space hatch, and follow-up ambient air sampling. Hart Crowser estimated that the extent of remaining soil impacts is horizontally limited to the Former Campbell Dry Cleaner site, but that soil gas impacts extend onto the southeast portion of tax lot 7900.

DEQ issued a staff memorandum in 2016 recommending a partial NFA determination for the Former Campbell Dry Cleaner site. Based on a review of the July 2015 Hart Crowser memorandum, DEQ concluded that confirmation indoor air sampling following the implementation of remedial measures demonstrated that indoor air conditions were protective of current and future building occupants. DEQ stated that the vapor mitigation system should operate until it is demonstrated that it is no longer necessary and future floor penetrations should

be repaired and sealed to limit vapor intrusion. In addition, DEQ stated that soil containing PCE and/or TCE would require appropriate characterization and management if excavated from the site.

The DEQ memorandum stated that the estimated horizontal extent of off-site soil and soil gas data lateral to the former dry cleaner is only an estimate, and DEQ estimated that the vertical extent of soil impacts extends to approximately 25 feet BGS. In August 2020, an Easement and Equitable Servitudes was recorded for ECSI No. 5680 that stipulated the vapor removal system must be continuously operated in the building crawl space until it is demonstrated that the system is no longer necessary, that the property owner may not extract groundwater for consumption or beneficial use, and that the owner or other parties may not occupy the property unless the controls are maintained.

DEQ's partial NFA determination is restricted to the Former Campbell Dry Cleaner site only and not the affected adjoining properties, which includes the subject property. Based on the presence of contaminants in groundwater and soil gas beneath tax lot 7900 at concentrations greater than DEQ RBCs and the exclusion of the subject property from DEQ's conditional NFA determination, the release from the Former Campbell Dry Cleaner site represents a REC at the subject property.

7.2.3 Environmental Protective Services

The Environmental Protective Services site adjoins tax lot 2300 to the south, cross-gradient to downgradient of the subject property in the inferred groundwater flow direction. This site is listed on the DEQ SWF/LF database (Facility ID 109442). The SWF/LF database contains listings of solid waste disposal facilities or landfills. The Environmental Protective Services facility reportedly operated as a fluorescent light tube recycling facility. There are no reported releases associated with the listing. Therefore, it is our opinion that the Environmental Protective Services site does not represent a REC at the subject property.

7.2.4 Heating Oil Tank – 836 N Russell Street

836 N Russell Street adjoins the subject property to the south across North Russell Street, cross-gradient to downgradient of the subject property in the inferred groundwater flow direction. This site was listed on the DEQ LUST database (LUST File No. 26-09-0517) in July 2009 for a release from a heating oil UST. Impacts were reportedly limited to soil, and groundwater was not encountered. DEQ issued an NFA determination for LUST File No. 26-09-0517 in August 2009. Based on the regulatory status of the site, distance from the subject property, media impacted, and inferred groundwater flow direction, the 826 N Russell Street site does not represent a REC at the subject property.

7.3 UNMAPPABLE/UNPLOTTABLE SITES

ERIS identified 14 unmappable/unplottable sites listed on 1 or more regulatory databases. Based on our review, none of the unmappable/unplottable listed sites appear to be the subject property. In addition, based on further research as to locations and/or regulatory status, it is our professional opinion that none of the 14 unmappable/unplottable sites represent a REC at the subject property.

8.0 INTERVIEWS

Columbia West interviewed the owner of the subject property and a state government official during the course of this assessment.

8.1 CURRENT OWNER AND/OR OCCUPANT

Columbia West interviewed Steve Streimer, the current property owner, on July 16, 2025. Mr. Streimer has been familiar with the subject property for over 30 years. Mr. Streimer indicated that his knowledge of the subject property has not changed since the previous investigations conducted by NV5, with the exception of the demolition of the former tool storage warehouse and the removal of a heating oil UST on tax lot 2700 in November 2023.

During the 2022 Phase I ESAs, Mr. Streimer was aware of the former gasoline UST on tax lot 2900 and stated it was located beneath the existing three-story office area of the upper HVAC shop. Mr. Streimer was also aware of the former heating oil USTs located on tax lots 7500 and 7900. Mr. Streimer was aware of the off-site Former Campbell Dry Cleaner site and the Tarr Inc. site and stated that periodic indoor and air and vapor samples had been collected from the south portion of the subject property. Mr. Streimer was not aware of any fill material being imported to the subject property and was not aware of any environmental liens or AULs associated with the subject property.

8.2 STATE GOVERNMENT OFFICIAL

Columbia West contacted Ray Hoy, DEQ project manager for the former on-site First Class Dry Cleaner (ECSI No. 6582), on July 16, 2025, for additional information regarding the ECSI listing. As of the date of this report, Mr. Hoy has not responded to our inquiry.

Columbia West also contacted Terra Metta, DEQ project manager for the Tarr Inc. site, on July 17, 2025, for recent sampling data. Ms. Metta provided the fourth quarter 2024 reports prepared by Farallon (see Section 7.2.1 [Tarr Inc.]) and stated that DEQ had not received sampling data for 2025.

9.0 SIGNIFICANT DATA GAPS

Significant data gaps were not encountered during this assessment.

10.0 LIMITATIONS

Columbia West conducted a Phase I ESA as requested by the client in conformance with ASTM E1527-21 and the scope of services identified in Section 1.2 (Scope of Services). Columbia West did not obtain information regarding subject property use and history prior to 1885. There were also discrete intervals of time between 1885 and the present that were not assessed because subject property use and history appeared to be consistent within those time periods. The data available appeared sufficient to render professional opinions regarding the Phase I ESA. Project work was conducted in conformance with accepted professional environmental consulting principles and practices.

ASTM E1527-21 states "No environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with a property, and this practice recognizes reasonable limits of time and cost."

Although a site reconnaissance did not reveal indications of significantly contaminated soil or water, impacted conditions may nevertheless be present. Additional media sampling, subsurface exploration, and laboratory analysis may provide more detailed information on potentially impacted areas that may not be readily apparent by visual observation.

This report was prepared solely for the client and is not to be reproduced without prior authorization from Columbia West. This Phase I ESA does not purport to address compliance with past or present environmental codes or regulations by subject property occupants and should not be construed as a legal opinion or document. Columbia West is not responsible for independent conclusions or recommendations made by others based on information presented in this report.

This Phase I ESA is based in part on unsubstantiated information provided to Columbia West from third-party sources during interviews or written correspondence. Columbia West provides no warranty as to the validity of the information. As described herein, this Phase I ESA is based on professional interpretations of acquired information relevant to the subject property at the time of assessment. This report should not be construed as a representative warranty of subsurface conditions. Discovery of future adverse or detrimental environmental conditions or subsurface soil that deviates significantly from those described in this report should immediately prompt further investigation. The above statements are in lieu of all other statements, expressed or implied.

11.0 DECLARATION

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR Part 312.10. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. Environmental Professional qualifications are presented in Appendix E. This report is subject to the limitations expressed in Appendix F.

♦ ♦ ♦

We appreciate the opportunity to work with Project^. Please contact us if you have questions regarding this report.

Sincerely,

Caroline B. Siegel
Environmental Project Manager

Colby R. Hunt, CHMM
Environmental Principal

REFERENCES

Apex 2014. *Final Remedial Investigation Report; Tarr, Inc.; 2429 North Borthwick Avenue; Portland, Oregon,* dated September 19, 2014.

ASTM International 2021. *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Process,* ASTM E1527-21.

DEQ 2016. *Memorandum; Former Campbell Dry Cleaner building; Staff Memorandum in support of a Partial Conditional No Further Action Determination; ECSI #5680,* dated July 14, 2016.

DEQ 2020. *Easement and Equitable Servitudes,* dated August 25, 2020.

Farallon Consulting, L.L.C. 2025. *2024 Monitoring and Performance Evaluation Report – Groundwater Remedy; Conger Facility; ECSI File No. 1139; 2429 North Borthwick Avenue; Portland, Oregon,* dated May 9, 2025.

Farallon Consulting, L.L.C. 2025. *Progress Report – Fourth Quarter 2024; Conger Facility – ECSI File No. 1139; 2429 North Borthwick Avenue; Portland, Oregon,* dated May 9, 2025.

GeoDesign, Inc. 2014. *Phase III Environmental Site Assessment; Campbell Dry Cleaner Brownfield Project; 817 and 819 North Russell Street; Portland, Oregon,* dated May 14, 2014.

Hart Crowser 2015. *Site Investigation Report; Former Campbell Dry Cleaner; Portland, Oregon,* dated February 5, 2015.

Hart Crowser 2015. *IRAM Completion Report; Former Campbell Dry Cleaner; Portland, Oregon; ECSI 5680,* dated July 30, 2015.

K&S Environmental, Inc. 2023. *Decommissioning Report for Heating Oil UST; Property Located at 753 N. Russell St., Portland, OR,* dated December 1, 2023.

NV5 2022. *Phase I Environmental Site Assessment; Borthwick Site; North Borthwick Avenue and North Russell Street; Portland, Oregon,* dated August 11, 2022.

NV5 2022. *Phase I Environmental Site Assessment; 739 N Knott Site; 739 North Knott Street; Portland, Oregon,* dated August 15, 2022.

NV5 2022. *Phase I Environmental Site Assessment; 829 N Russell Site; 829 North Russell Street; Portland, Oregon,* dated August 19, 2022.

NV5 2022. *Phase I Environmental Site Assessment; Block 9 Site; 740 North Knott Street; Portland, Oregon,* dated August 25, 2022.

NV5 2023. *Phase II Environmental Site Assessment; Block 9 Site; 740 North Knott Street; Portland, Oregon,* dated February 2, 2023.

NV5 2023. *Phase II Environmental Site Assessment; 829 N Russell Site; 829 North Russell Street; Portland, Oregon,* dated February 8, 2023.

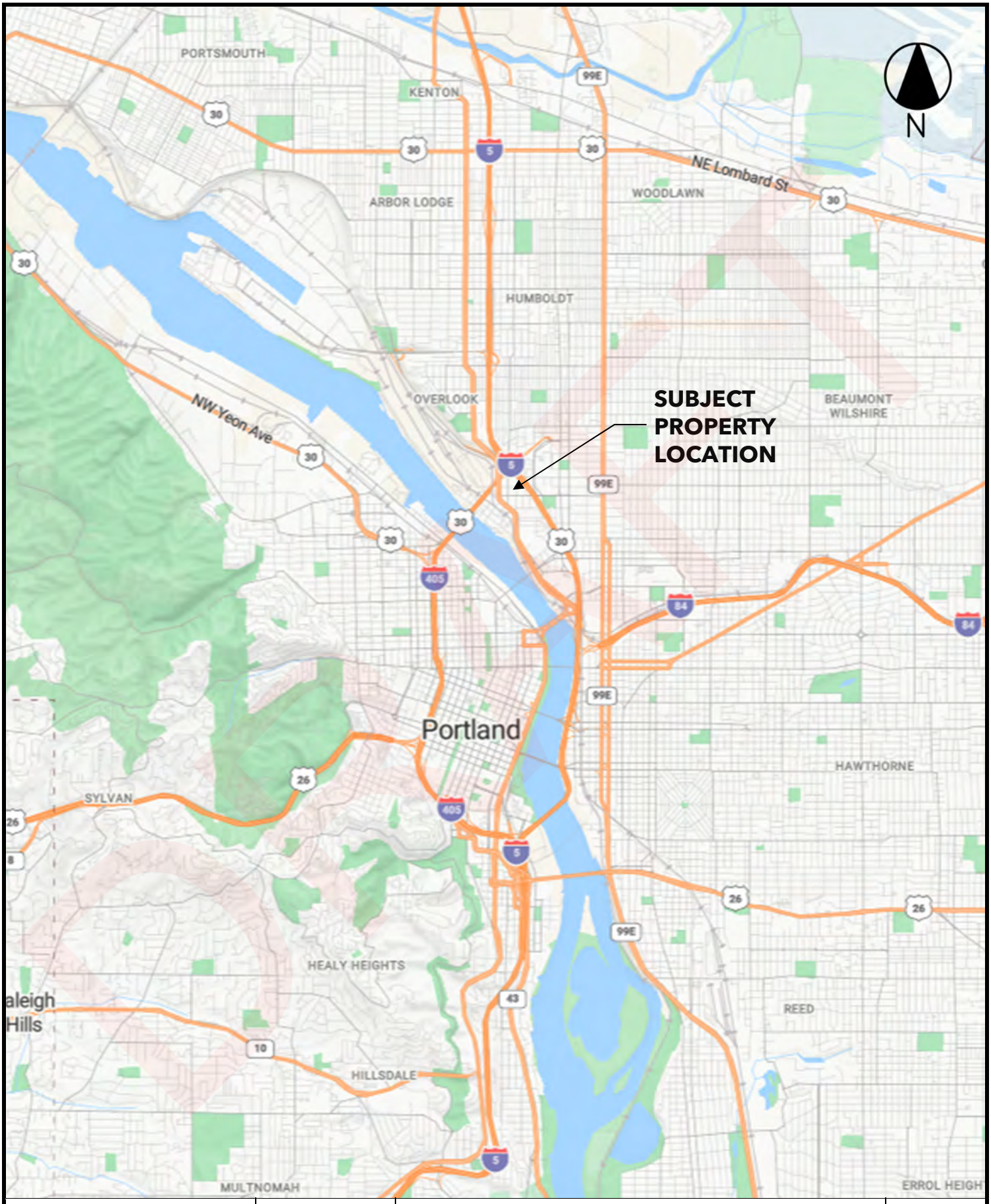
NV5 2023. *Additional Soil Characterization; 829 N Russell Site; 829 North Russell Street; Portland, Oregon,* dated June 2, 2023.

OWRD 2025. Oregon Water Resources Department Well Report Query. https://apps.wrd.state.or.us/apps/gw/well_log/. Accessed July 2025.

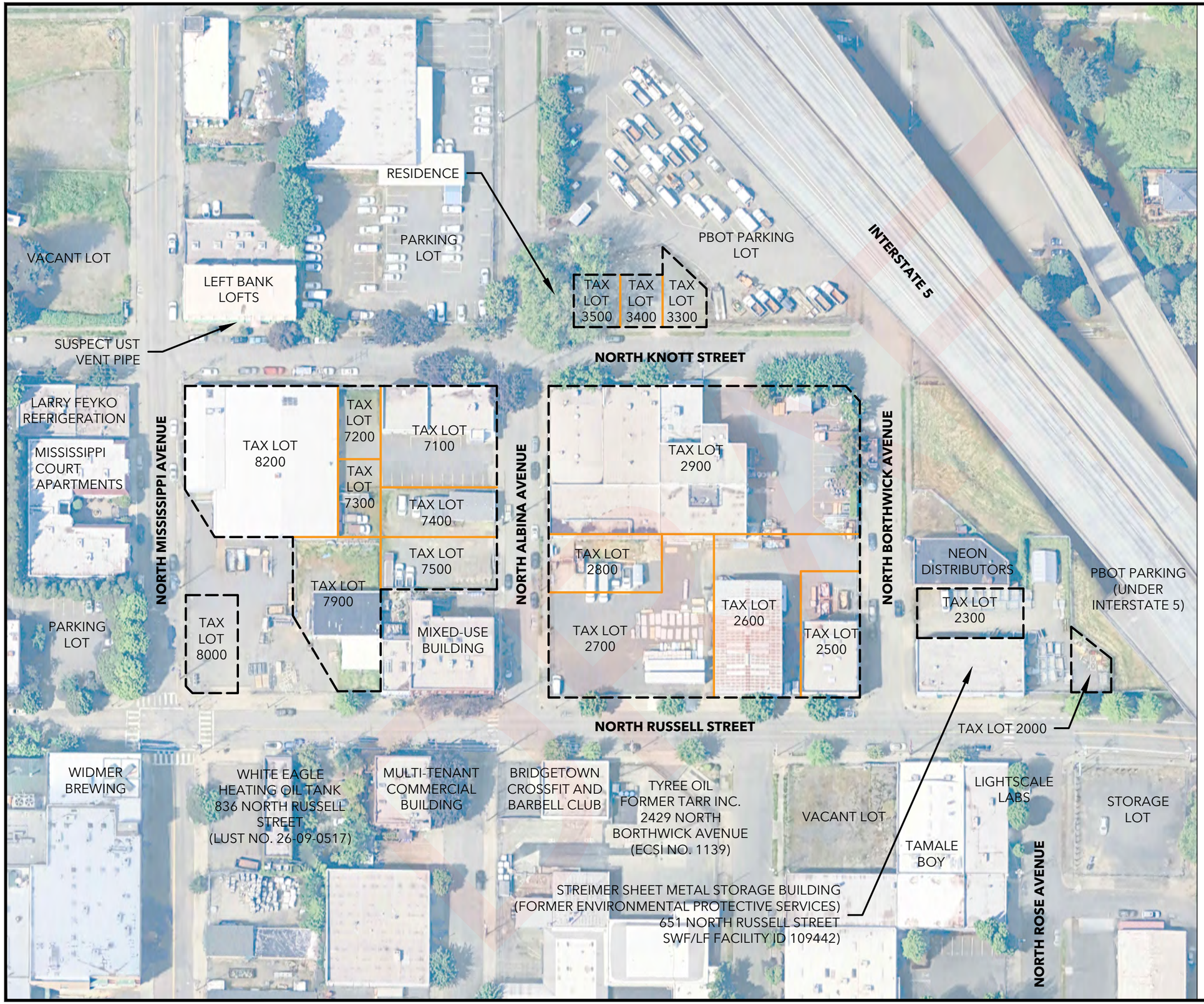
USDA 2025. Web Soil Survey. National Resources Conservation Services. https://websoilsurvey.nrcs.usda.gov/app/HomePage.htm. Accessed July 2025.

Wells et al. 2020. *Geologic Map of the Greater Portland Metropolitan Area and Surrounding Region, Oregon and Washington,* U.S. Geological Survey Scientific Investigations Map 3443, scale 1:63,360.

FIGURES



Geotechnical ▪ Environmental ▪ Special Inspections Columbia West Engineering, Inc	PROJECT NO.: PROJECT-3-02-1 JULY 2025	VICINITY MAP ALBINA CAMPUS PORTLAND, OREGON	FIGURE 1



LEGEND

- SUBJECT PROPERTY BOUNDARY
- TAX LOT BOUNDARY

N

0 22 44 66 88 110 220

NOTES:
1. AERIAL PHOTO SOURCED FROM GOOGLE EARTH.

Geotechnical ■ Environmental ■ Special Inspections
Columbia West Engineering, Inc

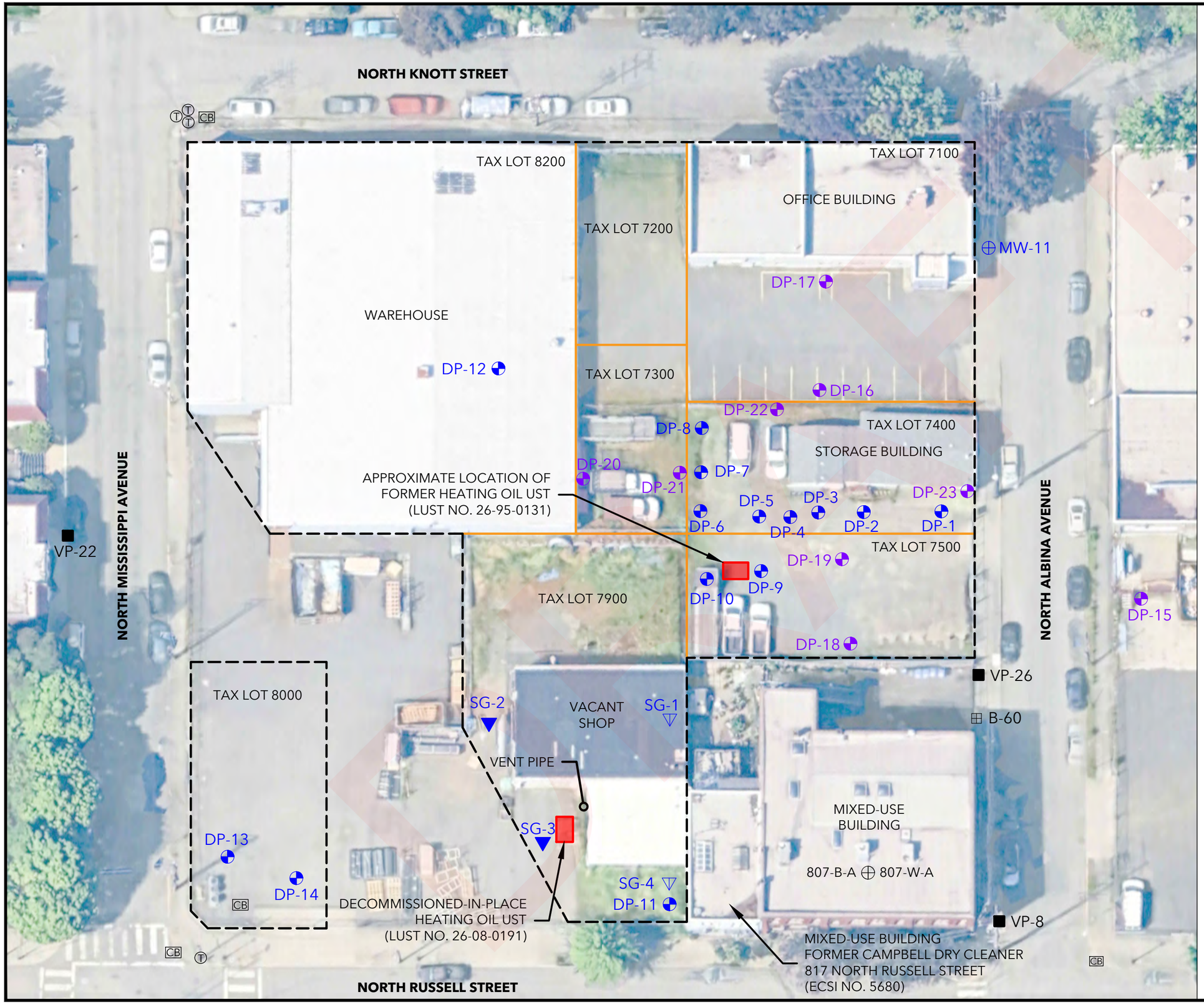
ALBINA CAMPUS
PORTLAND, OREGON
NORTH ALBINA AVENUE AND NORTH RUSSELL STREET

SITE PLAN

PROJECT NO.:
PROJECT-3-02-1

JULY 2025

FIGURE
2



LEGEND

- SUBJECT PROPERTY BOUNDARY
- TAX LOT BOUNDARY
- CB — CATCH BASIN
- T — POLE-MOUNTED TRANSFORMER
- MONITORING WELL (TARR INC. SITE)
- SHALLOW PERMANENT VAPOR POINT (TARR INC. SITE)
- TEMPORARY VAPOR POINT (TARR INC. SITE)
- AMBIENT AIR SAMPLE (TARR INC. SITE)
- DIRECT-PUSH BORING - (NV5, FEBRUARY 2023)
- SOIL GAS SAMPLE (5 FEET BGS) (NV5, FEBRUARY 2023)
- SOIL GAS SAMPLE (10 FEET BGS) (NV5, FEBRUARY 2023)
- DIRECT-PUSH BORING (UP TO 5 FEET BGS) ADDITIONAL SOIL CHARACTERIZATION (NV5, JUNE 2023)

N

0 9 18 27 36 45 90

NOTES:
1. AERIAL PHOTO SOURCED FROM GOOGLE EARTH.
2. EXPLORATION LOCATIONS ARE APPROXIMATE AND NOT SURVEYED.

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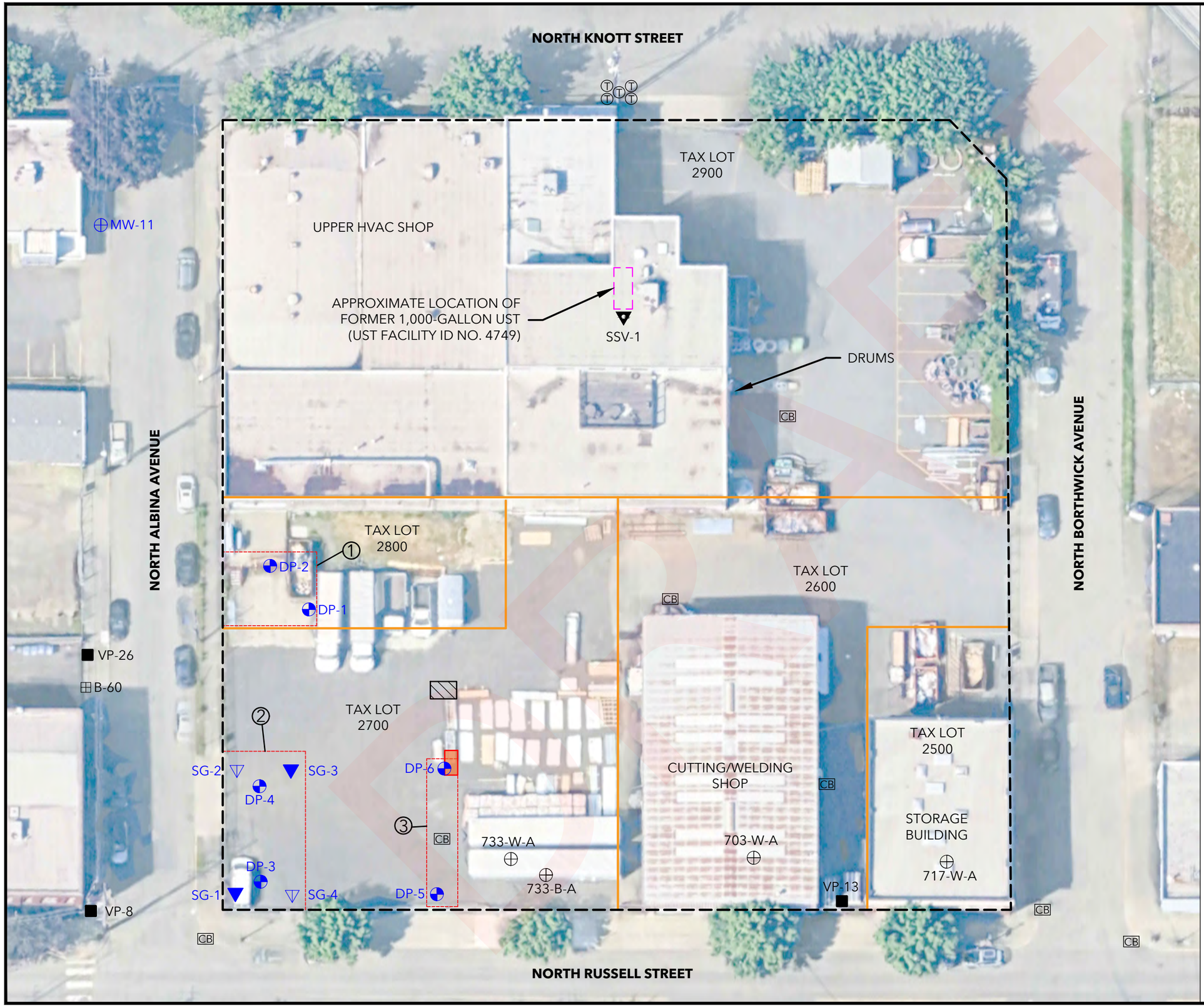
ALBINA CAMPUS
PORTLAND, OREGON
NORTH ALBINA AVENUE AND NORTH RUSSELL STREET

SITE PLAN DETAIL 1

PROJECT NO.: PROJECT-3-02-1

JULY 2025

FIGURE 3



LEGEND

- SUBJECT PROPERTY BOUNDARY
- TAX LOT BOUNDARY
- CB — CATCH BASIN
- Ⓣ — POLE-MOUNTED TRANSFORMER
- ⊕ — MONITORING WELL (TARR INC. SITE)
- ■ — SHALLOW PERMANENT VAPOR POINT (TARR INC. SITE)
- ⊞ — TEMPORARY VAPOR POINT (TARR INC. SITE)
- ⊕ — AMBIENT AIR SAMPLE (TARR INC. SITE)
- ◓ — DIRECT-PUSH BORING (NV5, FEBRUARY 2023)
- ▼ — SOIL GAS SAMPLE (5 FEET BGS) (NV5, FEBRUARY 2023)
- ▽ — SOIL GAS SAMPLE (10 FEET BGS) (NV5, FEBRUARY 2023)
- ▼ — SUB-SLAB VAPOR SAMPLE (NV5, FEBRUARY 2023)
- ▮ — HEATING OIL UST DECOMMISSIONED BY REMOVAL IN NOVEMBER 2023 (HOT ID 49885)
- ▨ — BACKFILLED PIT IDENTIFIED BY GEOPOTENTIAL (NV5, 2022)
- ① APPROXIMATE LOCATION OF FORMER TURNER S AUTO REPAIR SHOP
- ② APPROXIMATE LOCATION OF FORMER FIRST CLASS DRY CLEANER (ECSI NO. 6582)
- ③ LOCATION OF FORMER CHAS H GADE REPAIR SHOP

N

0 9 18 27 36 45 90

NOTES:
1. AERIAL PHOTO SOURCED FROM GOOGLE EARTH.
2. EXPLORATION LOCATIONS ARE APPROXIMATE AND NOT SURVEYED.

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ALBINA CAMPUS
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NORTH ALBINA AVENUE AND NORTH RUSSELL STREET

SITE PLAN DETAIL 2

PROJECT NO.: PROJECT-3-02-1

JULY 2025

FIGURE 4

LEGEND

- SUBJECT PROPERTY BOUNDARY
- TAX LOT BOUNDARY

N

0 6 12 18 24 30 60

NOTES:
1. AERIAL PHOTO SOURCED FROM GOOGLE EARTH.

Geotechnical ■ Environmental ■ Special Inspections
Columbia West Engineering, Inc

ALBINA CAMPUS
PORTLAND, OREGON
NORTH ALBINA AVENUE AND NORTH RUSSELL STREET

SITE PLAN DETAIL 3

PROJECT NO.:
PROJECT-3-02-1

JULY 2025

FIGURE
5