



**A.J. Eisenberg Airport,
1140 North Monroe Landing Road,
Oak Harbor, Washington 98277
Phase I Environmental Site
Assessment**

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Sign-off Sheet and Signatures of Environmental Professionals

This document entitled A.J. Eisenberg Airport, 1140 North Monroe Landing Road, Oak Harbor, Washington Phase I Environmental Site Assessment (Report) was prepared by Stantec Consulting Services Inc. ("Stantec") for the account of the Port of Coupeville (the "Client"). The conclusions in the Report are Stantec's professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

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I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in § 312.10 of Title 40 of the Code of Federal Regulations, Part 312, (40 CFR 312). I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the property. I have developed and performed all the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

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Abbreviations

AAI	All Appropriate Inquiries
ACM	Asbestos-containing material
AST	Aboveground Storage Tank
ASTM	ASTM International
AUL	Activity Use Limitation
BER	Business Environmental Risk
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulation
CREC	Controlled Recognized Environmental Conditions
EP	Environmental Professional
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
ft amsl	Feet above mean sea level
HREC	Historical Recognized Environmental Conditions
LUST	Leaking Underground Storage Tank
PCBs	Polychlorinated Biphenyls
PFAS	Per- and polyfluoroalkyl substances
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Conditions
USDA	United States Department of Agriculture
USGS	United States Geological Survey
UST	Underground Storage Tank
VEC	Vapor Encroachment Condition
VOCs	Volatile Organic Compounds



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Executive Summary
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1.0 EXECUTIVE SUMMARY

Stantec Consulting Services Inc. (Stantec) has completed a Phase I Environmental Site Assessment (ESA) report of the property located at 1140 North Monroe Landing Road, Oak Harbor, Washington (the “Subject Property”), on behalf of the Port of Coupeville (the “Client”). The work was performed according to Stantec’s proposal and terms and conditions dated April 5, 2023, and accepted by the Client on April 12, 2023. The Port of Coupeville (the “User”) has been designated as the User of this report. The intended use of this Phase I ESA is for due diligence in support of a real estate transaction of the Subject Property.

The Phase I ESA was conducted in conformance with the requirements of ASTM International (ASTM) Designation E1527-21, and All Appropriate Inquiries (AAI) as defined by the United States Environmental Protection Agency (EPA) in Title 40 of the Code of Federal Regulations, Part 312 (40 CFR 312), except as may have been modified by the scope of work, and terms and conditions, requested by the Client.

The Subject Property consists of three parcels totaling approximately 51.98 acres of land (Island County Property IDs R1322-450-1150, -446-2970, and -406-1800) developed with an approximately 9,900-square foot aircraft hangar, an approximately 6,200-square foot aircraft hangar and office building, an approximately 5,760-square foot aircraft hangar, an approximately 750-square foot aircraft hangar, paved parking areas, and a runway. The airport is also equipped with a card lock fueling station that includes two 10,000-gallon underground storage tanks (USTs) containing motor vehicle gasoline and aviation fuel, which were installed in 1971. The Subject Property is owned by and operated as A.J. Eisenberg Airport, LLC. The Subject Property is zoned Airport. Adjoining properties, as well as the nearby area, uses include commercial, residential, and agricultural uses.

The Subject Property was historically undeveloped and/or agricultural land with an apparent farm building from at least 1941 until approximately the late 1960s and early 1970s, when the current airport was constructed. A fire department building (operated by North Whidbey Fire and Rescue) has been located adjacent to the north of the Subject Property from approximately 1990 to present, with a firefighting training area from at least 2009 to present. Fire departments have historically conducted training exercises at airport facilities, which includes the use of Aqueous Film Forming Foam (AFFF). AFFF is a common source of per- and polyfluoroalkyl substances (PFAS). PFAS are currently classified as a family of “emerging contaminants” and are not currently identified as a hazardous substance under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). However, PFAS are regulated by Washington Department of Ecology under state hazardous waste law and the EPA anticipates finalizing PFAS regulations by the end of 2023 which may include drinking water standards.

Stantec requested information about firefighting training activities from the North Whidbey Fire and Rescue who indicated that AFFF has never been used at the facility. However, North Whidbey Fire and Rescue does not have any environmental records to definitively indicate that AFFF was not used and



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there are indications that North Whidbey Fire and Rescue has conducted training exercises on the Subject Property.

Stantec has performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-21 of 1140 North Monroe Landing Road, Oak Harbor, Washington, or the "Subject Property." Any exceptions to, or deletions from, this practice are described Section 2.3 of this report. This assessment has revealed the following recognized environmental conditions (RECs) in connection with the Subject Property:

- The two USTs located at the Subject Property have been in place since 1971, and the Subject Property owners have historically received several violations regarding the compliance monitoring of the USTs. Based on the length of service, age of the USTs, and absence of consistent compliance monitoring, there is a potential for an undocumented release to have occurred from the USTs and/or their associated piping and dispensers, which constitutes a REC.
- A complaint to the Washington State Department of Ecology (Ecology) reported paint stripping of aircraft which led to two soil samples being collected at the Subject Property. Lead and cadmium impacts were identified in soil at the reported area of historical paint stripping activities at the Subject Property. Groundwater was not investigated. The documented impacts to soil and the potential for further undocumented impacts in connection with the historical paint stripping activities constitutes a REC.

In addition, the following BER has been identified for the Subject Property:

- According to North Whidbey Fire and Rescue, firefighting training activities may have been conducted on the Subject Property. The potential for a release of AFFF related to firefighting training activities on and/or adjacent to the Subject Property constitutes a BER.

Controlled RECs (CRECs), Historical RECs (HRECs), and/or significant data gaps were not identified for the Subject Property.

Stantec recommends additional investigation to evaluate the potential for impacts to soil, groundwater, and/or soil gas at the Subject Property.

The preceding summary is intended for informational purposes only. Reading of the full body of this report is recommended.



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2.0 INTRODUCTION

The objective of this Phase I ESA was to perform AAI into the past ownership and uses of the Subject Property consistent with good commercial or customary practice as outlined by ASTM International (ASTM) in “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process,” Designation E1527-21. “All Appropriate Inquiries” is the process for evaluating a property’s environmental conditions for the purpose of qualifying for landowner liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) following final rule of Part 312 of Title 40, Code of Federal Regulations (40 CFR Part 312). The purpose of this Phase I ESA was to identify, to the extent feasible, adverse environmental conditions including recognized environmental conditions (“RECs”) of the Subject Property.

The ASTM E1527-21 standard indicates that the goal of the Phase I ESA is to identify RECs, as well as historical recognized environmental conditions (“HRECs”) and controlled recognized environmental conditions (“CRECs”) that may exist at a property. The term “recognized environmental conditions” is defined as:

- 1) the presence of hazardous substances or petroleum products in, on, or at the Subject Property due to a release to the environment;
- 2) the likely presence of hazardous substances or petroleum products in, on, or at the Subject Property due to a release or likely release to the environment; or
- 3) the presence of hazardous substances or petroleum products in, on, or at the Subject Property under conditions that pose a material threat of a future release to the environment.

ASTM defines a “HREC” 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 and meets current unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (e.g., activity and use limitations or other property use limitations). A HREC is not considered a REC.

ASTM defines a “CREC” as a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (e.g., as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), but with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (e.g., activity and use limitations, institutional controls, or engineering controls).

As defined by ASTM, RECs can include hazardous substances or petroleum products present under conditions in compliance with laws if that presence represents a material threat of future release. The release of hazardous substances or petroleum products is, however, not a REC if that presence is a *de minimis* condition. *De minimis* conditions are minor releases that generally do not present a material risk



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to human health and would not likely be subject to enforcement action if brought to the attention of governmental agencies. ASTM also considers the potential for a business environmental risk (BER), defined as a risk which can have a material environmental or environmentally driven impact on the business associated with the current or planned use of the Subject Property, not necessarily limited to those environmental issues required to be investigated by the ASTM standard. Consideration of BERs may involve addressing one or more ASTM non-scope considerations.

This Phase I ESA was conducted in accordance with our proposal to the Port of Coupeville dated April 5, 2023, and Client's authorization on April 12, 2023. The scope of work conducted during this Phase I ESA consisted of a visual reconnaissance of the Subject Property, interviews with key individuals, and review of reasonably ascertainable documents. The scope of work did not include an assessment for environmental regulatory compliance of any facility ever operated at the Subject Property (past or present), or sampling and analyzing of environmental media. Stantec was not contracted to perform an independent evaluation of the purchase or lease price of the Subject Property and its relationship to current fair market value. The conclusions presented in this Phase I ESA report are professional opinions based on data described herein. The opinions are subject to the limitations described in Section 2.3.

ASTM E1527-21 notes that the availability of record information varies from source to source. The User or Environmental Professional (EP) is not obligated to identify, obtain, or review every possible source that might exist with respect to a property. Instead, ASTM identifies record information that is reasonably ascertainable from standard sources. "Reasonably ascertainable" means:

1. Information that is publicly available;
2. Information that is obtainable from its source within reasonable time and cost constraints; and
3. Information that is practicably reviewable.

2.1 SUBJECT PROPERTY DESCRIPTION

The Subject Property consists of three parcels totaling approximately 51.98 acres of land (Island County Property IDs R1322-450-1150, -446-2970, and -406-1800) developed with an approximately 9,900-square foot aircraft hangar, an approximately 6,200-square foot aircraft hangar and office building, an approximately 5,760-square foot aircraft hangar ("large hangar"), an approximately 750-square foot aircraft hangar, paved parking areas, and a runway. The airport is also equipped with a card lock fueling station that includes two 10,000-gallon underground storage tanks (USTs) containing motor vehicle gasoline and aviation fuel, which were installed in 1971. The Subject Property is owned by and operated as A.J. Eisenberg Airport, LLC. The Subject Property is zoned Airport. Adjoining properties, as well as properties in the vicinity, are used for commercial, residential, and agricultural purposes. A Subject Property Location Map is illustrated on **Figure 1**. A Subject Property Vicinity Map illustrating the main features of the Subject Property is provided as **Figure 2**. Photographs taken during the site reconnaissance visit are provided in **Appendix A**.



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2.2 SPECIAL TERMS, CONDITIONS, AND ADDITIONAL ASSUMPTIONS

There were no special terms, conditions, or additional assumptions associated with this Phase I ESA.

2.3 EXCEPTIONS AND LIMITING CONDITIONS

This report documents work that was performed in accordance with generally accepted professional standards at the time and location in which the services were provided and given the schedule and budget constraints established by the client. No other representations, warranties, or guarantees are made concerning the accuracy or completeness of the data or conclusions contained within this report, including no assurance that this work has uncovered all potential and actual liabilities and conditions associated with the Subject Property.

This report provides an evaluation of selected environmental conditions associated with the Subject Property that was assessed at the time the work was conducted and is based on information obtained by and/or provided to Stantec at that time. There are no assurances regarding the accuracy and completeness of this information received from others.

Conclusions made within this report consist of Stantec's professional opinion as of the time of the writing of this report and are based solely on the scope of work described in the report, the limited data available, and the results of the work. They are not a certification of the Subject Property's environmental condition.

The client did not provide or contract Stantec to provide recorded title records or search results for environmental liens or activity and use limitations encumbering the property or in connection with the Subject Property. Stantec did not obtain historical records that document the property history in continuous 5-year intervals, and this resulted in data gaps. Although this represents data gaps, these data gaps are not considered to impact the EPs ability to identify RECs unless stated as such. Based on the information obtained during the course of this ESA and general knowledge of development at and near the Subject Property, the absence of this information did not affect the ability of the EPs to identify RECs, HRECs, CRECs, or *de minimis* conditions.



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This report has been prepared for the exclusive use of the client identified herein and any use of or reliance on this report by any third party is prohibited, except as may be consented to in writing by Stantec or as required by law. The provision of any such consent is at Stantec's sole and unfettered discretion and will only be authorized pursuant to the conditions of Stantec's standard form reliance letter. Stantec assumes no responsibility for losses, damages, liabilities, or claims, howsoever arising, from third party use of this report.

Project Specific limiting conditions are provided in Section 2.2.

The conclusions are based on the conditions encountered at the Subject Property by Stantec at the time the work was conducted. As the purpose of this report is to identify Subject Property conditions which may pose an environmental risk; the identification of non-environmental risks to structures or people on the Subject Property is beyond the scope of this assessment.

The findings, observations, and conclusions expressed by Stantec in this report are not an opinion concerning the compliance of any past or present owner or operator of the Subject Property which is the subject of this report with any Federal, state, provincial or local law or regulation.

This report presents professional opinions and findings of a scientific and technical nature. It does not and shall not be construed to offer a legal opinion or representations as to the requirements of, nor compliance with, environmental laws, rules, regulations, or policies of Federal, state, provincial or local governmental agencies.

Stantec specifically disclaims any responsibility to update the conclusions in this report if new or different information later becomes available or if the conditions or activities on the property subsequently change.

2.4 PERSONNEL QUALIFICATIONS

This Phase I ESA was conducted by, or under the supervision of, an individual that meets the ASTM definition of an EP. The credentials of the EP and other key Stantec personnel involved in conducting this Phase I ESA are provided in **Appendix B**.



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User-Provided Information
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3.0 USER-PROVIDED INFORMATION

ASTM E1527-21 describe responsibilities of the User to complete certain tasks in connection with the performance of “All Appropriate Inquiries” into the Subject Property. The ASTM standard requires that the EP request information from the User on the results of those tasks because that information can assist in the identification of RECs, CRECs, HRECs, or *de minimis* conditions in connection with the Subject Property. Towards that end, Stantec requested that the User provide the following documents and information:

Description of Information	Provided (Yes / No)	Description and/or Key Findings
User Questionnaire and/or Interview	Yes	Ms. Mary Hogan, Project Manager with the Port of Coupeville provided the User Questionnaire. She stated that the purchase price of the Subject Property reflects fair market value and that she was not aware of any obvious indicators of a release at the Subject Property. She identified the historical uses of the Subject Property as an airport and for agricultural use and stated that there is oil storage (in small containers and 55-gallon drums) at the Subject Property. Additional information on the oil storage is included in Section 5.
Environmental Liens or Activity and Use Limitations (AUL)	No	Ms. Hogan stated that she was not aware of environmental liens or AULs for the Subject Property.
Previous Environmental Permits or Reports Provided by User	Yes	Reports provided by the User were also provided by the Washington Department of Ecology (Ecology) and are further discussed in Section 4.2.1.
Purpose of the Phase I ESA		The intended use of the Phase I is for due diligence prior to acquisition.

The completed User Questionnaire returned to us by Ms. Hogan and dated April 24, 2023, is included in **Appendix C**.



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4.0 RECORDS REVIEW

The objective of consulting historical sources of information is to develop the history of the Subject Property and surrounding area and evaluate if past uses may have resulted in RECs. Physical setting records are evaluated to determine if the physical setting may have contributed to adverse environmental conditions in connection with the Subject Property. During the review of historical records, Stantec attempted to identify uses of the Subject Property from the present to the first developed use of the Subject Property. Stantec's research included the reasonably ascertainable and useful records described in this section.

4.1 PHYSICAL SETTING

A summary of the physical setting of the Subject Property is provided in the table below with additional details in the following subsections.

Topography:	The Subject Property is approximately 140 to 180 feet above mean sea level and slopes to the west (United States Geological Survey, 2017). Based on the topography, surface water on the Subject Property is expected to infiltrate or flow overland toward an unnamed intermittent creek approximately 1,500 feet to the west of the Subject Property.
Soil/Bedrock Data:	According to the US Department of Agriculture (USDA) National Resources Conservation Service (NRCS) Web Soil Survey (https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx), the soils at the Subject Property consist primarily of Coupeville loam, Whidbey gravelly loam, Mitchellbay gravelly sandy loam, and Zylstra-Mitchellbay complex. These soils range from somewhat poorly drained to moderately well drained and consist of clay loam, loam, sandy loam, and gravelly sandy loam. The geology of the Subject Property and site vicinity is mapped as Quaternary Alluvium, characterized by unconsolidated or semi-consolidated alluvial silt, sand, and/or gravel (Washington State Department of Natural Resources, 2021).
Estimated Depth to Groundwater/ Estimated Direction of Gradient:	According to the USDA-NRCS Web Soil Survey, groundwater is present at less than five feet below ground surface (bgs). Based on the topography, shallow surface water is expected to flow to the west toward an unnamed intermittent creek approximately 1,500 feet to the west of the Subject Property
NOTE: Site-specific groundwater flow direction and depth can only be determined by conducting site-specific testing, which Stantec has not conducted.	



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4.1.1 Subject Property Topography and Surface Water Flow

The Subject Property is approximately 140 to 180 feet above mean sea level and slopes to the west (United States Geological Survey, 2017). Based on the topography, surface water on the Subject Property is expected to infiltrate or flow overland toward an unnamed intermittent creek approximately 1,500 feet to the west of the Subject Property.

4.1.2 Regional and Subject Property Geology

According to the US Department of Agriculture (USDA) National Resources Conservation Service (NRCS) Web Soil Survey (<https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>), the soils at the Subject Property consist primarily of Coupeville loam, Whidbey gravelly loam, Mitchellbay gravelly sandy loam, and Zylstra-Mitchellbay complex. These soils range from somewhat poorly drained to moderately well drained and consist of clay loam, loam, sandy loam, and gravelly sandy loam. The geology of the Subject Property and site vicinity is mapped as Quaternary Alluvium, characterized by unconsolidated or semi-consolidated alluvial silt, sand, and/or gravel (Washington State Department of Natural Resources, 2021).

4.1.3 Regional and Subject Property Hydrogeology

The shallow water table is often a subdued expression of surface topography. Shallow groundwater generally flows from areas of groundwater recharge, such as hills and broad uplands, to areas of groundwater discharge, such as wetlands, rivers, and lakes. As such, the inferred shallow groundwater flow direction is to the west towards the unnamed intermittent creek located approximately 1,500 feet to the west of the Subject Property. Additionally, man-made features such as wells, roads, filled areas, buried utility lines and sewers, and stormwater drainage systems may alter the natural shallow groundwater flow direction. Groundwater is inferred to be less than five feet from the ground surface based on information from the USDA NRCS Web Soil Survey.

4.2 FEDERAL, STATE AND TRIBAL ENVIRONMENTAL RECORDS

A regulatory agency database search report was obtained from Environmental Data Resources (EDR), a third-party environmental database search firm. A complete copy of the database search report, including the date the report was prepared, the date the information was last updated, and the definition of databases searched, is provided in **Appendix D**.

Stantec evaluated the information listed within the database relative to potential impact to the Subject Property, assessing the potential for impacts based in part on the physical setting. As part of this process, inferences have been made regarding the likely groundwater flow direction at or near the Subject Property. As described in 4.1.3, the inferred shallow groundwater flow direction is likely to be to the west. Observations about the Subject Property and adjoining properties made during the Subject Property reconnaissance are provided in more detail in Section 5.



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4.2.1 Listings for Subject Property

The Subject Property was identified in the environmental database report in the Hazardous Sites List (HSL), Contaminated and Suspected Contamination Sites List (CSCSL), Underground Storage Tank (UST), Recovered Government Archive (RGA) Hazardous Waste Sites (HWS), Facility Index System (FINDS), Allsites, and Financial Assurance databases. Stantec obtained files from the Washington Department of Ecology (Ecology) for the Subject Property. According to the Environmental Report Tracking System (ERTS) Incident #519042 report, a caller indicated that paint stripping of aircraft was occurring at the airport (Subject Property) and that wash water was discharging to on-site soil. The Island County Health Department conducted an initial investigation by collecting two soil samples using a hand auger. The Island County Health Department noted that different colors of paint were present throughout the six-inch depth of the borehole, indicating a historical practice of paint stripping in this area of the Subject Property. Lead and cadmium were identified in soil at concentrations that exceeded their current Washington State Model Toxics Control Act (MTCA) Level A and/or B Cleanup Levels in one of the two soil samples. Other metals and volatile organic compounds, including 1,1,1-trichloroethane, methyl tert-butyl ether, and total xylenes, were identified above laboratory reporting limits; however, the concentrations of these compounds do not exceed current MTCA Cleanup Levels. Groundwater was not investigated. Based on the findings, Ecology listed the Subject Property as having an identified release of halogenated organic compounds, priority pollutant metals, and non-halogenated solvents and recommended additional investigation. The documented impacts in soil and the potential for additional undocumented impacts associated with the historical paint stripping activities constitutes a REC for the Subject Property.

According to the Ecology UST file, the Subject Property is equipped with a card lock fueling station that includes two 10,000-gallon USTs, reportedly installed in 1971. According to the Ecology records, one UST contains gasoline, and the second contains aviation fuel. Numerous violations are listed for the USTs from 1997 through 2021. On January 5, 2022, Ecology issued a letter to the Subject Property owner stating that two violations were observed during a 2021 inspection which had not been resolved: failure to verify functionality of overfill prevention devices for both USTs and failure to meet temporary closure requirements for the gasoline UST. As a result, Ecology fined the Subject Property owner \$700 and issued a notice that both USTs are subject to delivery prohibition. A 2023 leak test performed in March 2023 indicated that the USTs passed inspection; however, based on the age of the USTs, the history of compliance related violations, and absence of consistent compliance monitoring, the potential for an undocumented release to have occurred from the USTs and/or associated piping and dispensers constitutes a REC for the Subject Property. The RGA HWS, CSCSL, HSL, FINDS, Allsites, and Financial Assurance listings are related to the on-site release and/or the presence of USTs on the Subject Property. Excerpts of agency records obtained from Ecology are included in **Appendix F**.



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4.2.2 Listings for Adjoining and Nearby Sites with Potential to Impact Subject Property

Stantec assessed data presented in the environmental agency database search report to evaluate the potential for conditions on adjoining and nearby sites to pose a REC, CREC, or HREC for the Subject Property. The evaluation included an opinion of the potential for contamination by hazardous substances or petroleum products to migrate to the Subject Property from an adjoining or nearby site, including by vapor migration or encroachment (i.e., potential for a vapor encroachment condition [VEC]. ASTM E2600-22 Standard Guide for Vapor Encroachment Screening on property Involved in Real Estate Transactions (ASTM, 2022) was used as the basis for a Tier I Vapor Encroachment Screen (VES) for the Subject Property. This included evaluation of release sites within 1/10 mile for Petroleum Hydrocarbon releases, and 1/3 mile for volatile and semi-volatile organic compound (VOC, SVOC), plus other potential vapor phase contaminants (such as mercury).

Based on distance from the Subject Property, Stantec considers the listings in the database search report provided in **Appendix D** to not constitute a REC for the Subject Property.

4.3 LOCAL/REGIONAL ENVIRONMENTAL RECORDS

Stantec checked the following sources to obtain information pertaining to Subject Property use and/or indications of RECs in connection with the Subject Property:

4.3.1 Fire Department

Agency Name, Contact Information, Date	Finding
City of Oak Harbor Fire Department Online public records request https://oakharbor.gov/199/Fire April 24, 2023	The City of Oak Harbor responded that they did not possess records for the Subject Property because it is not located within city limits and referred Stantec to the North Whidbey Fire and Rescue.
North Whidbey Fire and Rescue Public records request office@nwfr.org April 25, 2023	On April 27, 2023, North Whidbey Fire and Rescue responded that AFFF has never been used but there is a recollection of training activities being conducted by North Whidbey Fire and Rescue on the Subject Property. North Whidbey Fire and Rescue also indicated that they do not have any records regarding: training activities, environmental records, chemical storage, past fires, release responses, or tank pulls/permits on their facility or the adjacent Subject Property. This facility is discussed in additional detail in Section 5.8.1.



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4.3.2 Local Building and/or Planning Department Records

Agency Name, Contact Information, Date	Findings
Island County Planning Department Online records database https://co-island-wa.smartgovcommunity.com/Parcels/ April 25, 2023	Stantec reviewed records available on the Island County Planning Department website. Records included inspection documentation for the on-site sewage system, several documents for the construction of a new hangar (dated between 2012 and 2017), and a mechanical permit. RECs were not identified in connection with the reviewed records.

4.3.3 Local/Regional Pollution Control Agency Department Records

Agency Name, Contact Information, Date	Findings
Washington Department of Ecology Online public records request https://ecologywa.govqa.us/WEBAPP/_rs/ April 19, 2023	Files provided by Ecology are discussed in Section 4.2.1. Excerpts from Ecology files are provided in Appendix F.

4.4 HISTORICAL RECORDS REVIEW

4.4.1 Land Title Records/Deeds

Land title records, deeds, environmental liens, and activity and use limitation documentation was not provided by the User, and public records were not searched by Stantec.

4.4.2 Aerial Photographs

Stantec reviewed historical aerial photographs provided by Environmental Data Resources, Inc. (EDR). The general type of activity on a property and land use changes can often be discerned from the type and layout of structures visible in the photographs. However, specific elements of a facility's operation usually cannot be discerned from aerial photographs alone. The following table summarizes Stantec's observations of the reviewed historical aerial photographs. Copies of the historical aerial photographs are provided in **Appendix E**.

Year	Scale	Observations of Subject Property and Adjoining/Nearby Properties
1941	1"=625'	The Subject Property appears to be developed as agricultural land and a building located in the central portion of the Subject Property. The surrounding properties appear to consist of agricultural land or undeveloped forested land.



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Year	Scale	Observations of Subject Property and Adjoining/Nearby Properties
1951, 1968	1"=625'	The Subject Property appears to be developed with agricultural land and a building located in the central portion of the Subject Property. The southwest- and northeast- adjoining sites appear to be developed with several structures. The remaining surrounding properties appear to consist of agricultural land or undeveloped forested land.
1972	1"=625'	The Subject Property appears to be developed with an airport equipped with a runway and two additional buildings that appear to be hangars. The adjoining sites appear similar to previous aerial photographs.
1979, 1981, 1983	1"=625'	An additional building is present on the western portion of the Subject Property. The adjoining sites appear similar to previous aerial photographs.
1990	1"=625'	The Subject Property appears similar to previous aerial photographs. A building is present on the north- adjoining site. The remainder of the adjoining sites appear similar to previous aerial photographs.
2006, 2011, 2015, 2019	1"=625'	The Subject Property appears similar to previous aerial photographs, except the building on the central portion of the Subject Property is no longer present. An additional building is present on the north- adjoining site, resembling present-day configuration. Some airplanes are visible on the north- adjoining site in some photos. The remainder of the adjoining sites appear similar to previous photographs.

Name of aerial photograph source: USGS (1990, 1983, 1979, 1972, 1968, and 1951) and USDA/Farm Service Agency (2019, 2015, 2011, 2006, 1981, and 1941).

RECs were not identified during the review of the historical aerial photographs.

4.4.3 City Directories

Stantec retained EDR to research available city directories for the Subject Property and adjoining and nearby properties, in approximately five-year intervals. Copies of the city directory listings are provided in Appendix E.

The following is a summary of Stantec's review of the city directory listings:



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Subject/Adjoining Properties	Year	Listed Occupants
1140 North Monroe Landing Road	1992	Not listed
	1995	Harbor Airlines; Budget Rent A Car
	2000	Harbor Air
	2005, 2010	Not listed
	2014	AJ Eisenberg Airport LLC
	2017	AJ Eisenberg Airport LLC; Jet City Sky Diving
	2020	Not listed
Adjoining N 1160 North Monroe Landing Road	1992, 1995, 2000, 2005, 2010, 2014, 2017	Not listed
	2020	N Whidbey Fire and Rescue
Adjoining N 1180 North Monroe Landing Road	1992, 1995, 2000, 2005	Not listed
	2010, 2014	Private residence
	2017, 2020	Not listed
Adjoining E 1119 Balda Road	1992, 1995, 2000, 2005, 2010, 2014, 2017, 2020	Not listed
Adjoining S 1084 North Monroe Landing Road	1992, 1995, 2000	Private residence
	2005	Hardwood Floors; Just Facts; Lupien, Omer J
	2010	Hardwood Floors; Lupien, Omer J
	2014	Private residence
	2017	Not listed
	2020	Private residence
Adjoining S 1044 North Monroe Landing Road	1992, 1995, 2000, 2005, 2010, 2014, 2017, 2020	Private residence
Adjoining W 1159 North Monroe Landing Road	1992, 1995	Not listed
	2000, 2005, 2010	Private residence
	2014	Occupant unknown
	2017, 2020	Not listed
Adjoining W	1992	Not listed



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Subject/Adjoining Properties	Year	Listed Occupants
1536 Balda Road	1995, 2000, 2005, 2010, 2014, 2017, 2020	Private residence

RECs were not identified during the review of the City Directories.

4.4.4 Historical Fire Insurance Maps

Fire insurance maps were developed for use by insurance companies to depict facilities, properties, and their uses for many locations throughout the United States. These maps provide information on the history of prior land use and are useful in assessing whether there may be potential environmental contamination on or near the Subject Property. These maps, which have been periodically updated since the late 19th century, often provide valuable insight into historical Subject Property and adjoining and nearby property uses.

Stantec requested fire insurance maps from EDR; however, no coverage exists for the Subject Property. The Sanborn® Map Search Report indicating the absence of coverage is presented in **Appendix E**.

4.4.5 Historical Topographic Maps

Stantec reviewed historical USGS 7.5-minute Topographic Maps of the Oak Harbor, Washington Quadrangle (scale 1:24,000) and 15-minute Topographic Maps of the Coupeville, Washington and Deception Pass Quadrangles (scales ranging from 1:50,000 to 1:62,500) to help identify past Subject Property and adjoining and nearby property usage and areas of potential environmental concern. Copies of the historical maps are provided in **Appendix E**.



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The following table summarizes the maps reviewed and our observations.

Year	Scale	Observations of Subject Property and Adjoining/Nearby Properties
1936	1:50,000	The majority of the Subject Property is not depicted on the topographic map. The southern portion of the Subject Property and south-adjointing sites were depicted on the topographic map and appear to be undeveloped and/or agricultural land.
1943	1:62,500	The Subject Property and surrounding sites appear to be undeveloped and/or agricultural land.
1951/1953	1:62,500	The Subject Property and surrounding sites to the north, east, and west appear to be undeveloped and/or agricultural land. A structure is located to the south of the western portion of the Subject Property. The majority of the south-adjointing sites appear to be undeveloped and/or agricultural land.
1998	1:24,000	The Subject Property is depicted as an airport with three buildings, resembling present-day configuration. The north-adjointing sites are developed with structures resembling present-day configuration. The east- and west-adjointing sites appear to be undeveloped and/or agricultural land. The south-adjointing site is not depicted.
2014, 2017, 2020	1:24,000	The Subject Property is labeled as an airport and the north-adjointing site is labeled as a fire station; however, structures are not depicted on this map for the Subject Property or adjoining sites.

RECs were not identified during the review of the topographic maps.

4.4.6 Other Historical Sources

No other historical sources were researched.



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5.0 SITE RECONNAISSANCE

A visit to the Subject Property and its vicinity was conducted by Aaron Wisher on April 14, 2023. Access to the Subject Property was provided by Mary Hogan, Project Manager at the Port of Coupeville. Stantec was accompanied by Mary Hogan, Mark Varljen (Citizen, Environmental Consultant), Don Mehan (Pilot/Tenant), and Omer Lupien (Neighbor/ former property owner’s son) during the Subject Property visit. Figure 2 provides information about the Subject Property and adjoining sites and the location of potential areas of environmental concern. Detailed Subject Property features are shown on Figure 2. Photographs collected during the site reconnaissance are included in **Appendix A**.

5.1 SITE RECONNAISSANCE METHODOLOGY

The site reconnaissance focused on observation of current conditions and observable indications of past uses and conditions of the Subject Property that may indicate the presence of RECs. The reconnaissance of the Subject Property was conducted on foot and Stantec utilized the following methodology to observe the Subject Property:

- Traverse transects across the Subject Property where practical on an active airport;
- Traverse the periphery of all structures on the Subject Property; and,
- Visually observe accessible interior areas expected to be used by occupants or the public maintenance and repair areas, utility areas, and a representative sample of occupied spaces.

Weather conditions during the visit to the Subject Property were clear and sunny. There were no weather-related Subject Property access restrictions encountered during the reconnaissance visit.

5.2 GENERAL DESCRIPTION

Subject Property and Area Description:	The Subject Property is located in a rural area of Whidbey Island and surrounded by pasture and farmland. The Subject Property is an active private airport with one runway and multiple airplane storage hangars. The airport includes a card lock fueling station, and an asphalt paved parking lot.
Subject Property Operations:	The Subject Property is an active private airport. Recently it operated as a commercial airline (Ryan Air) with scheduled flights, however it is not currently being used in that manner.
Structures, Roads, Other Improvements:	The Subject Property is improved with a single asphalt paved runway, A large single-story maintenance and storage hangar (large hangar), two smaller renter-occupied single-story maintenance and storage hangars (one of which includes former operations and waiting area for a small commercial airline), two small portable type single airplane storage hangars, an asphalt paved parking lot, and a small well house and



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	groundwater well.
Subject Property Size (acres):	Approximately 51.98 acres
Estimated % of Subject Property Covered by Buildings and/or Pavement:	5%
Observed Current Subject Property Use/Operations:	Private airport
Observed Evidence of Past Subject Property Use(s):	Range/pasture lands
Sewage Disposal Method (and age):	Septic tank (unknown age)
Potable Water Source:	Shared private well
Electric and Natural Gas Utilities:	Puget Sound Energy

5.3 HAZARDOUS SUBSTANCES AND PETROLEUM PRODUCTS

The following table summarizes Stantec's observations during the Subject Property reconnaissance.

Observations	Description/Location																												
Hazardous Substances and Petroleum Products as Defined by CERCLA 42 U.S.C. § 9601(14) with identified uses:	In general, housekeeping at the site is poor with numerous small containers of maintenance related petroleum products present throughout the hangar storage and maintenance areas. These included new and used motor oils, hydraulic oils, greases, and lubricants. Some containers showed signs of spillage; however, the concrete floors are in good condition and the spills are considered <i>de minimis</i> in nature. Used materials are not disposed of on site, and it expected to be removed by each user of the rented hangars.																												
Drums/Totes/Intermediate Bulk Containers (≥ 5 gallons):	The following list includes the location, size and contents of Intermediate Bulk Containers identified at the time of the Subject Property reconnaissance. <table border="1" data-bbox="462 1444 1429 1841"> <thead> <tr> <th>Location</th> <th>Type</th> <th>Size (gallons)</th> <th>Contents</th> </tr> </thead> <tbody> <tr> <td>exterior: SW corner of large hangar</td> <td>Steel Drum</td> <td>55</td> <td>empty</td> </tr> <tr> <td>exterior: SW corner of large hangar</td> <td>Steel Tank</td> <td>~450</td> <td>heating oil, empty</td> </tr> <tr> <td>exterior: SW corner of large hangar</td> <td>Plastic Tote</td> <td>275</td> <td>unknown/empty</td> </tr> <tr> <td>exterior: SW corner of large hangar</td> <td>Steel Drum</td> <td>40</td> <td>lube oil/empty</td> </tr> <tr> <td>Interior: SW corner of large hangar</td> <td>Steel Drum</td> <td>55</td> <td>15W/30 oil/75% full</td> </tr> <tr> <td>Interior: NW room in large hangar</td> <td>Steel Drum</td> <td>55</td> <td>hydraulic Fluid/ 75% full</td> </tr> </tbody> </table>	Location	Type	Size (gallons)	Contents	exterior: SW corner of large hangar	Steel Drum	55	empty	exterior: SW corner of large hangar	Steel Tank	~450	heating oil, empty	exterior: SW corner of large hangar	Plastic Tote	275	unknown/empty	exterior: SW corner of large hangar	Steel Drum	40	lube oil/empty	Interior: SW corner of large hangar	Steel Drum	55	15W/30 oil/75% full	Interior: NW room in large hangar	Steel Drum	55	hydraulic Fluid/ 75% full
Location	Type	Size (gallons)	Contents																										
exterior: SW corner of large hangar	Steel Drum	55	empty																										
exterior: SW corner of large hangar	Steel Tank	~450	heating oil, empty																										
exterior: SW corner of large hangar	Plastic Tote	275	unknown/empty																										
exterior: SW corner of large hangar	Steel Drum	40	lube oil/empty																										
Interior: SW corner of large hangar	Steel Drum	55	15W/30 oil/75% full																										
Interior: NW room in large hangar	Steel Drum	55	hydraulic Fluid/ 75% full																										



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Observations	Description/Location			
	Interior: SW corner of large hangar	Steel Drum	55	used oils/65% full
	Exterior: North of large hangar	Steel Drum	55	unknown contents/empty
	Interior: private hangar east of office	Steel Drum	55	used oils/40% full
	Exterior: North of portable hangar	Steel Drum	55	unknown contents/empty
Strong, Pungent, or Noxious Odors:	None detected			
Pools of Liquid:	None observed			
Unidentified Substance Containers:	None observed			
Polychlorinated biphenyl (PCB)-Containing Equipment:	None observed			
Other Observed Evidence of Hazardous Substances or Petroleum Products:	Fluorescent light tubes containing mercury were stored and used in multiple locations, including the large hangar, the office area, and the rented hangar space. The debris pile behind the portable airplane storage structures also contained used fluorescent tubes.			

5.4 INTERIOR OBSERVATIONS

Stantec made the following observations during the site reconnaissance of the building interiors at the Subject Property and/or identified the following information during the interview or records review portions of the assessment:

Observations	Description
Heating/Cooling Method:	Currently the large hangar is unheated, however there are overhead heaters connected to an above-ground AST containing heating oil. The office building is heated with a forced air furnace using propane supplied from an AST located to the north of the large hangar.
Surface Stains or Corrosion:	None observed
Floor Drains and Sumps:	None observed
Other Interior Observations:	None observed



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5.5 EXTERIOR OBSERVATIONS

Stantec made the following observations during the site reconnaissance of exterior areas of the Subject Property and/or identified the following information during the interview or records review portions of the assessment:

Observations	Description
On-site Pits, Ponds, or Lagoons:	None observed
Stained Soil or Pavement:	None observed
Stressed Vegetation:	None observed
Waste Streams and Waste Collection Areas:	Municipal waste is removed by each generator and not stored onsite. Until recently there was a dumpster located at the west end of the large hangar. There were no signs of staining in that area.
Solid Waste Disposal:	No areas indicative of solid waste disposal were observed.
Potential Areas of Fill Placement:	No mounds, piles, or depressions suggesting the placement of fill material were observed on the Subject Property.
Wastewater:	No exterior wastewater discharge was observed.
Stormwater:	Stormwater from roof drains emptied onto ground surface. There is a north-south channelized trench that collects runoff from the surface areas near the structures and moved to a pond that is located on the south adjacent property. No indications of stressed vegetation or staining were noted.
Wells:	A potable water well, constructed earlier than 1950, is located on the Subject Property and is shared with the south adjacent property via a covenant. The hand dug well is approximately 17 feet below the ground surface.
Septic Systems:	A septic system is installed onsite and the drain field is located to the southwest of the large hangar. The age and condition are not known. No indications of stressed vegetation, staining, or soil subsidence were observed.
Other Exterior Observations:	A card lock fueling station located to the north of the large hangar which includes two 10,000-gallon USTs containing gasoline and aviation fuel. No signs of staining were observed. Airport operators staff forwarded tank records to Stantec, which were also provided by Ecology and are further discussed in Section 4.2.1.

5.6 UNDERGROUND STORAGE TANKS/STRUCTURES

Existing USTs:	Two active, steel, 10,000-gallon fuel USTs, containing motor vehicle gas and aviation fuel, with vent and fill pipes are located in the fueling area to the north of the large hangar and used for airplane and on-site vehicle refueling. No staining, odors, or impacts
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	associated with the USTs were observed. Leak-monitoring activities conducted by the operator, and tank history was provided to Stantec. The USTs are further discussed in Section 4.2.1.
Former USTs:	No visible evidence (fill pipes, vent pipes, dispensers, surface patches), reports, or other evidence of the former presence of USTs was discovered during this Phase I ESA.
Other Underground Structures:	An electrical vault was observed at the northwest corner of the large hangar and was believed to contain a step-down transformer and service. The area appeared clean, and no staining was observed. It appeared that the vault was installed recently.

5.7 ABOVEGROUND STORAGE TANKS

Existing ASTs:	A steel, approximately 450-gallon, AST located on the southwest corner of the large hangar was previously used to fuel two ceiling suspended heaters inside the large hangar. The tank is currently empty and no longer used. No signs of leaking were observed. No history was reported about this tank. An approximately 400-gallon propane AST is installed to the north of the large hangar on a grass surface.
Former ASTs:	No visible evidence (fill pipes, vent pipes, dispensers, surface stains), reports, or other evidence of the former presence of ASTs was discovered during this Phase I ESA.

5.8 ADJOINING PROPERTIES

5.8.1 Current Uses of Adjoining Properties

As viewed from the Subject Property and/or from public rights-of-way, Stantec made the following observations about use and activities on adjoining sites:

NORTH	This site appears to be undeveloped, except for the North Whidbey Fire and Rescue Station to the northwest and a residential parcel to the northeast.
EAST	This site appears to be pasture or farmlands.
SOUTH	This site appears to be pasture or farmlands, except for a residential parcel to the southwest.
WEST	This site appears to be pasture or farmlands.

A fire department building operated by North Whidbey Fire and Rescue has been located on the north adjacent site from approximately 1990 to the present day, with a firefighting training area from at least 2009 to present. Fire departments have historically conducted training exercises at airport facilities and there are accounts of North Whidbey Fire and Rescue conducting firefighting training activities on the Subject Property, which may include the use of AFFF. AFFF is a common source of per- and polyfluoroalkyl substances PFAS. PFAS are currently classified as a family of “emerging contaminants” and are not currently identified as a hazardous substance under CERCLA. However, PFAS are regulated by Washington Department of Ecology under state hazardous waste law and the EPA anticipates finalizing PFAS regulations by the end of 2023 which may include drinking water standards. Therefore,



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the potential for a release associated with the firefighting training activities on and/or adjacent to the Subject Property constitutes a BER.

5.8.2 Observed Evidence of Past Uses of Adjoining Properties

Observations of adjoining sites providing indications of past use and activities, if any, are described below.

NORTH	None observed
EAST	None observed
SOUTH	None observed
WEST	None observed

5.8.3 Pits, Ponds, or Lagoons on Adjoining Properties

As viewed from the Subject Property and/or from public rights-of-way, Stantec made the following observations about the presence of pits, ponds, and lagoons on adjoining sites:

NORTH	None observed
EAST	None observed
SOUTH	The residential parcel to the south of the Subject Property contains a pond. No stressed vegetation or impacts were observed.
WEST	None observed

5.9 OBSERVED PHYSICAL SETTING

Topography of the Subject Property and Surrounding Area:	The western one quarter of the Subject Property is relatively level and gently draining to the south. The eastern three quarters of the Subject Property, including the runway, moderately slopes up to the east.
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Interviews
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6.0 INTERVIEWS

Stantec conducted interviews with the following individuals:

Name, Contact Information, and Date of Interview	Relationship to Subject Property	Key findings:
Mary Hogan	Project Manager at the Port of Coupeville	Ms. Hogan supplied responses to the interview questionnaire and user questionnaire. Ms. Hogan did not have extensive knowledge of the site. Ms. Hogan provided access to the site.
Mark Varljen	Private Citizen – Environmental Services Consultant	Mr. Varljen has been involved with the Subject Property as a historian and in an environmental consultant capacity. Mr. Varljen outlined the fueling operations, testing and UST inspection history at the Subject Property. Mr. Varljen stated that commercial operations at the airport are intended to continue in the future.
Don Mehan	Tenant (26 years)	Mr. Mehan has been a long-term tenant at the Subject Property and supplied much of the information about day-to-day operations at the Subject Property. Of note, Mr. Mehan stated that an old stream or drainage feature extended across the site, and that it is tightlined under the runway, tarmac, and parking lot areas before exiting into a shallow ditch which runs around the south side of the large hangar and extends to the southeast along an access road, ultimately emptying into a pond located on the south adjacent property. There are stormwater drains located north of the large hangar that appear to empty into this ditch as well. Mr.



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		<p>Mehan stated that each tenant is responsible for removing hazardous wastes and trash from the airport, as there is no supplied services. Mr. Mehan mentioned that a former tenant was reported to Ecology for removing paint from an aircraft in an unauthorized manner on or near a concrete pad at the east end of the rented hangars. Mr. Mehan is not sure of the details related to this event. Mr. Mehan does not know of any spills or releases since he has been a tenant on the site. Mr. Mehan notes that the roofs on each of the buildings have leaked or are still leaking. No mold or mildew was noted.</p>
<p>Omer Lupien</p>	<p>Neighbor (Former Owner's Son)</p>	<p>Mr. Lupien accompanied Stantec on a portion of the site walk. Mr. Lupien mentioned that the onsite water well is shared with him and that it was dug by hand a couple times to a depth of about 17-feet below ground surface. Mr. Lupien stated that the grove of trees and shrubs to the north of the well house is the location of the former granary building which was moved to his property in the past and is being used as a storage shed. Mr. Lupien said there used to be a barn to the north of the granary in the open field, but it had fallen down and was ultimately removed. Mr. Lupien stated that the Subject Property was a former dairy farm. Mr. Lupien was not aware of any spills or releases since he has been associated with the site.</p>



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Evaluation
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7.0 EVALUATION

This section provides a summary overview of or Findings, Opinions, and Conclusions.

7.1 FINDINGS AND OPINIONS

Information gathered from interviews, reviews of existing data, and an inspection was evaluated to determine if RECs are present in connection with the Subject Property. Based on this information, Stantec made the following findings and developed the following opinions.

- The Subject Property was either undeveloped or agricultural land until approximately the early 1940s when an outbuilding was present. The existing airport was constructed in the early 1970s.

RECs were not identified in connection with the historical use of the Subject Property.

- A card lock fueling station with two 10,000-gallon USTs containing gasoline and aviation fuel are located at the Subject Property. The USTs were installed in 1971, and the Subject Property owners have historically received several violations related to compliance monitoring of the USTs.

Based on the length of service, age of the USTs, and absence of consistent compliance monitoring, there is a potential for an undocumented release to have occurred from the USTs and/or their associated piping and dispensers, which constitutes a REC.

- The Subject Property was identified in several databases related to its USTs and a documented release in connection with the historical practice of paint stripping of airplanes at the Subject Property. Two soil samples were collected at the Subject Property. Lead impacts in soil were identified in connection with reported historical paint stripping activities at the Subject Property. Groundwater was not investigated.

The documented impacts to soil and the potential for further undocumented impacts in connection with the historical paint stripping activities constitutes a REC.

- An environmental records search was performed and identified sites within their respective ASTM E1527-21 search radii of the Subject Property that may represent RECs, CRECs, HRECs, or de minimis conditions.

Based on one or more of the following reasons: distance from the Subject Property, position of sites with respect to assumed groundwater flow direction, the type of native soils, and regulatory status, none of the nearby sites identified in the environmental records search report are expected to impact soil or groundwater quality at the Subject Property. The environmental records search did not identify RECs near the Subject Property.



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- A fire department building, operated by North Whidbey Fire and Rescue, has been located adjacent to the north of the Subject Property from approximately 1990 to present, with a firefighting training area from at least 2009 to present. Firefighting training exercises have reportedly been conducted by North Whidbey Fire and Rescue on their facility as well as at the Subject Property which may include the use of AFFF. AFFF is a common source of PFAS. North Whidbey Fire and Rescue stated that they have never used AFFF however they did not provide records to indicate past training activities on the Subject Property or other environmental records that would indicate that PFAS were not used on or adjacent to the Subject Property.

PFAS are currently classified as a family of “emerging contaminants” and are not currently identified as a hazardous substance under CERCLA. However, PFAS are regulated by Washington Department of Ecology under state hazardous waste law and the EPA anticipates finalizing PFAS regulations by the end of 2023 which may include drinking water standards. Therefore, the potential for a release in connection with the firefighting training activities on and/or adjacent to the Subject Property constitutes a BER.

7.2 DATA GAPS

The federal AAI final rule [40 CFR 312.10(a)] and ASTM E1527-21 identify a “data gap” as the lack or inability to obtain information required by the standards and practices of the rule despite good faith efforts by the EP or the User.

Any data gaps resulting from the Phase I ESA described in this report are listed and discussed below.

Gap	Discussion
Deletions or Exceptions from Scope of Work Referenced in Section 1.4:	None
Weather-Related Restrictions to Site Reconnaissance:	None
Facility Access Restrictions to Site Reconnaissance:	None
Other Site Reconnaissance Restrictions:	None
Data Gaps from Environmental Records Review:	None
Data Gaps from Historical Records Review:	Stantec did not obtain historical records that document the property history in continuous 5-year intervals, and this resulted in data gaps. These data gaps are not considered to impact the EPs ability to identify RECs.
Data Gaps from Interviews:	None
Other Data Gaps:	None



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7.3 CONCLUSIONS

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-21 of 1140 North Monroe Landing Road, Oak Harbor, Washington, or the "Subject Property." Any exceptions to, or deletions from, this practice are described Section 2.3 of this report. This assessment has revealed the following RECs in connection with the Subject Property:

- The two USTs located at the Subject Property have been in place since 1971, and the Subject Property owners have historically received several violations regarding the compliance monitoring of the USTs. Based on the length of service, age of the USTs, and absence of consistent compliance monitoring, there is a potential for an undocumented release to have occurred from the USTs and/or their associated piping and dispensers, which constitutes a REC.
- A complaint that reported paint stripping of aircraft led to two soil samples being collected at the Subject Property. Lead and cadmium impacts in soil were identified in connection with reported historical paint stripping activities at the Subject Property. Groundwater was not investigated. The documented impacts to soil and the potential for further undocumented impacts in connection with the historical paint stripping activities constitutes a REC.

In addition, the following BER has been identified for the Subject Property:

- According to North Whidbey Fire and Rescue, firefighting training activities may have been conducted on the Subject Property and there are no environmental records to indicate if the training activities utilized AFFF, which may contain PFAS. the potential for a release in connection with the firefighting training activities on and/or adjacent to the Subject Property constitutes a BER.

CRECs, HRECs, and/or significant data gaps were not identified for the Subject Property.

Stantec recommends conducting an additional investigation to evaluate the potential for impacts to soil, groundwater, and/or soil gas at the Subject Property.



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Non-Scope Considerations
May 1, 2023

8.0 NON-SCOPE CONSIDERATIONS

Based on the age of the Property buildings, building materials may contain asbestos and/or lead-based paint. Regulated building materials (RBM) assessment is not within the scope of this Phase I ESA; however, the client should be aware that special handling of these materials will be required if they are disturbed during demolition and/or redevelopment of any buildings located on the Subject Property. A regulated building materials survey would inform the client on location and quantity of materials requiring special handling.

No other ASTM E1527-21 defined “Non-Scope Considerations” were performed as part of this Phase I ESA.

