



**CITY OF RICHLAND**  
**Determination of Non-Significance**  
File No. PLN-T1-2024-00027

**Description of Proposal:** Development of a 0.36-acre site in the C-1 zone with a 500 square foot drive-through café..

**Proponent:** Clover Planning & Zoning LLC  
Attn: Shane O'Neill  
6904 Rogue Dr  
Pasco, WA 99301

**Location of Proposal:** 590 Gage Blvd is located at the northwest corner of Gage Blvd. and Leslie Drive, Richland, Washington.

**Lead Agency:** City of Richland

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

( ) There is no comment for the DNS.

( **X** ) This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for fourteen days from the date of issuance.

( ) This DNS is issued after using the optional DNS process in WAC 197-11-355. There is no further comment period on the DNS.

**Responsible Official:** Mike Stevens

**Position/Title:** Planning Manager

**Address:** 625 Swift Blvd., MS #35, Richland, WA 99352

**Date:** July 3, 2024

**Comments Due:** July 19, 2024

**Signature** \_\_\_\_\_

# SEPA<sup>1</sup> Environmental Checklist

**Commented [BL(1):** Use this template for Short Reports that are 12 pages or LESS including appendices. This type of report does not include a table of contents.

Detailed instructions are located at the end of the template if needed.

## Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

## Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use “not applicable” or “does not apply” only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

## Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

## Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in “Part B: Environmental Elements” that do not contribute meaningfully to the analysis of the proposal.

<sup>1</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance>

## A. Background

[Find help answering background questions](#)<sup>2</sup>

**1. Name of proposed project, if applicable:**

Wake-Up-Call Drive-Through Cafe

**2. Name of applicant:**

Shane O'Neill, Clover Planning & Zoning LLC

**3. Address and phone number of applicant and contact person:**

Shane O'Neill, (509)713-4560, 6904 Rogue Drive, Pasco, WA 99301

**4. Date checklist prepared:**

June 11, 2024

**5. Agency requesting checklist:**

City of Richland

**6. Proposed timing of schedule (including phasing, if applicable):**

Construction beginning 2024 and completed early 2025

**7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

No

**8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

Pre-Demolition Hazardous Materials Survey Report by PBS Engineering, dated Sept. 2023

No Further Action Opinion from Dept. of Ecology, dated July 14, 2023

**9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

A Special Use Permit application with the City of Richland is a required land use approval

**10. List any government approvals or permits that will be needed for your proposal, if known.**

A Special Use Permit application with the City of Richland is a required land use approval

**11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)**

Development of a 0.36-acre site in the C-1 zone with a 500 square foot drive-through café.

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<sup>2</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background>

Site development includes paving and landscaping.

- 12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

590 Gage Blvd is located at the northwest corner of Gage Blvd. and Leslie Drive, Richland, Washington. Site plan included herewith.

## **B.Environmental Elements**

### **1. Earth**

[Find help answering earth questions<sup>3</sup>](#)

- a. General description of the site:**

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

- b. What is the steepest slope on the site (approximate percent slope)?**

2%

- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.**

Warden very fine sandy loam, 0 to 2 percent slopes, eroded

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.**

No

- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.**

200 cubic yards, no fill, no export

- f. Could erosion occur because of clearing, construction, or use? If so, generally describe.**

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<sup>3</sup> <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth>

Wind erosion is possible.

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?**

85% impervious surfaces from the building and parking/driving asphalt

- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.**

Temporary erosion and sediment control measures include silt fencing and site watering during construction.

## 2. Air

[Find help answering air questions<sup>4</sup>](#)

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.**

Construction vehicle combustion engine emissions and customer vehicles will be generated in the short and long term. Emission cannot be reasonably quantified.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

No

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:**

Integrated vehicle emission control technologies

## 3. Water

[Find help answering water questions<sup>5</sup>](#)

- a. Surface:**

[Find help answering surface water questions<sup>6</sup>](#)

- 1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

No

<sup>4</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air>

<sup>5</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water>

<sup>6</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water>

**2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

No

**3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

None

**4. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.**

No

**5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

No

**6. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

No

**b. Ground:**

[Find help answering ground water questions<sup>7</sup>](#)

**1. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.**

No

**2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

None

**c. Water Runoff (including stormwater):**

**1. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

Stormwater will be capture and infiltrated on-site using infiltration trench(es).

<sup>7</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater>

2. Could waste materials enter ground or surface waters? If so, generally describe.

No

3. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

Stormwater will be capture and infiltrated on-site using infiltration trench(es).

#### 4. Plants

[Find help answering plants questions](#)

a. Check the types of vegetation found on the site:

- deciduous tree: alder, maple, aspen, other
- evergreen tree: fir, cedar, pine, other
- shrubs
- grass
- pasture
- crop or grain
- orchards, vineyards, or other permanent crops.
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

None

c. List threatened and endangered species known to be on or near the site.

None

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.

Locally available trees, grasses and shrubs will be planted along both frontages.

e. List all noxious weeds and invasive species known to be on or near the site.

The site lacks vegetation.

## 5. Animals

[Find help answering animal questions](#)<sup>8</sup>

- a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.

Examples include:

- Birds: hawk, heron, eagle, songbirds, other:
- Mammals: deer, bear, elk, beaver, other:
- Fish: bass, salmon, trout, herring, shellfish, other:

none

- b. List any threatened and endangered species known to be on or near the site.

none

- c. Is the site part of a migration route? If so, explain.

Richland lies within the Pacific Flyway

- d. Proposed measures to preserve or enhance wildlife, if any.

None

- e. List any invasive animal species known to be on or near the site.

None

## 6. Energy and natural resources

[Find help answering energy and natural resource questions](#)<sup>9</sup>

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Electric for air heating and cooling and for water heating

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.

2021 WSEC construction compliance

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<sup>8</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals>

<sup>9</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou>



## 7. Environmental health

[Health Find help with answering environmental health questions](#)<sup>10</sup>

- a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.**

No

1. **Describe any known or possible contamination at the site from present or past uses.**

Underground fuel storage tanks have been removed. HazMat report included herewith.

2. **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

None affecting site design. Soil remediation is complete.

3. **Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

None

4. **Describe special emergency services that might be required.**

Police, fire, ambulance

5. **Proposed measures to reduce or control environmental health hazards, if any.**

OSHA protocol compliance, sewer connection

### b. Noise

1. **What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

None

2. **What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

Passenger vehicle idling noise will be cloaked by the traffic noise associated with the adjacent signalized road intersection.

3. **Proposed measures to reduce or control noise impacts, if any:**

Mitigation measures are not warranted.

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<sup>10</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health>

## 8. Land and shoreline use

[Find help answering land and shoreline use questions](#)<sup>11</sup>

- a. **What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

Site – vacant

North – Commercial

West – Commercial

East – Medical Clinic

South – Commercial

The proposed café will not impact the surrounding land uses

- b. **Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

No

1. **Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

No

- c. **Describe any structures on the site.**

None

- d. **Will any structures be demolished? If so, what?**

No

- e. **What is the current zoning classification of the site?**

C-1 (Neighborhood Retail)

- f. **What is the current comprehensive plan designation of the site?**

Commercial

- g. **If applicable, what is the current shoreline master program designation of the site?**

NA

- h. **Has any part of the site been classified as a critical area by the city or county? If so, specify.**

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<sup>11</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use>

No

- i. **Approximately how many people would reside or work in the completed project?**

Approximately 5 employees

- j. **Approximately how many people would the completed project displace?**

Zero

- k. **Proposed measures to avoid or reduce displacement impacts, if any.**

None warranted

- l. **Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.**

Zoning code review and compliance

- m. **Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:**

None warranted

## 9. Housing

[Find help answering housing questions](#)<sup>12</sup>

- a. **Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.**

Zero

- b. **Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

Zero

- c. **Proposed measures to reduce or control housing impacts, if any:**

None warranted

## 10. Aesthetics

[Find help answering aesthetics questions](#)<sup>13</sup>

- a. **What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

Up to fifteen foot tall structure. Stucco, metal and Hardi-board

- b. **What views in the immediate vicinity would be altered or obstructed?**

None

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<sup>12</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing>

<sup>13</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics>

**c. Proposed measures to reduce or control aesthetic impacts, if any:**

Franchise design requirements ensure attractive outward appearance.

## 11. Light and glare

[Find help answering light and glare questions](#)<sup>14</sup>

**a. What type of light or glare will the proposal produce? What time of day would it mainly occur?**

Parking lot lighting

**b. Could light or glare from the finished project be a safety hazard or interfere with views?**

No

**c. What existing off-site sources of light or glare may affect your proposal?**

None

**d. Proposed measures to reduce or control light and glare impacts, if any:**

Outdoor lighting will be shielded from the horizontal plane to eliminate light trespass.

## 12. Recreation

[Find help answering recreation questions](#)

**a. What designated and informal recreational opportunities are in the immediate vicinity?**

A municipal linear park containing a pathway and lawn is located 600 feet to the north.

**b. Would the proposed project displace any existing recreational uses? If so, describe.**

No

**c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

Mitigation measures are not warranted.

## 13. Historic and cultural preservation

[Find help answering historic and cultural preservation questions](#)<sup>15</sup>

**a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

No

**b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material**

<sup>14</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare>

<sup>15</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p>

evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

No

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

Visual surface inspection. The site was previously excavated, and soil replace to remediate contamination from underground fuel storage tanks.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

Excavation will cease if artifacts are uncovered. Local Tribes and DAHP will be consulted immediately for further direction.

#### 14. Transportation

[Find help with answering transportation questions](#)<sup>16</sup>

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

Leslie Road and Gage Blvd provide direct access to the site. Roads appear on the site plan.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

Gage and Leslie belong to Ben-Franklin Transit bus routes

- c. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

No. Adjacent roads are fully developed.

- d. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No

- e. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

<sup>16</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation>

Coffee/Donut Shop with Drive-Through, No Indoor Seating Land Use Code 938

According to the 11<sup>th</sup> Edition of the ITE Trip Generation Manual, the café will generate approximately 176 vehicle trips per day.

- f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

No

- g. **Proposed measures to reduce or control transportation impacts, if any:**

Driveway approaches have been setback from the road intersection to the maximum extend feasible.

## 15. Public services

[Find help answering public service questions<sup>17</sup>](#)

- a. **Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.**

Reasonably, no.

- b. **Proposed measures to reduce or control direct impacts on public services, if any.**

Mitigation measures are not warranted.

## 16. Utilities

[Find help answering utilities questions<sup>18</sup>](#)

- a. **Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:**

- b. **Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.**

Connections will be made to the existing municipal sewer, water and power stubs.

## C. Signature


[Find help about who should sign<sup>19</sup>](#)

**The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.**

<sup>17</sup> <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services>

<sup>18</sup> <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities>

<sup>19</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature>

 Recoverable Signature

**X** Shane O'Neill

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Signed by: fbf29b3f-4f80-4177-a46d-39faa088cdc4

**Type name of signee:** Shane O'Neill

**Position and agency/organization:** Senior Planner, Clover Planning & Zoning Land Use Consultant.

**Date submitted:** 6/11/2024

## D. Supplemental sheet for nonproject actions

[Find help for the nonproject actions worksheet<sup>20</sup>](#)

**Do not** use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

- 1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?**
  - **Proposed measures to avoid or reduce such increases are:**
  
- 2. How would the proposal be likely to affect plants, animals, fish, or marine life?**
  - **Proposed measures to protect or conserve plants, animals, fish, or marine life are:**
  
- 3. How would the proposal be likely to deplete energy or natural resources?**
  - **Proposed measures to protect or conserve energy and natural resources are:**

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<sup>20</sup> <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions>

**4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?**

- Proposed measures to protect such resources or to avoid or reduce impacts are:

**5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?**

- Proposed measures to avoid or reduce shoreline and land use impacts are:

**6. How would the proposal be likely to increase demands on transportation or public services and utilities?**

- Proposed measures to reduce or respond to such demand(s) are:

**7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.**







STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

July 14, 2023

Hal Hatfield  
Circle K Stores Inc.  
1120 W. Warner Road  
Tempe, AZ 85284

**Re: No Further Action Opinion for the Following Contaminated Site:**

- **Site Name:** Circle K 6032
- **Site Address:** 590 Gage Boulevard, Richland
- **Facility/Site ID:** 95512514
- **Cleanup Site ID:** 14973
- **VCP Project No.:** CE0538

Dear Hal Hatfield:

The Washington State Department of Ecology (Ecology) received your request on July 26, 2022 for an opinion regarding the sufficiency of your independent cleanup of the Circle K 6032 facility (Site) under the Voluntary Cleanup Program (VCP).<sup>1</sup> To provide an opinion, we requested additional information from you in writing on February 9, 2023. We received the additional information on May 17, 2023. This letter provides our opinion and analysis. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.<sup>2</sup>

## Opinion

Ecology has determined that no further remedial action is necessary to clean up contamination at the Site.

Ecology bases this opinion on an analysis of whether the remedial action meets the substantive requirements of MTCA and its implementing regulations, which are specified in Chapter 70A.305 RCW and Chapter 173-340 WAC<sup>3</sup> (collectively called "MTCA").

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<sup>1</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Voluntary-Cleanup-Program>

<sup>2</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305>

<sup>3</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340>

## Site Description

This opinion applies only to the Site described below. The Site is defined by the nature and extent of contamination associated with the following release(s):

- Lead in groundwater
- Arsenic in groundwater

The no further action provided by The Pollution Liability Insurance Agency (PLIA) on December 29, 2021 only applies to the petroleum contamination at the Site. PLIA's letter specified that further remedial action is necessary regarding residual metals in groundwater. This letter does not refute the previous opinion and is only meant to provide a determination regarding the residual metals.

The enclosure includes a Site description and diagram.

Please note that releases from multiple sites can affect a parcel of real property. At this time, data indicates this parcel may be affected by contamination from another unknown site.

## Basis for the Opinion

Ecology bases this opinion on the information contained in the following documents:

- Blaes Environmental, Groundwater Monitoring Report, June 13, 2022
- Pollution Liability Insurance Agency, Noe Further Action Letter, December 29, 2021

You can request these documents by filing a records request.<sup>4</sup> For help making a request, contact the Public Records Officer at [RecordsOfficer@ecy.wa.gov](mailto:RecordsOfficer@ecy.wa.gov) or call (360) 407-6040. Before making a request, check if the documents are available on the Circle K 6032 cleanup site page.<sup>5</sup>

This opinion is void if information in any of the listed documents is materially false or misleading.

## Analysis of the Cleanup

Ecology has concluded that no further remedial action is necessary to clean up contamination at the Site. Ecology bases its conclusion on the following analysis:

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<sup>4</sup> <https://ecology.wa.gov/About-us/Accountability-transparency/Public-records-requests>

<sup>5</sup> <https://apps.ecology.wa.gov/cleanupsearch/site/14973#site-documents>

### **Characterizing the Site**

Ecology has determined your completed Site characterization is sufficient for setting cleanup standards and selecting a cleanup action. The enclosure describes the Site.

Filtered groundwater data indicates the existence of an offsite source for the residual metal contamination within groundwater. Ecology has determined that the site is not a source for the metal contamination found within the groundwater. Groundwater concentrations are highest upgradient of the tank nest and the contamination decreases in the downgradient direction across the site.

### **Setting cleanup standards**

Due to Ecology's determination cleanup levels and points of compliance are not necessary for metals at the Site.

### **Selecting the cleanup action**

Due to Ecology's determination a cleanup action is not required to address the metals at the Site.

You must decommission resource protection wells<sup>6</sup> installed as part of the remedial action that are not needed for any other purpose at the Site. Wells must be decommissioned in accordance with WAC 173-160-460.<sup>7</sup>

### **Listing of the Site**

Based on this opinion, Ecology will update the Site status on the Confirmed and Suspected Contaminated Sites List and the Leaking Underground Storage Tanks List.

### **Limitations of the Opinion**

#### **Opinion does not settle liability with the state**

Liable persons are strictly liable, jointly, and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Site. This opinion does not:

- Resolve or alter a person's liability to the state.
- Protect liable persons from contribution claims by third parties.

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<sup>6</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-410>

<sup>7</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-160-460>

Hal Hatfield  
Circle K Stores Inc.  
July 14, 2023  
Page 4

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70A.305.040(4).<sup>8</sup>

### **Opinion does not constitute a determination of substantial equivalence**

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine if the action you performed is substantially equivalent. Courts make that determination. See RCW 70A.305.080<sup>9</sup> and WAC 173-340-545.<sup>10</sup>

### **State is immune from liability**

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70A.305.170(6).<sup>11</sup>

### **Termination of Agreement**

Thank you for cleaning up the Site under the VCP. This opinion terminates the VCP Agreement governing VCP Project No. CE0538.

### **Questions**

If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at (509) 406-6959 or email at [Kyle.Parker@ecy.wa.gov](mailto:Kyle.Parker@ecy.wa.gov).

Sincerely,



Kyle Parker  
Toxics Cleanup Program  
Central Regional Office

Enclosure: Site Description and Diagram

cc: Dan Blaes, Blaes Environmental Inc.  
Fiscal, VCP Fiscal Analyst  
TCP, Operating Budget Analyst

---

<sup>8</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.040>

<sup>9</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.080>

<sup>10</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-340-545>

<sup>11</sup> <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.305.170>

# Enclosure

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Site Description and Diagram



## **Site Description**

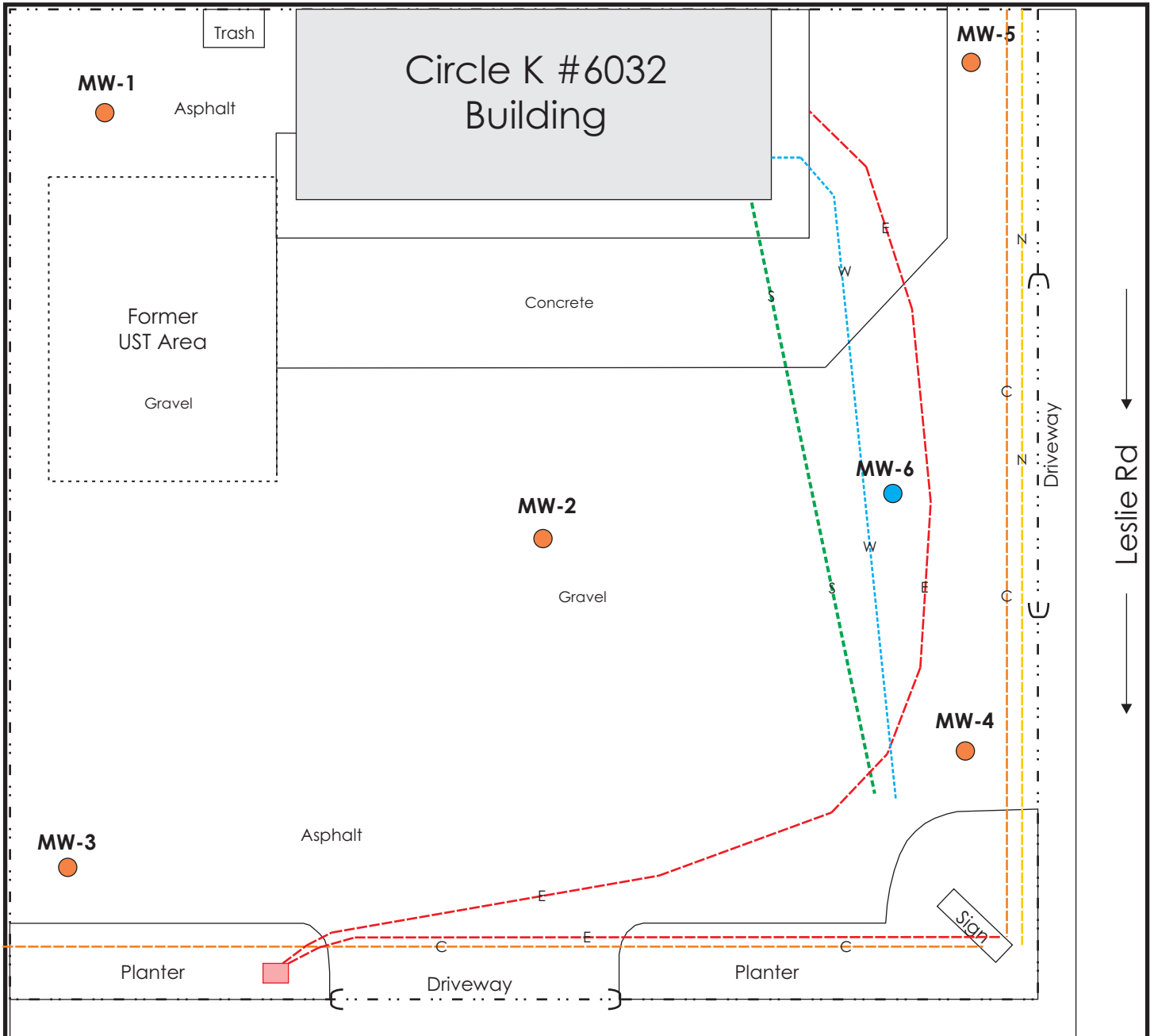
The Site is located on the northwest corner of the intersection of West Gage Boulevard and Leslie Road in Richland, Washington. The area surrounding the site consists of a combination of commercial businesses and residential developments. The site formerly housed four underground storage tanks and six fuel dispensers. Gasoline, diesel, and heavy oil contamination was identified in soil, groundwater, and vapor during the removal and decommissioning of the underground storage tanks. Lead and Arsenic were noted in groundwater but not in soils. Additional investigation indicates an offsite source and that the site is not a source for the Lead and Arsenic found within the groundwater.







## Site Diagram





**Legend**

-  **MW-3** Groundwater Monitoring Well Location
-  **MW-6** Proposed Groundwater Monitoring Well Location



Approximate Scale  
1 inch = 20 feet



Circle K #6032  
590 Gage Boulevard  
Richland, Washington

**WELL LOCATIONS**

Project #202-6032-06

Figure  
2

# **Pre-Demolition Hazardous Materials Survey Report**

Former Circle K  
590 Gage Boulevard  
Richland, Washington 99352

Prepared for:  
Lance Bacon  
Kiemle Hagood  
7025 W Grandridge Boulevard Suite B2  
Kennewick, Washington 99336

September 2023  
PBS Project 63275.001



400 BRADLEY BOULEVARD, SUITE 106  
RICHLAND, WA 99352  
509.942.1600 MAIN  
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PBSUSA.COM

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### APPENDICES

#### APPENDIX A: PLM Bulk Sampling Information

PLM Bulk Sample Inventory  
PLM Bulk Sample Laboratory Data Sheets and Chain of Custody Documentation

#### APPENDIX B: AA Lead Paint Chip Sampling Information

AA Lead Paint Chip Sample Inventory  
AA Lead Paint Chip Laboratory Data Sheets and Chain of Custody Documentation

#### APPENDIX C: Certifications

## 1 INTRODUCTION

### 1.1 Project Background

On September 11, 2023, PBS performed a pre-demolition hazardous materials survey of the facility located at 590 Gage Boulevard in Richland, Washington. The survey was requested by Kiemle Hagood in anticipation of demolition.

The purpose of the survey was to locate, identify, and quantify accessible friable and non-friable asbestos-containing building materials and lead-based paint materials for removal prior to demolition.

The survey is also intended to satisfy Washington State Department of Labor and Industries (L&I) requirements in Washington Administrative Code (WAC) 296-62-07721 and Benton Clean Air Agency (BCAA) requirements in Article 8 to perform an asbestos survey prior to demolition or renovation.

### 1.2 Building Descriptions

The facility is a single-story structure. The building includes a restroom, office space, janitorial closet, and central open area. Interior floor finishes include vinyl floor tile, and ceramic tile. The walls are gypsum, with select areas that are finished. The ceilings include lay-in ceiling tile and select areas of gypsum.

The windows throughout the building are predominantly aluminum-framed windows. The exterior is finished with stone masonry and wood siding. The roofing is a built-up asphalt roofing system.

### 1.3 Survey Process

Accessible areas included in the project scope were inspected by AHERA Certified Building Inspectors Justin Ware (Cert. No. IMR-23-5145B Exp. 02/13/2024) and Cienna Landon (Cert. No. IMR-23-0507C EXP. 06/20/2023) on September 11, 2023. PBS endeavored to inspect all accessible areas of the scope of work. Inaccessible areas consist of those requiring selective demolition, fall protection, or confined space entry protocols to gain access.

When observed, suspect materials were sampled. All samples were assigned a unique identification number and transmitted to the appropriate laboratory for analysis. See section 2 for findings.

## 2 ASBESTOS SUMMARY

### 2.1 Asbestos-Containing Materials (ACMs)

The building was inspected by PBS Asbestos Hazard Emergency Response Act (AHERA) accredited inspectors to determine the presence, location, and approximate quantity of asbestos-containing materials (ACMs). Forty (40) bulk samples of building materials, suspected of containing asbestos, were collected and submitted under chain of custody to SGS Forensic Laboratories of Hayward, California (NVLAP Lab Code: 101459-0), for polarized light microscopy (PLM) analysis. Suspect ACMs may exist in inaccessible areas. PBS endeavored to determine the presence and estimate the condition of suspect materials in all inaccessible areas included in the scope of work. While PBS has endeavored to identify ACMs that may be found in concealed locations, additional unidentified ACMs may exist. A regulated asbestos-containing material is defined as containing greater than 1% asbestos content. No samples were found to contain regulated amounts of asbestos.

The following materials were determined **not to contain asbestos**:

- Gypsum Wallboard/Joint Compound Wall and Ceiling Systems – Throughout Building
- Ceramic Tile and Grout – Throughout Building
- Vinyl Floor Tile and Mastic – Throughout Building
- Covebase and Mastic – Throughout Building
- Lay-In Ceiling Tile – Throughout Building
- Caulking – Throughout Building
- FRP Mastic – Throughout Restroom
- CMU Block and Mortar – North Exterior Wall
- Leveling Compound – Exterior Sidewalk
- Built-Up Roofing – Throughout Roof
- Sealant – Throughout Roof
- Roof Flashing – Throughout Roof

For a complete listing of representative bulk sampling and associated laboratory analysis, refer to the attachments, Appendix A.

## 2.2 Asbestos Regulations

WAC 296-62-077 requires proper removal and handling of ACM by licensed and trained asbestos abatement contractors prior to building renovation or demolition.

Regulations define ACM as any material containing more than 1% asbestos. Although materials with <1% asbestos are not considered by regulatory agencies to be an ACM, they still have some asbestos content, and WAC has specific requirements for situations in which workers may encounter, disturb, or remove materials containing any concentration of asbestos. For the sake of hazard communication, these materials are included in the asbestos-containing materials section of this report.

L&I does require training for workers who impact materials with any amount of asbestos if that impact could result in airborne fiber concentrations over the permissible exposure limit (PEL) of 0.1 fibers per cubic centimeter (f/cc) of air.

The EPA defines ACM as “any material containing more than one percent asbestos.” PBS recommends that all ACM to be impacted by the planned demolition be removed and disposed of by a Washington State certified asbestos abatement contractor in accordance with all local, state, and federal regulations. Impact of ACM should be performed according to Washington Industrial Safety and Health Act (WISHA) requirements, including WACs 296-62 and 296-65. Proper worker training, personal protective equipment, engineering controls, and housekeeping procedures must be utilized as required.

OSHA provides federal regulations governing asbestos (29 CFR Part 1926, 1101). These regulations detail work procedures and how ACM is removed. OSHA believes that the single biggest problem is to workers who unknowingly or improperly disturb ACM. Hazard communication, training, personal protection, work practices, exposure monitoring, and recordkeeping are all major components of the regulation. Work impacting asbestos is subject to the requirements of various regulations, including, but not limited to 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAPS); 40 CFR Part 763, AHERA; WAC 296-62 and 296-65; and local clean air agency regulations.

BCAA and L&I regulations require proper removal and handling of ACM by licensed and trained asbestos abatement contractors prior to building renovations or demolition.



The BCAA and L&I both define ACM as any material containing more than 1% asbestos. Although materials equal to or less than one percent are not considered by regulatory agencies to be an ACM, they still have some asbestos content, and L&I has requirements for situations in which workers may encounter, disturb, or remove materials containing any level of asbestos.

WAC 296-62-07721 describes work procedures and how asbestos materials are managed. The single biggest risk of asbestos exposure is to workers who unknowingly or improperly disturb ACM. Hazard communication, training, personal protection, work practices, exposure monitoring, and recordkeeping are all major components of the regulation.

BCAA and L&I also cover asbestos abatement requirements, removal notifications, licensing, and certifications for contractors.

For more information regarding the removal of asbestos-containing materials, please refer to the following:

1. L&I, WAC 296-62-077
2. BCAA, Article 8

### 3 LEAD SUMMARY

#### 3.1 Lead-Containing Components

Paint was sampled for lead content for the sake of hazard communication. The table below summarizes lead findings in paint sampled on site.

Paint Color	Substrate	Location	Result % by Weight	BRL, LCP or LBP
Black and Gray Layered Paint	Cement/Concrete	East Exterior Sidewalk	<0.006	BRL
Brown Paint	Wood	South Exterior Siding	<0.006	BRL
White Paint	Wood	South Exterior Siding	<0.006	BRL
Red Paint	Wood	South Exterior Siding	<0.006	BRL
Yellow Paint	Gypsum Wallboard	North Interior Wall	<0.007	BRL
Blue paint	Gypsum Wallboard	East Interior Wall	<0.007	BRL
Light Brown Paint	Gypsum Wallboard	North Interior Wall	<0.006	BRL

BRL = Below Reportable Limits

LCP = Lead-containing-paint 0.006 % – 0.499 % (less than 5,000 ppm)

LBP = Lead-based-paint 0.5 % by weight or more (5,000 ppm or more)

Seven (7) paint chip samples were collected from representative building components from the building interior and exterior and submitted under chain of custody to SGS Forensic Laboratories, Hayward California (AIHA-LAP Lab ID #101762), for analysis of lead content via flame atomic absorption (FLAA). The concentration of lead in the samples were all below regulated action levels.

See the lead sample inventory section for representative building components and corresponding results.

Paint testing for this survey was limited in scope. The report information and testing results are not to be construed as an exhaustive investigation of lead-containing paint on all building surfaces. All paint on painted surfaces not identified in this report should be presumed to contain lead.

### 3.2 Lead-Containing Paint Regulations

The Consumer Product Safety Commission limit for lead in consumer paint products is 0.009% or 90 ppm or greater. The Department of Housing and Urban Development (HUD) and the EPA define lead-based paint as that which contains 0.5% or 5,000 ppm. Under L&I, any lead concentration in paint that may become airborne during construction operations triggers requirements in the Lead in Construction Standard WAC 296-155-176 to protect employees impacting the paint.

## 4 LIMITATIONS

This study was limited to the tests, locations and depths as indicated to determine the absence or presence of certain contaminants. The site as a whole may have other contamination that was not characterized by this study. The findings and conclusions of this report are not scientific certainties, but rather probabilities based on professional judgment concerning the significance of the data gathered during this investigation.

Please do not hesitate to contact us if you have any questions regarding this report or require additional information.

Report prepared by:  
Cienna Landon  
Industrial Hygiene Inspector  
Cert. # IMR-23-0507C, exp. 6/20/2024

Report reviewed by:  
Justin Ware  
Project Manager  
Cert. #IMR-22-8648B, exp. 2/13/2024

---

Signature

Date

---

Signature

Date

## **APPENDIX A**

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### **PLM Bulk Sampling Information**

PLM Bulk Sample Inventory

PLM Bulk Sample Laboratory Data Sheets

PLM Bulk Sample Chain of Custody Documentation



400 BRADLEY BOULEVARD, SUITE 106, RICHLAND, WA 99352  
509.942.1600 MAIN ■ 866.727.0140 FAX ■ WWW.PBSUSA.COM

Sample No.	Material Type	Sample Location	Layer	Lab Description	Lab Result	Lab
0001	Ceramic Tile and Grout	Center of Building	1	Grey Ceramic Tile	ND	SGS
			2	Grey Grout	ND	SGS
			3	Grey Mortar	ND	SGS
0002	Ceramic Tile and Grout	Center of Building	1	Grey Ceramic Tile	ND	SGS
			2	Grey Grout	ND	SGS
			3	Grey Mortar	ND	SGS
0003	Ceramic Tile and Grout	Center of Building	1	Grey Ceramic Tile	ND	SGS
			2	Grey Grout	ND	SGS
			3	Grey Mortar	ND	SGS
0004	Vinyl floor Tile and Mastic	Center of Building	1	Off-White Tile	ND	SGS
			2	Yellow Mastic	ND	SGS
			3	White Non-Fibrous Material	ND	SGS
0005	Vinyl floor Tile and Mastic	Center of Building	1	Off-White Tile	ND	SGS
			2	Yellow Mastic	ND	SGS
			3	White Non-Fibrous Material	ND	SGS
0006	Vinyl floor Tile and Mastic	Center of Building	1	Off-White Tile	ND	SGS
			2	Yellow Mastic	ND	SGS
			3	White Non-Fibrous Material	ND	SGS
0007	Covebase and Mastic	North Wall	1	Black Non-Fibrous Material	ND	SGS
			2	Brown Mastic	ND	SGS
0008	Covebase and Mastic	North Wall	1	Black Non-Fibrous Material	ND	SGS
			2	Brown Mastic	ND	SGS
0009	Covebase and Mastic	North Wall	1	Black Non-Fibrous Material	ND	SGS
			2	Brown Mastic	ND	SGS
0010	Lay-In Ceiling Tile	Center of Building	1	Grey Fibrous Material	ND	SGS
			2	Paint	ND	SGS
0011	Lay-In Ceiling Tile	Center of Building	1	Grey Fibrous Material	ND	SGS
			2	Paint	ND	SGS



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Sample No.	Material Type	Sample Location	Layer	Lab Description	Lab Result	Lab
0012	Lay-In Ceiling Tile	Center of Building	1	Grey Fibrous Material	ND	SGS
			2	Paint	ND	SGS
0013	Gypsum Board/Joint Compound	Ceiling - North Area of Building	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS
			3	Paint	ND	SGS
0014	Gypsum Board/Joint Compound	Ceiling - Restroom	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS
			3	Paint	ND	SGS
0015	Gypsum Board/Joint Compound	Ceiling - Restroom	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS
			3	Paint	ND	SGS
0016	Gypsum Board/Joint Compound	Wall - West Corner of Building	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS
			3	Paint	ND	SGS
0017	Gypsum Board/Joint Compound	Wall - West Corner of Building	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS
			3	Paint	ND	SGS
0018	Gypsum Board/Joint Compound	Wall - West Corner of Building	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS
			3	Paint	ND	SGS
0019	Gypsum Board/Joint Compound	Wall - North side of Building	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS
			3	Paint	ND	SGS
0020	Gypsum Board/Joint Compound	Wall - North side of Building	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS
			3	Paint	ND	SGS
0021	Gypsum Board/Joint Compound	Wall - South	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS



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Sample No.	Material Type	Sample Location	Layer	Lab Description	Lab Result	Lab
			3	Paint	ND	SGS
0022	Gypsum Board/Joint Compound	Wall - Outside Office	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS
			3	Paint	ND	SGS
0023	Gypsum Board/Joint Compound	Wall - Outside Restroom	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS
			3	Paint	ND	SGS
0024	Gypsum Board/Joint Compound	Wall - Outside Janitorial Closet	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS
			3	Paint	ND	SGS
0025	Gypsum Board/Joint Compound	Wall - Office	1	White Drywall	ND	SGS
			2	White Joint Compound	ND	SGS
			3	Paint	ND	SGS
0026	Caulk	Concrete Floor - West	1	Grey Non-Fibrous Material	ND	SGS
0027	Caulk	Concrete Floor - West	1	Grey Non-Fibrous Material	ND	SGS
0028	Caulk	Concrete Floor - West	1	Grey Non-Fibrous Material	ND	SGS
0029	Caulk	Sink Backsplash	1	Clear Non-Fibrous Material	ND	SGS
0030	Caulk	Sink Backsplash	1	Clear Non-Fibrous Material	ND	SGS
0031	Caulk	Sink Backsplash	1	Clear Non-Fibrous Material	ND	SGS
0032	FRP Mastic	Restroom Wall	1	Yellow Mastic	ND	SGS
			2	Paint	ND	SGS
			3	White Texture	ND	SGS
0033	FRP Mastic	Restroom Wall	1	Yellow Mastic	ND	SGS
			2	Paint	ND	SGS
			3	White Texture	ND	SGS
0034	FRP Mastic	Restroom Wall	1	Yellow Mastic	ND	SGS
			2	Paint	ND	SGS
			3	White Texture	ND	SGS



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Sample No.	Material Type	Sample Location	Layer	Lab Description	Lab Result	Lab
0035	<b>CMU Block and Mortar</b>	North Exterior Wall	1	Grey Cementitious Material	ND	SGS
			2	Grey Mortar	ND	SGS
0036	<b>Leveling Compound</b>	East Exterior Sidewalk	1	White Non-Fibrous Material	ND	SGS
			2	Paint	ND	SGS
0037	<b>Roof Flashing</b>	Center of Roof	1	Stones	ND	SGS
			2	Black Tar	ND	SGS
			3	Black Felt	ND	SGS
			4	Silver Foil	ND	SGS
0038	<b>Flashing Sealant</b>	Center of Roof	1	Black Non-Fibrous Material	ND	SGS
			2	Off-White Coating	ND	SGS
0039	<b>Sealant</b>	Northwest Corner of Roof	1	Black Non-Fibrous Material	ND	SGS
0040	<b>Built Up Roofing</b>	Northwest Corner of Roof	1	Black Felt	ND	SGS
			2	Black Tar	ND	SGS
			3	Black Felt	ND	SGS
			4	Black Tar	ND	SGS
			5	Black Felt	ND	SGS
			6	Black Tar	ND	SGS



# Bulk Asbestos Analysis

(EPA Method 40CFR, Part 763, Appendix E to Subpart E and EPA 600/R-93-116, Visual Area Estimation)

NVLAP Lab Code: 101459-0

PBS Engineering & Environmental Inc.  
Kanani Young  
400 Bradley Blvd.  
Suite 106  
Richland, WA 99352

**Client ID:** L2129  
**Report Number:** B351757  
**Date Received:** 09/12/23  
**Date Analyzed:** 09/12/23  
**Date Printed:** 09/12/23  
**First Reported:** 09/12/23

**Job ID/Site:** 63275.001 - Pre-Demolition Hazardous Materials Survey 590 Gage Blvd Richland WA

**SGSFL Job ID:** L2129  
**Total Samples Submitted:** 40  
**Total Samples Analyzed:** 40

**Date(s) Collected:**

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
<b>0001</b>	12692837						
Layer: Grey Ceramic Tile			ND				
Layer: Grey Grout			ND				
Layer: Grey Mortar			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0002</b>	12692838						
Layer: Grey Ceramic Tile			ND				
Layer: Grey Grout			ND				
Layer: Grey Mortar			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0003</b>	12692839						
Layer: Grey Ceramic Tile			ND				
Layer: Grey Grout			ND				
Layer: Grey Mortar			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0004</b>	12692840						
Layer: Off-White Tile			ND				
Layer: Yellow Mastic			ND				
Layer: White Non-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0005</b>	12692841						
Layer: Off-White Tile			ND				
Layer: Yellow Mastic			ND				
Layer: White Non-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							



Client Name: PBS Engineering & Environmental Inc.

Report Number: B351757

Date Printed: 09/12/23

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
<b>0006</b>	12692842						
Layer: Off-White Tile			ND				
Layer: Yellow Mastic			ND				
Layer: White Non-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0007</b>	12692843						
Layer: Black Non-Fibrous Material			ND				
Layer: Brown Mastic			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0008</b>	12692844						
Layer: Black Non-Fibrous Material			ND				
Layer: Brown Mastic			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0009</b>	12692845						
Layer: Black Non-Fibrous Material			ND				
Layer: Brown Mastic			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0010</b>	12692846						
Layer: Grey Fibrous Material			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (35 %) Fibrous Glass (45 %)							
<b>0011</b>	12692847						
Layer: Grey Fibrous Material			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (35 %) Fibrous Glass (45 %)							
<b>0012</b>	12692848						
Layer: Grey Fibrous Material			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (35 %) Fibrous Glass (45 %)							
<b>0013</b>	12692849						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %) Fibrous Glass (10 %)							

Client Name: PBS Engineering & Environmental Inc.

Report Number: B351757

Date Printed: 09/12/23

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
<b>0014</b>	12692850						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %)	Fibrous Glass (10 %)						
<b>0015</b>	12692851						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %)	Fibrous Glass (10 %)						
<b>0016</b>	12692852						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %)	Fibrous Glass (10 %)						
<b>0017</b>	12692853						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %)	Fibrous Glass (10 %)						
<b>0018</b>	12692854						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %)	Fibrous Glass (10 %)						
<b>0019</b>	12692855						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %)	Fibrous Glass (10 %)						
<b>0020</b>	12692856						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %)	Fibrous Glass (10 %)						

Client Name: PBS Engineering & Environmental Inc.

Report Number: B351757

Date Printed: 09/12/23

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
<b>0021</b>	12692857						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %)	Fibrous Glass (10 %)						
<b>0022</b>	12692858						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %)	Fibrous Glass (10 %)						
<b>0023</b>	12692859						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %)	Fibrous Glass (10 %)						
<b>0024</b>	12692860						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %)	Fibrous Glass (10 %)						
<b>0025</b>	12692861						
Layer: White Drywall			ND				
Layer: White Joint Compound			ND				
Layer: Paint			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (20 %)	Fibrous Glass (10 %)						
<b>0026</b>	12692862						
Layer: Grey Non-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0027</b>	12692863						
Layer: Grey Non-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0028</b>	12692864						
Layer: Grey Non-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							

Client Name: PBS Engineering & Environmental Inc.

Report Number: B351757

Date Printed: 09/12/23

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
<b>0029</b>	12692865						
Layer: Clear Non-Fibrous Material			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0030</b>	12692866						
Layer: Clear Non-Fibrous Material			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0031</b>	12692867						
Layer: Clear Non-Fibrous Material			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0032</b>	12692868						
Layer: Yellow Mastic			<b>ND</b>				
Layer: Paint			<b>ND</b>				
Layer: White Texture			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0033</b>	12692869						
Layer: Yellow Mastic			<b>ND</b>				
Layer: Paint			<b>ND</b>				
Layer: White Texture			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0034</b>	12692870						
Layer: Yellow Mastic			<b>ND</b>				
Layer: Paint			<b>ND</b>				
Layer: White Texture			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0035</b>	12692871						
Layer: Grey Cementitious Material			<b>ND</b>				
Layer: Grey Mortar			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0036</b>	12692872						
Layer: White Non-Fibrous Material			<b>ND</b>				
Layer: Paint			<b>ND</b>				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							

Client Name: PBS Engineering & Environmental Inc.

Report Number: B351757

Date Printed: 09/12/23

Sample ID	Lab Number	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer	Asbestos Type	Percent in Layer
<b>0037</b>	12692873						
Layer: Stones			ND				
Layer: Black Tar			ND				
Layer: Black Felt			ND				
Layer: Silver Foil			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (40 %)	Fibrous Glass (35 %)						
<b>0038</b>	12692874						
Layer: Black Non-Fibrous Material			ND				
Layer: Off-White Coating			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (Trace)							
<b>0039</b>	12692875						
Layer: Black Non-Fibrous Material			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (10 %)							
<b>0040</b>	12692876						
Layer: Black Felt			ND				
Layer: Black Tar			ND				
Layer: Black Felt			ND				
Layer: Black Tar			ND				
Layer: Black Felt			ND				
Layer: Black Tar			ND				
Total Composite Values of Fibrous Components:		<b>Asbestos (ND)</b>					
Cellulose (55 %)	Fibrous Glass (10 %)						
Comment: Bulk complex sample.							

Maria Casper, Laboratory Supervisor, Hayward Laboratory

Note: Limit of Quantification ('LOQ') = 1%. 'Trace' denotes the presence of asbestos below the LOQ. 'ND' = 'None Detected'.

Analytical results and reports are generated by SGS Forensic Laboratories (SGSFL) at the request of and for the exclusive use of the person or entity (client) named on such report. Results, reports or copies of same will not be released by SGSFL to any third party without prior written request from client. This report applies only to the sample(s) tested. Supporting laboratory documentation is available upon request. This report must not be reproduced except in full, unless approved by SGSFL. The client is solely responsible for the use and interpretation of test results and reports requested from SGSFL. This report must not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government. SGSFL is not able to assess the degree of hazard resulting from materials analyzed. SGS Forensic Laboratories reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified. All samples were received in acceptable condition unless otherwise noted.



Project Name/Scope: Pre-Demolition Hazardous Materials Survey PDS Project No. 63275.001  
 Project Address: 590 Gage Blvd, Richland, WA Proj. Date: 9/11/23 Temp: 70°  
 Client Name/POC: Kiemle Proj. Manager: Justin Ware Sampled By: Justin Ware  
Hagood

Send Samples to:

- Lab Cor Inc. Seattle  
7619 6th Ave. NW  
Seattle WA 98117
- RJ Lee Group (TCLP-RCRA8)  
350 Hochberg Rd.  
Monroeville PA 15146
- SGS / Galson - Vegas (PLM only\*)  
6765 Southeastern Ave. #3  
Las Vegas Nevada 89119

- Lab Cor Inc. Portland  
4321 S. Corbett Ave.  
Portland OR 97239
- Seattle Asbestos Test  
4500 9th Ave NE.  
Ste. #300, Seattle, WA 98105
- SGS / Galson - Carson CA  
20535 Belshaw Ave  
Carson, CA 90746

- NVL Labs Inc.  
4708 Aurora Ave. North  
Seattle WA 98103
- EMC Labs Inc. (Asb/Pb/Mold)  
9830 S. 51st Street  
Phoenix AZ 85044
- Other: SGS/Hayward  
3777 Depot Rd  
Suite 409  
Hayward, CA 94545

ASBESTOS:

- PLM Bulk
- Asbestos Dust
- Other: \_\_\_\_\_

LEAD:

- Dust/wipe
- Pb TCLP
- Pb Paint Chip

MOLD (Fungi):

- Tape (Direct)
- Spore Trap (Air)
- Swab (Direct)
- Bulk (Spore Ct)

ANALYTICAL PROTOCOL:

- BFL 400x-1000x (MOLD)
- Flame AAS 7082 (Pb Paint)
- EPA 600/R-93/116 (Asbestos PLM)
- Cincinnati Method (Asbestos Vermiculite)

EMAIL RESULTS TO:

- Justin.Ware@pbsusa.com
- Carson.Linklater@pbsusa.com
- Kanani.Young@pbsusa.com
- DeAngelo.Nelson@pbsusa.com
- Kaitlyn.Gamble@pbsusa.com
- Cienna.Landon@pbsusa.com
- \_\_\_\_\_@pbsusa.com

TURN AROUND TIME:

- Rush
- 4-Hour
- 6-Hour
- 24-Hour
- 48-Hour
- 72-Hour
- Standard
- 5-day
- 7-day
- Other \_\_\_\_\_

OTHER ANALYTE:

\_\_\_\_\_ Method: \_\_\_\_\_

Codes / ARCHIVE	Sample ID	Lab ID No.	Dimensions / Quantities SF/LF	Building / Floor / Location / Description / Color / on Substrate
CERGR	0001			12x4 gray ceramic floor tile with gray grout/bedding - center
↓	0002			"
↓	0003			"
VFT/M	0004			white/pink - 12x12 vinyl floor tile - yellow mastic - center
↓	0005			"
↓	0006			"
COVBAS	0007			4" black w. wall Covebase with brown mastic
↓	0008			" - East wall
↓	0009			" - East wall
LCT	0010			2x4- Pinfissure ceiling tile - lay-in - center of building
↓	0011			"
↓	0012			"

SPECIAL INSTRUCTIONS

Notes: \_\_\_\_\_

Stop at first positive layer  
 Stop at first positive sample

Relinquished by: <u>Cienna</u>	Date: <u>9/11/23</u>	Received by: _____	Date: _____
Analyzed by: _____	Date: _____	Sample Condition Upon Receipt: <input type="checkbox"/> Acceptable <input type="checkbox"/> Other (explain): _____	
Method of Shipment: _____	Date: _____	_____	

**CODES:**  
 ARC: Archive --- API: Asbestos Pipe Insulation --- BLOCK: Mag Block TSI --- BOIL: Boiler Insulation --- BUR: Built-up Roofing --- BLOWN: Blown in insulation --- CAB: Cement asb board --- CMU: concrete masonry unit grout --- CAULK: caulking/sealant --- CARPMAS: Carpet mastic --- CERGR: Ceramic tile/grout --- CG/CT: Concealed grid Ceiling Tile --- GCT: Glued Ceiling Tile --- COVBAS: Covebase/Mastic --- DEBRIS: misc. debris --- DUST: misc. settled dust --- FAB: coarse fiber woven fabric --- FELT: Felt TSI heavier than paper --- FIREDR: Fire Door --- FRP: Fiberglass Reinforced Plastic Panels (mastics) --- GASKET: rope textile or vinyl material seal --- GLZ: window glazing compound --- GYPJC: Gypsum Joint Compound --- SPRAY: spray on ceiling textured popcorn --- T-TEX: troweled textured material --- TRANS: Transite AC Pipe --- GYPSR: Gypsum and Plaster --- TANK: tank insulation fluffy white magnesium hardriable --- HF: Hard Fittings on Pipe TSI --- TSI: Thermal System Insulation --- LABTOP: Laboratory counter top --- LCT: Lay in ceiling tile --- LVLCMP: Leveling comp. --- MASTIC: adhesive/mastic --- MISC: Miscellaneous Materials (describe in detail) --- SHINGL: Roof shingle --- SEAL: Sealant --- RPS: Roof penetration (vent sealant) --- SFPF: sprayed fibrous fire proofing --- SOIL: earth, gravel, soil --- TAR: Asphaltic black tar --- TARP: Asphaltic tar paper, vapor barrier --- PAPER: Paper felt/underlayment --- WOVEN: fibrous woven material --- WIRE: wire insulation

Project Name/Scope: Pre-Demolition Hazardous materials survey PBS Project No. 63275.001  
 Project Address: 590 Gage Blvd. Richland, WA Proj. Date: 9/11/23 Temp: 70°  
 Client Name/POC: Kiemle Hagedorn Proj. Manager: Justin Ware Sampled By: Justin Ware

**Send Samples to:**

Lab Cor Inc. Seattle  
7619 6th Ave. NW  
Seattle WA 98117

RJ Lee Group (TCLP-RCRAB)  
350 Hochberg Rd.  
Monroeville PA 15146

SGS / Galson - Vegas (PLM only\*)  
6765 Southeastern Ave. #3  
Las Vegas Nevada 89119

Lab Cor Inc. Portland  
4321 S. Corbett Ave.  
Portland OR 97239

Seattle Asbestos Test  
4500 9th Ave NE.  
Ste. #300, Seattle, WA 98105

SGS / Galson - Carson CA  
20535 Belshaw Ave  
Carson, CA 90746

NVL Labs Inc.  
4708 Aurora Ave. North  
Seattle WA 98103

EMC Labs Inc. (Asb/Pb/Mold)  
9830 S. 51st Street  
Phoenix AZ 85044

Other: SGS/Hayward  
3777 Depot Rd  
Suite 2109  
Hayward, CA 94545

**ASBESTOS:**

- PLM Bulk  
 Asbestos Dust  
 Other: \_\_\_\_\_

**LEAD:**

- Dust/wipe  
 Pb TCLP  
 Pb Paint Chip

**MOLD (Fungi):**

- Tape (Direct)       Swab (Direct)  
 Spore Trap (Air)       Bulk (Spore Ct)

**ANALYTICAL PROTOCOL:**

- BFL 400x-1000x (MOLD)  
 Flame AAS 7082 (Pb Paint)  
 EPA 600/R-93/116 (Asbestos PLM)  
 Cincinnati Method (Asbestos Vermiculite)

**EMAIL RESULTS TO:**

- Justin.Ware@pbsusa.com  
 Carson.Linklater@pbsusa.com  
 Kanani.Young@pbsusa.com  
 DeAngelo.Nelson@pbsusa.com  
 Kaitlyn.Gamble@pbsusa.com  
 Cienna.Landon@pbsusa.com  
 \_\_\_\_\_@pbsusa.com

**TURN AROUND TIME:**

- Rush       4-Hour       6-Hour  
 24-Hour       48-Hour       72-Hour  
 Standard       5-day       7-day  
 Other \_\_\_\_\_

**OTHER ANALYTE:**

\_\_\_\_\_ Method: \_\_\_\_\_

Codes / ARCHIVE	Sample ID	Lab ID No.	Dimensions / Quantities SF/LF	Building / Floor / Location / Description / Color / on Substrate
GYP/SC	0013			Gypsum Ceiling system with joint compound C.L. Board Orange peel texture - North end building
	0014			" " - restroom "
	0015			" " - restroom "
	0016			Gypsum wall system with joint compound - unfinished West corner of building
	0017			" " "
	0018			" " "
	0019			Gypsum wall board system with joint compound Orange peel texture - N. wall
	0020			Gypsum wall board system with joint compound - Orange peel texture - N. wall
	0021			" S. wall "
	0022			" wall outside office "
	0023			" wall outside restroom "
	0024			" wall outside Janitorial closet "

**SPECIAL INSTRUCTIONS**

Notes: \_\_\_\_\_  Stop at first positive layer  
 Stop at first positive sample

Relinquished by: <u>[Signature]</u>	Date: <u>9/11/23</u>	Received by:	Date:
Analyzed by:	Date:	Sample Condition Upon Receipt: <input type="checkbox"/> Acceptable <input type="checkbox"/> Other (explain):	
Method of Shipment:	Date:		

**CODES:**  
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 FAB: coarse fiber woven fabric -- FELT: Felt TSI heavier than paper -- FIREDR: Fire Door -- FRP: Fiberglass Reinforced Plastic Panels (mastics) -- GASKET: rope textile or vinyl material seal -- GLZ: window glazing compound --  
 GYPJC: Gypsum Joint Compound -- SPRAY: spray on ceiling textured popcorn -- T-TEX: troweled textured material -- TRANS: Transite AC Pipe GYPSTR: Gypsum and Plaster -- TANK: tank insulation fluffy white magnesium hydroxide  
 HF: Hard Fittings on Pipe TSI -- TSI: Thermal System Insulation -- LABTOP: Laboratory counter top -- LCT: Lay in ceiling tile -- LVLCMP: Leveling comp. -- MASTIC: adhesive/mastic -- MISC: Miscellaneous Materials (describe in detail)  
 MIC: Mechanical Isolation Cloth woven fabric prevents vibration -- PAINT: older thick flaking primers contained asbestos -- PLSTER: troweled on plaster -- RFFELT: Roofing Felt -- SHT: sheet vinyl flooring -- VAT/VFT: vinyl floor tile --  
 SHINGL: Roof shingle -- SEAL: Sealant -- RPS: Roof penetration (vent sealant) -- SFPF: sprayed fibrous fire proofing -- SOIL: earth, gravel, soil -- TAR: Asphaltic black tar -- TARP: Asphaltic tar paper, vapor barrier --  
 PAPER: Paper felt/underlayment -- WOVEN: fibrous woven material -- WIRE: wire insulation

Project Name/Scope: Pre-Demolition Hazardous Materials survey PBS Project No. 63275.001  
 Project Address: 590 Gage Blvd., Richland, WA Proj. Date: 9/11/23 Temp: 70°  
 Client Name/POC: Kiemle Haggood Proj. Manager: Justin Ware Sampled By: Justin Ware

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Seattle WA 98103
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Carson, CA 90746
- Other: SGS/Hayward  
3777 Depot Rd  
Suite 409  
Hayward, CA 94545

- ASBESTOS:**
- PLM Bulk
  - Asbestos Dust
  - Other: \_\_\_\_\_
- LEAD:**
- Dust/wipe
  - Pb TCLP
  - Pb Paint Chip

- MOLD (Fungi):**
- Tape (Direct)
  - Spore Trap (Air)
  - Swab (Direct)
  - Bulk (Spore Ct)

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  - DeAngelo.Nelson@pbsusa.com
  - Kaitlyn.Gamble@pbsusa.com
  - Cienna.Landon@pbsusa.com
  - \_\_\_\_\_@pbsusa.com

- TURN AROUND TIME:**
- Rush
  - 4-Hour
  - 6-Hour
  - 24-Hour
  - 48-Hour
  - 72-Hour
  - Standard
  - 5-day
  - 7-day
  - Other \_\_\_\_\_

**OTHER ANALYTE:**

\_\_\_\_\_ Method: \_\_\_\_\_

Codes / ARCHIVE	Sample ID	Lab ID No.	Dimensions / Quantities SF/LF	Building / Floor / Location / Description / Color / on Substrate
GYP/IC	0025			Gypsum wallboard wall system - <u>C.L.</u> <u>orange peel texture</u>
CAULK	0026			Gray sealant - on concrete floor
	0027			" "
	0028			" "
	0029			White sealant - sink backsplash
	0030			
	0031			
MISC	0032			FRP mastic - yellow - restroom wall
	0033			" "
	0034			" "
CMU	0035			CMU block - fill and mortar - N. exterior wall
MISC	0036			sidewalk - white leveling compound - E. exterior

**SPECIAL INSTRUCTIONS**

Notes: \_\_\_\_\_

- Stop at first positive layer
- Stop at first positive sample

Relinquished by: <u>[Signature]</u>	Date: <u>9/11/23</u>	Received by: _____	Date: _____
Analyzed by: _____	Date: _____	Sample Condition Upon Receipt: <input type="checkbox"/> Acceptable <input type="checkbox"/> Other (explain): _____	
Method of Shipment: _____	Date: _____	_____	

**CODES:**  
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 PAPER: Paper felt/underlayment --- WOVEN: fibrous woven material --- WIRE: wire insulation



Project Name/Scope: Pre-Demolition Hazardous Materials survey PBS Project No. 63275.001  
 Project Address: 590 Gage Blvd., Richmond, VA Proj. Date: 9/11/23 Temp: 70°  
 Client Name/POC: Kiemle Haggood Proj. Manager: Justin Ware Sampled By: Justin Ware

Send Samples to:

- Lab Cor Inc. Seattle  
7619 6th Ave. NW  
Seattle WA 98117
- RJ Lee Group (TCLP-RCRAB)  
350 Hochberg Rd.  
Monroeville PA 15146
- SGS / Galson - Vegas (PLM only\*)  
6765 Southeastern Ave. #3  
Las Vegas Nevada 89119
- Lab Cor Inc. Portland  
4321 S. Corbett Ave.  
Portland OR 97239
- Seattle Asbestos Test  
4500 9th Ave NE.  
Ste. #300, Seattle, WA 98105
- SGS / Galson - Carson CA  
20535 Belshaw Ave  
Carson, CA 90746
- NVL Labs Inc.  
4708 Aurora Ave. North  
Seattle WA 98103
- EMC Labs Inc. (Asb/Pb/Mold)  
9830 S. 51st Street  
Phoenix AZ 85044
- Other: SGS/Hayward  
3777 DEPUT RD  
SUITE 409  
Hayward, CA 94545

- ASBESTOS:**  
 PLM Bulk  
 Asbestos Dust  
 Other: \_\_\_\_\_
- LEAD:**  
 Dust/wipe  
 Pb TCLP  
 Pb Paint Chip

- MOLD (Fungi):**  
 Tape (Direct)  
 Spore Trap (Air)  
 Swab (Direct)  
 Bulk (Spore Ct)

- ANALYTICAL PROTOCOL:**  
 BFL 400x-1000x (MOLD)  
 Flame AAS 7082 (Pb Paint)  
 EPA 600/R-93/116 (Asbestos PLM)  
 Cincinnati Method (Asbestos Vermiculite)

EMAIL RESULTS TO:

- Justin.Ware@pbsusa.com
- Carson.Linklater@pbsusa.com
- Kanani.Young@pbsusa.com
- DeAngelo.Nelson@pbsusa.com
- Kaitlyn.Gamble@pbsusa.com
- Cienna.Landon@pbsusa.com
- \_\_\_\_\_@pbsusa.com

TURN AROUND TIME:

- Rush  4-Hour  6-Hour
- 24-Hour  48-Hour  72-Hour
- Standard  5-day  7-day
- Other \_\_\_\_\_

OTHER ANALYTE:

\_\_\_\_\_ Method: \_\_\_\_\_

Codes / ARCHIVE	Sample ID	Lab ID No.	Dimensions / Quantities SF/LF	Building / Floor / Location / Description / Color / on Substrate
MISC	0037			Black - roof flashing - Silver paper
ISEAL	0038			Black - perimeter sealant - roof - center
SEAL	0039			Black - flashing sealant - roof - center
TAR	0040			Black tar roofing - roof

SPECIAL INSTRUCTIONS

Notes: \_\_\_\_\_

Stop at first positive layer  
 Stop at first positive sample

Relinquished by: <u>[Signature]</u>	Date: <u>9/11/23</u>	Received by: _____	Date: _____
Analyzed by: _____	Date: _____	Sample Condition Upon Receipt: <input type="checkbox"/> Acceptable <input type="checkbox"/> Other (explain): _____	_____
Method of Shipment: _____	Date: _____	_____	_____

**CODES:**  
 ARC: Archive -- API: Asbestos Pipe Insulation -- BLOCK: Mag Block TSI -- BOIL: Boiler Insulation -- BUR: Built-up Roofing -- BLOWN: Blown in insulation -- CAB: Cement ash board -- CMU: concrete masonry unit grout --  
 CAULK: caulking/sealant -- CARPMAS: Carpet mastic -- CERGR: Ceramic tile/grout -- CG/CT: Concealed grid Ceiling Tile -- GCT: Glued Ceiling Tile -- COVBAS: Covebase/Mastic -- DEBRIS: misc. debris -- DUST: misc. settled dust --  
 FAB: coarse fiber woven fabric -- FELT: Felt TSI heavier than paper -- FIREDR: Fire Door -- FRP: Fiberglass Reinforced Plastic Panels (mastics) -- GASKET: rope textile or vinyl material seal -- GLZ: window glazing compound --  
 GYPJC: Gypsum Joint Compound -- SPRAY: spray on ceiling textured popcorn -- T-TEX: troweled textured material -- TRANS: Transite AC Pipe GYPSTR: Gypsum and Plaster -- TANK: tank insulation fluffy white magnesium hydroxide  
 HF: Hard Fittings on Pipe TSI -- TSI: Thermal System Insulation -- LABTOP: Laboratory counter top -- LCT: Lay in ceiling tile -- LVLCMP: Leveling comp. -- MASTIC: adhesive/mastic -- MISC: Miscellaneous Materials (describe in detail)  
 MIC: Mechanical Isolation Cloth woven fabric prevents vibration -- PAINT: older thick flaking primers contained asbestos -- PLSTER: troweled on plaster -- RFFELT: Roofing Felt -- SHT: sheet vinyl flooring -- VAT/VFT: vinyl floor tile --  
 SHINGL: Roof shingle -- SEAL: Sealant -- RPS: Roof penetration (vent sealant) -- SFFP: sprayed fibrous fire proofing -- SOIL: earth, gravel, soil -- TAR: Asphaltic black tar -- TARP: Asphaltic tar paper, vapor barrier --  
 PAPER: Paper felt/underlayment -- WOVEN: fibrous woven material -- WIRE: wire insulation

## **APPENDIX B**

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### **AA Lead Paint Chip Sampling Information**

AA Lead Paint Chip Sample Inventory

AA Lead Paint Chip Laboratory Data Sheets

AA Lead Paint Chip Chain of Custody Documentation



400 BRADLEY BOULEVARD, SUITE 106, RICHLAND, WA 99352  
509.942.1600 MAIN ■ 866.727.0140 FAX ■ WWW.PBSUSA.COM

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Sample No.	Paint Color / Component or Substrate	Sample Location	Result (ppm)	Lab
1001	Black and Gray Layered Paint on Cement	East Exterior Sidewalk	<0.006	SGS
1002	Brown Paint on Wood	South Exterior Siding	<0.006	SGS
1003	White Paint on Wood	South Exterior Siding	<0.006	SGS
1004	Red Paint on Wood	South Exterior Siding	<0.006	SGS
1005	Yellow Paint on Gypsum Wall	Interior North Wall	<0.007	SGS
1006	Blue Paint on Gypsum Wall	Interior East Wall	<0.007	SGS
1007	Light Brown Paint on Gypsum Wall	Interior North Wall	<0.007	SGS

---

# Metals Analysis of Paints

(AIHA-LAP, LLC Accreditation, Lab ID #101762)

PBS Engineering & Environmental Inc.  
Kanani Young  
400 Bradley Blvd.  
Suite 106  
Richland, WA 99352

**Client ID:** L2129  
**Report Number:** M253919  
**Date Received:** 09/12/23  
**Date Analyzed:** 09/12/23  
**Date Printed:** 09/12/23  
**First Reported:** 09/12/23

**Job ID / Site:** 63275.001 - Pre-Demolition Hazardous Materials Survey 590 Gage Blvd  
Richland WA

**SGSFL Job ID:** L2129

**Date(s) Collected:**

**Total Samples Submitted:** 7

**Total Samples Analyzed:** 7

Sample Number	Lab Number	Analyte	Result	Result Units	Reporting Limit*	Method Reference
1001	30927384	Pb	< 0.006	wt%	0.006	EPA 3050B/7000B
1002	30927385	Pb	< 0.006	wt%	0.006	EPA 3050B/7000B
1003	30927386	Pb	< 0.006	wt%	0.006	EPA 3050B/7000B
1004	30927387	Pb	< 0.006	wt%	0.006	EPA 3050B/7000B
1005	30927388	Pb	< 0.007	wt%	0.007	EPA 3050B/7000B
1006	30927389	Pb	< 0.007	wt%	0.007	EPA 3050B/7000B
1007	30927390	Pb	< 0.006	wt%	0.006	EPA 3050B/7000B

\* The Reporting Limit represents the lowest amount of analyte that the laboratory can confidently detect in the sample, and is not a regulatory level. The Units for the Reporting Limit are the same as the Units for the Final Results.



Kevin Poon, Laboratory Supervisor, Hayward Laboratory

Analytical results and reports are generated by SGS Forensic Laboratories at the request of and for the exclusive use of the person or entity (client) named on such report. Results, reports or copies of same will not be released by SGS Forensic Laboratories to any third party without prior written request from client. This report applies only to the sample(s) tested. Supporting laboratory documentation is available upon request. This report must not be reproduced except in full, unless approved by SGS Forensic Laboratories. The client is solely responsible for the use and interpretation of test results and reports requested from SGS Forensic Laboratories. SGS Forensic Laboratories is not able to assess the degree of hazard resulting from materials analyzed. SGS Forensic Laboratories reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified. Any modifications that have been made to referenced test methods are documented in SGS Forensic Laboratories' Standard Operating Procedures Manual. Sample results have not been blank corrected. Quality control and sample receipt condition were acceptable unless otherwise noted.

Note\* Sampling data used in this report was provided by the client as noted on the associated chain of custody form.



Project Name/Scope: Pre-Demolition Hazardous Materials Survey PBS Project No. 63275.001  
Project Address: 590 Gage Blvd, Richland, WA Proj. Date: 9/11/23 Temp: 70°  
Client Name/POC: Kiemle Hagedorn Proj. Manager: Justin Ware Sampled By: Justin Ware

Send Samples to:

- Lab Cor Inc. Seattle  
7619 6th Ave. NW  
Seattle WA 98117
- RI Lee Group (TCLP-RCRAB)  
350 Hochberg Rd.  
Monroeville PA 15146
- SGS / Galson - Vegas (PLM only\*)  
6765 Southeastern Ave. #3  
Las Vegas Nevada 89119

- Lab Cor Inc. Portland  
4321 S. Corbett Ave.  
Portland OR 97239
- Seattle Asbestos Test  
4500 9th Ave NE.  
Ste. #300, Seattle, WA 98105
- SGS / Galson - Carson CA  
20535 Belshaw Ave  
Carson, CA 90746

- NVL Labs Inc.  
4708 Aurora Ave. North  
Seattle WA 98103
- EMC Labs Inc. (Asb/Pb/Mold)  
9830 S. 51st Street  
Phoenix AZ 85044

Other: SGS/HAYWARD  
3777 Depot RD  
Suite 409  
Hayward, CA 94545

- ASBESTOS:**
- PLM Bulk
  - Asbestos Dust
  - Other: \_\_\_\_\_
- LEAD:**
- Dust/wipe
  - Pb TCLP
  - Pb Paint Chip

- MOLD (Fungl):**
- Tape (Direct)
  - Spore Trap (Air)
  - Swab (Direct)
  - Bulk (Spore Ct)

- ANALYTICAL PROTOCOL:**
- BFL 400x-1000x (MOLD)
  - Flame AAS 7082 (Pb Paint)
  - EPA 600/R-93/116 (Asbestos PLM)
  - Cincinnati Method (Asbestos Vermiculite)

EMAIL RESULTS TO:

- Justin.Ware@pbsusa.com
- Carson.Linklater@pbsusa.com
- Kanani.Young@pbsusa.com
- DeAngelo.Nelson@pbsusa.com
- Kaitlyn.Gamble@pbsusa.com
- Cienna.Landon@pbsusa.com
- \_\_\_\_\_@pbsusa.com

TURN AROUND TIME:

- Rush
- 4-Hour
- 6-Hour
- 24-Hour
- 48-Hour
- 72-Hour
- Standard
- 5-day
- 7-day
- Other \_\_\_\_\_

OTHER ANALYTE:

\_\_\_\_\_ Method: \_\_\_\_\_

Codes / ARCHIVE	Sample ID	Lab ID No.	Dimensions / Quantities SFLF	Building / Floor / Location / Description / Color / on Substrate
	1001			Black and gray layered paint on cement sidewalk - exterior - east
	1002			Brown paint on wood - siding exterior - south
	1003			white paint on wood siding - exterior - south
	1004			red paint on wood siding - exterior - south
	1005			yellow paint on textured gypsum wallboard - interior N. wall
	1006			blue paint on textured gypsum wallboard - interior E. wall
	1007			light brown paint on textured gypsum wallboard interior N. wall

SPECIAL INSTRUCTIONS

Notes: \_\_\_\_\_  Stop at first positive layer  Stop at first positive sample

Relinquished by: <u>Cienna Landon</u>	Date: <u>9/11/23</u>	Received by: _____	Date: _____
Analyzed by: _____	Date: _____	Sample Condition Upon Receipt: <input type="checkbox"/> Acceptable <input type="checkbox"/> Other (explain): _____	
Method of Shipment: _____	Date: _____		

**RECEIVED**  
SEP 11 2023  
R 4:46  
1130

**CODES:**  
 ARC: Archive -- API: Asbestos Pipe Insulation -- BLOCK: Mag Block TSI -- BOIL: Boiler Insulation -- BUR: Built-up Roofing -- BLOWN: Blown in insulation -- CAB: Cement substrate -- CMU: concrete masonry unit grout -- CAULK: caulking/sealant -- CARPET: Carpet mastic -- CERGRIT: Ceramic fibergrout -- CGCT: Concealed grid Ceiling Tile -- GCT: Glued Ceiling Tile -- CONV: Convective ceiling -- CRACK: Crack sealant -- DUST: misc. settled dust -- FAB: coarse fiber woven fabric -- FELT: felt TSI heavier than paper -- FIREDR: Fire Door -- FRP: Fiberglass Reinforced Plastic Panels (mastics) -- GASKE: Gas-tight sealant -- GLZ: window glazing compound -- GYPJC: Gypsum Joint Compound -- SPRAY: spray on ceiling textured popcorn -- T-TEX: troweled textured material -- TRANS: Transite AC Pipe GYPSTR: Gypsum and Plaster -- TANK: tank insulation fluffy white magnesium hydroxide -- HF: Hard Fittings on Pipe TSI -- TSI: Thermal System Insulation -- LABTOP: Laboratory counter top -- LCT: Lay in ceiling tile -- LVLCOMP: Leveling comp. -- MASTIC: adhesive/mastic -- MISC: Miscellaneous materials (describe in detail) -- MIC: Mechanical Isolation Cloth woven fabric prevents vibration -- PAINT: slider thick flaking primers contained asbestos -- PLSTER: troweled on plaster -- RFFELT: Roofing Felt -- SHT: sheet vinyl flooring -- VAT/VPF: vinyl floor tile -- SHINGL: Roof shingle -- SEAL: Sealant -- RPS: Roof penetration (vent) sealant -- SFPF: sprayed fibrous fire proofing -- SOL: earth, gravel, soil -- TAR: Asphaltic black tar -- TARP: Asphaltic tar paper, vapor barrier -- PAPER: Paper felt/underlayment -- WOVEN: fibrous woven material -- WIRE: wire insulation

## **APPENDIX C**

---

### **Certifications**

THIS IS TO CERTIFY THAT

**JUSTIN WARE**

**HAS SUCCESSFULLY COMPLETED THE TRAINING COURSE**

**for**

**ASBESTOS INSPECTOR / MANAGEMENT  
PLANNER REFRESHER**

In accordance with TSCA Title II, Part 763, Subpart E, Appendix C of 40 CFR

Course Date: 02/13/2023

Course Location: Online

Certificate: IMR-23-5145B



**CCB #SRA0615 4-Hr Training**

AHERA is the Asbestos Hazard Emergency Response Act enacting Title II of Toxic Substance Control Act (TSCA)

**Expiration Date:** 02/13/2024

For verification of the authenticity of this certificate contact:  
PBS Engineering and Environmental Inc.  
4412 S Corbett Avenue  
Portland, OR 97239  
503.248.1939

A handwritten signature in black ink that reads "Andy Fridley".

Andy Fridley, Instructor

THIS IS TO CERTIFY THAT

**CIENNA LANDON**

**HAS SUCCESSFULLY COMPLETED THE TRAINING COURSE**

**for**

**ASBESTOS INSPECTOR / MANAGEMENT  
PLANNER REFRESHER**

In accordance with TSCA Title II, Part 763, Subpart E, Appendix C of 40 CFR

Course Date: 06/20/2023

Course Location: Online Training,

Certificate: IMR-23-0507C



**CCB #SRA0615 4-Hr Training**

AHERA is the Asbestos Hazard Emergency Response Act enacting Title II of Toxic Substance Control Act (TSCA)

**Expiration Date:** 06/20/2024

For verification of the authenticity of this certificate contact:  
PBS Engineering and Environmental Inc.  
4412 S Corbett Avenue  
Portland, OR 97239  
503.248.1939

A handwritten signature in black ink that reads "Andy Fridley".

Andy Fridley, Instructor



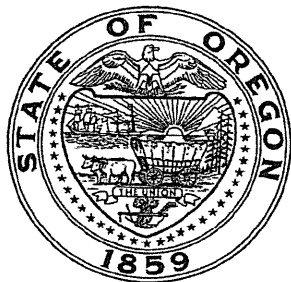
State of Oregon  
Oregon Health Authority

**Justin F. Ware**

is certified by the Oregon Health Authority to conduct Lead-Based Paint Activities

**Risk Assessor**

Certification Number:	2811--Indv--R
Issuance Date:	4/11/2023
Expiration Date:	4/11/2026



Oregon  
**Health**  
Authority

State of Oregon  
Oregon Health Authority

**Cienna M. Landon**

is certified by the Oregon Health Authority to conduct Lead-Based Paint Activities

**Inspector**

Certification Number:	2809--Indv--I
Issuance Date:	4/4/2023
Expiration Date:	4/4/2026



Oregon  
**Health**  
Authority