

**EXHIBIT B**  
**Scope of Work**  
**Ultra Custom Care Cleaners Site**

The Potentially Liable Person (PLP) shall take the following remedial actions per the Schedule of Deliverables, detailed in Exhibit C of this Agreed Order (Order) for conducting a remedial investigation and feasibility study (RI/FS), interim remedial action, and preparing a draft cleanup action plan (DCAP). The PLP will work cooperatively with Ecology to support public participation in the scoping and implementation of the work to be performed under this Agreed Order in accordance with Section VIII.H of the Order. All deliverables will adhere to Ecology Executive Policy 1-81 (Establishing Plain Talk at Ecology).

This Scope of Work is to investigate contamination at the Ultra Custom Care Cleaners Site located at and around 18304 Bothell Way NE in downtown Bothell, Washington. This Scope of Work is to be used by the PLP to develop Work Plans in order to complete the RI/FS and interim action at the Site as required by the Model Toxics Control Act (MTCA) cleanup regulation (Chapter 173-340 WAC).

The tasks for the Site will include the following:

- TASK I. Draft Remedial Investigation Report and Remedial Investigation Data Gaps Work Plan
- TASK II. Interim Action Work Plan
- TASK III. Implement Interim Action
- TASK IV. Draft Final Remedial Investigation Report
- TASK V. Feasibility Study and Draft Feasibility Study Report
- TASK VI. Draft Cleanup Action Plan

**Task I: Draft Remedial Investigation Report and Remedial Investigation Data Gaps Work Plan**

The City has previously conducted independent remedial actions in the form of remedial investigations. Remedial investigations must meet the requirements listed below. Pursuant to WAC 173-340-350, the PLP shall develop a remedial investigation report based on the existing

data to address any potential data gaps. The data collected shall be developed into an remedial investigation data gaps work plan, which shall also meet the requirements of WAC 173-340-350.

The purpose of the Remedial Investigation (RI) is to obtain the information necessary to understand site conditions in relationship to known or suspected releases of contaminants. Specifically, new and existing information will be used to characterize the Site, identify known and potential contaminant sources, and establish the nature and extent of contamination present to sufficiently complete a feasibility study and select an appropriate remedial action. The RI data must meet the criteria set out in the Quality Assurance Project Plan and be of sufficient quality to support the development of an appropriate remedial action for the Site. The investigation will meet the requirements stated in WAC 173-340-350 and, more specifically, must include the following elements:

**a. Site Characterization**

Collect analytical data on groundwater and soils contamination in the vicinity of the Site. Considering information on historical operations and hydrogeology, the data must be sufficient to delineate the type, depth, concentration, and areal extent of contaminants, along with information that addresses the rate and direction of contaminant movement.

1. Collect background information from previous environmental investigations, other Ecology information, and any other historical data.
2. Hydrogeology  
An investigation of the regional and Site-specific geologic and hydrogeologic characteristics affecting groundwater flow through the Site:
  - a. Evaluate and monitor all existing monitoring wells that comply with the requirements of Chapter 173-160 WAC.
  - b. Install new groundwater monitoring wells and soil borings where needed.
  - c. Characterize site-specific stratigraphy and lithology based on well logs, maps, and any other information available, including identification of major aquifer and aquitard units.

- d. Estimate or measure hydraulic conductivity and porosity based on well logs, samples, aquifer tests, and other general information available.
- e. Prepare maps showing water levels and regional/site hydrogeology, and inferred direction of groundwater flow.

3. Soils

- a. Drill soil borings and/or excavate test pits, where needed. Collect and analyze surface and subsurface soil samples, as appropriate, to support characterization of vadose zone conditions and support contaminant fate and transport analyses.
- b. Characterize soil samples using the Unified Soil Classification System (USCS).
- c. Prepare boring logs for each boring.

**b. Source and Contamination Characterization**

- 1. Identify known or potential sources of contamination based on past facility practices, and reported spills or releases. Evaluate possible facility areas where hazardous substance use, storage, or release may have occurred using appropriate intrusive or non-intrusive methods of investigation.
- 2. Sampling locations will be selected to characterize the contamination including the nature and extent, along with fate and transport.
- 3. Analytical data collected must help describe the nature, extent, and the existing and potential sources of contamination.
- 4. Investigation of surface and subsurface contamination at the site will include surface water bodies.

**c. Potential Receptor Information**

Collect data to permit the evaluation of appropriate human and ecological cleanup standards (WAC 173-340-700 through -760). This may include:

1. Public Use/Site Access – potential uses of the affected properties, including zoning and land use. The presence or absence of controls on site access.
2. Potential Groundwater/Surface Water Uses – any consumptive, recreational, or other use of groundwater and surface water in the area, and used by which populations.
3. Potential Air and Soil-Gas Pathways – any basements or other spaces that are below grade.
4. Environmental Receptors – information on ecological environments at the site, including the presence of endangered or threatened species.

**Task II. Interim Action Work Plans**

The PLP will submit a draft and final Interim Action Work Plan for Ecology’s review and approval. The draft Interim Action Work Plan will also include the design and implementation of interim actions to facilitate protection of human health and the environment. The scope of the interim action may include source control via excavation and off-site disposal, and/or in situ remediation via chemical oxidation or other methods, followed by confirmational sampling, backfill with clean material, supplemental site characterization, pumping/treating contaminated groundwater, and groundwater monitoring in major areas of contamination at the site as identified in preliminary remedial investigative work. The Interim Action Work Plans shall include, as appropriate, submittal requirements in accordance with WAC 173-340-430(7).

The interim action shall be designed in a manner that will not foreclose reasonable alternatives for the final cleanup action in accordance with WAC 173-340-430(3)(b).

**Task III. Implement Approved Interim Action**

1. Implement approved interim action(s) after Ecology review and approval and public review and comment as necessary under WAC 173-340-600(16) and the State Environmental Policy Act, Chapter 43.21C RCW and Chapter 197-11 WAC.

2. Interim Action Report: An Interim Action Report shall be prepared as a separate deliverable that includes the information listed in WAC 173-340-430(7). A draft and final Interim Action Report shall be submitted for Ecology review and approval.

**Task IV. Draft Final Remedial Investigation Report**

The PLP will complete a report documenting the Remedial Investigation as required by WAC 173-340-350(7). This report will include the following elements:

1. Background Information:
  - a. Site History.
  - b. Previous Studies.
2. Nature and Extent of Contamination:

The PLP will prepare an assessment and description of the degree and extent of contamination. This should include:

  - a. Data Analysis – analyze all data collected during previous tasks and prepare supporting maps and tables.
  - b. Lab reports, previous investigations, well and boring logs, and any other documentation of characterization activities.
  - c. Presentation of conceptual site models.
3. Applicable Relevant and Appropriate Requirements (ARARs) Analysis  
Identify Applicable State and Federal Laws for cleanup of the Site in accordance with WAC 173-340-710.
4. Cleanup Levels/Risk Assessment Analysis:

Perform a baseline MTCA cleanup levels analysis/baseline risk assessment characterizing the current and potential threats to public health and the environment that may be posed by hazardous substances at the facility. The assessment will integrate cleanup standards and risk assessment as required by WAC 173-340-357 and -708.

5. Discussion and Recommendations:
  - a. Interpret and discuss data to determine the nature and extent of the contamination and to support final recommendations for the Site.
  - b. A summary of all possible and suspected source areas of contamination based on the data collected will be included.
  - c. Any known or potential risks to the public health, welfare, and the environment should be discussed.
  - d. Recommendations should be provided identifying additional data requirements.

**Task V. Feasibility Study and Draft Feasibility Study Report**

**a. Feasibility Study**

The purpose of the feasibility study is to evaluate potential remedial technologies and approaches to enable selection of an appropriate remedial action for the Site. The selected remedy will be established by Ecology with the Draft Cleanup Action Plan (DCAP), to be developed following completion and approval of the final RI/FS Report. Ecology will provide an evaluation of preliminary cleanup standards for the Site, as appropriate, to guide cleanup alternatives development. The feasibility study must meet the requirements stated in WAC 173-340-350(8).

**b. Progress Reports**

The PLP shall submit progress reports every three months or as appropriately scheduled with Ecology. Progress reports shall be submitted to Ecology until satisfaction of the Agreed Order in accordance with Section IX of the Order. At a minimum, progress reports shall contain the following information regarding the preceding reporting period:

1. A description of the actions which have been taken to comply with the Order.
2. Summaries of sampling and testing reports and other data reports received by the PLP.
3. Summaries of deviations from approved work plans.

4. Summaries of contacts with representatives of the local community, public interest groups, press, and federal, state, or tribal governments.
5. Summaries of deviations, problems, or anticipated problems in meeting the schedule or objectives set forth in the Statement of Work and Work Plans.
6. Summaries of solutions developed and implemented or planned to address any actual or anticipated problems or delays.
7. Changes in key personnel.
8. A description of work planned for the next reporting period.

**c. Feasibility Study Report**

The PLP will complete a report documenting the feasibility study (FS) as required by WAC 173-340-350(8). This report will include the following elements:

1. Identification of contamination to be remediated.
2. Identification and initial screening of treatment technologies.
3. Proposed remedial alternatives and evaluation with respect to MTCA criteria.
4. Recommended alternative.

The PLP shall prepare an adequate number of copies of the draft FS report and submit them, including electronic copies in both Word (.doc) and Adobe (.pdf) format, to Ecology for review and comment. After addressing Ecology's comments on the draft FS report and after Ecology approval, the PLP shall prepare an adequate number of copies of the final FS report and submit them, including electronic copies in both Word (.doc) and Adobe (.pdf) format, to Ecology for distribution and public comment.

**Task VI. Draft Cleanup Action Plan**

The PLP will submit a draft Cleanup Action Plan (DCAP) for Ecology's review and approval. The DCAP will include, but not be limited to, the information listed under WAC 173-340-380. After receiving Ecology's comments on the DCAP, if any, the PLP shall revise the plan to address Ecology's comments and submit the final Cleanup Action Plan.