

December 23, 2021

Washington State Department of Ecology
Northwest Regional Office
3190 160th Avenue SE
Bellevue, WA 98008-5452

Attn: Dale Myers

Transmitted via email to: damy461@ecy.wa.gov

**Re: 2021 Annual Cap Monitoring Inspection
Northshore Pool Building – Anderson School Property
Bothell, Washington
Lot 2, Bothell BLA 2010-00006, AFN 20101230900001
Tax Parcel 062605-9370-02**

Dear Mr. Myers:

In accordance with the Environmental Covenant for the above-referenced property (subject property) dated June 18, 2012, and on behalf of Anderson School Properties, LLC, Landau Associates, Inc. (LAI) is submitting this letter report to document the 2021 cap monitoring inspection conducted for the Northshore Pool Building (pool building) in Bothell, Washington. The cap inspection was conducted on November 04, 2021. The subject property's Environmental Covenant requires groundwater monitoring in addition to cap monitoring, which is currently being conducted by the Washington State Department of Ecology (Ecology) as part of a bioremediation injection program that began in 2020. The bioremediation injection program aims to reduce and/or eliminate the reoccurring presence of dissolved-phase petroleum hydrocarbons in the vicinity of injection wells IW-1, IW-2 and IW-3 located on the north side of the pool building (Leidos 2020).

Background

The subject property is part of the Anderson School Property that Anderson School Properties, LLC purchased from the City of Bothell (City) in 2012. Contamination underlying the pool building originated from the adjacent BP Bothell gasoline station (Cleanup Site ID No. 5084). Ecology conducted a remedial action to address soil and groundwater contamination at the BP Bothell gasoline station property (Hart Crowser 2012) that included excavation and offsite disposal of impacted soil and bioremediation treatment of groundwater by way of two injection events (July and October 2011).

Ecology collected confirmation samples following its soil excavation work and also conducted four rounds of groundwater monitoring in 2011. Based on the available analytical data generated during the monitoring by Ecology, gasoline-range total petroleum hydrocarbons (TPH-G) and/or benzene,

toluene, ethylbenzene, and xylenes (BTEX) were still present after the remedial action in soil and groundwater at concentrations greater than the applicable Model Toxics Control Act (MTCA) Method A cleanup levels along the north side of the pool building.

Environmental Covenant

Based on the available correspondence, Ecology acknowledged the presence of residual petroleum hydrocarbon contamination under and/or immediately adjacent to the pool building and the BP Bothell gasoline station property, completed a supplemental feasibility study and a disproportionate cost analysis, and determined that “additional remedial activities would be disproportionate to the levels of remaining contamination at the site” (Ecology 2012). The owner of the BP Bothell gasoline station and the City signed and recorded an Environmental Covenant that requires the implementation of institutional controls and a monitoring plan for the portions of the BP Bothell gasoline station property (and the pool building) where contamination remains (City of Bothell 2012). As the current owner of the subject property, Anderson School Properties, LLC has conducted:

- A focused groundwater remedial action to address the remaining contamination at the subject property along the north side of and beneath the pool building
- Groundwater monitoring in accordance with the requirements of Exhibit B-1 of the Environmental Covenant
- Cap monitoring in accordance with the requirements of Exhibit B-2 of the Environmental Covenant.

Annual Cap Monitoring

The pool building foundation, concrete slab-on-grade, and swimming pool are monitored on an annual basis in accordance with the cap monitoring requirements in Exhibit B-2 of the Environmental Covenant.

The cap monitoring inspection was conducted on November 04, 2021 by an LAI geologist, and included observation of the pool building foundation, slab-on-grade, and pool for potential exposure pathways for human contact with the petroleum hydrocarbon-contaminated soil or groundwater within the “Affected Portion of the Property” as defined in the Environmental Covenant. The inspection included observations for evidence of conditions that could compromise the integrity of the pool building foundation, slab-on-grade, and the concrete pool lining as a cap over the underlying soil and groundwater including:

Condition	Evidence that cap integrity has been compromised (Y or N)
Cracking	N
Erosion	N
Animal Burrows	N
Settlement	N
Ponded Water	N
Sloughing	N
Seepage	N
Other	N

During this inspection, no cracks were observed in the pool lining, and there was no evidence that the integrity of the pool had been compromised. Observation of the exposed interior and exterior walls and concrete slabs-on-grade, including below-grade walls and the floor in the sump and filter room located in the southwest corner of the pool building, revealed no significant cracks, gaps, or evidence of structural damage. No petroleum-like odors, sheen, or staining were observed during the inspection.

Based on the inspection, there is no evidence that the cap has been compromised or that potential pathways exist for contact with the petroleum hydrocarbon-contaminated soil or groundwater within the Affected Portion of the Property.

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Please contact the undersigned if you have any questions regarding the ongoing or planned work at the subject property, or need any additional information.

LANDAU ASSOCIATES, INC.



Devan S. Brandt, LG
Senior Staff Geologist



Evelyn H. Ives, PE
Senior Engineer

DSB/EHI

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References

- City of Bothell. 2012. Model Restrictive (Environmental) Covenant; Grantor: City of Bothell; Grantee: State of Washington, Department of Ecology; Legal: Lot 2, Bothell BLA 2010-00006, AFN 20101230900001; Tax Parcel No.: 062605-9370-02. June 18.
- Ecology. 2012. Letter: Re: Determination of No Further Action at Lot 2, City of Bothell Boundary Line Adjustment Number BLA 2010-00006, Recorded Under Recording No. 20101230900001, in King County, WA (the "Pool Property"). From Russell E. Olsen, Toxics Cleanup Program, Washington State Department of Ecology, to Bob Stowe, Manager, City of Bothell, Washington. June 26.
- Hart Crowser. 2012. Remedial Action Report, BP Oil Station #11352, Bothell Way NE and NE 188th Street, Bothell, Washington. January 27.
- Leidos. 2020. Bothell BP-11352 Bioremediation Enhancement Solution Injection Work Plan, Bothell, Washington. Leidos Inc. February.