

September 12, 2022

Sunny Becker Site Manager Toxic Cleanup Program, NWRO State Department of Ecology PO Box 330316, Shoreline, WA, 98133-9716

RE: Proposed path forward for the Bothell Former Hertz (AKA AARENCO) Site

Ms. Becker:

Pursuant to Washington State Department of Ecology (Ecology) letter dated August 15, 2022, the City does hereby accept Ecology's proposal, with clarifications noted below, in reflection of having satisfactorily completed the remedial actions required by Agreed Order No. DE 15747:

- 1) The City requests to terminate and remove the environmental covenant on Parcel 9457200015 (Parcel #4) and Parcel 9457200050 ("Lot D") of the Bothell Former Hertz Site (Instrument # 20200513000356). As noted in 4 below, the City will continue to address risks on Lot D under Instrument # 20200513000357.
- 2) The City agrees to keep in place the Memorandum of Agreement (MOA), City of Bothell Contract #2277, with Ecology addressing contamination within right of ways.
- 3) The City will decommission HZ-MW-12 and BC-16 located on the Bothell Former Hertz site. Decommissioning shall follow state regulations, including submitting a NOI (Notice of Intent) with required fees to Ecology's Water Resources Program, and complying with WAC 173-160-460. It is recognized that wells HZ-MW-4 and HZ-MW-17 associated with the Site have been previously decommissioned.
- 4) The City will continue to address the potential risk from arsenic exceedances in BLMW-8R under the institutional controls (environmental covenant Instrument Number 20200513000357) for the Bothell Service Center Simon & Son (BSCSS) Site at Lot D.
- 5) The City will continue to use HZ-MW-1 only for HVOC monitoring under the institutional controls (environmental covenant Instrument Number 20200513000357) and compliance monitoring plan for the BSCSS Site.

6) The City has sampled and evaluated HZ-MW-19R (replacement well for HZ-MW-19) for TPH-Diesel and TPH-Oil with and without silica-gel cleanup (SGC) for compliance with site cleanup levels. Results without SGC indicate low concentrations of Heavy Oil <u>below</u> the state cleanup standard. In the non-SGC sample, the results were non-detect. Attached is a memo describing this sampling and analysis. The City requests that this well be decommissioned consistent with applicable Ecology regulations.

When notified by Ecology, the City will pursue to completion the activities noted above and understands that the Site will not be delisted due to remaining right of way contamination.

Upon providing confirmation of completion, the City requests that Ecology issue a letter on the status of Agreed Order No. DE 15747 to document that no further remedial action is required pursuant to that Agreed Order. The City will continue to undertake actions necessary to control and monitor the remaining contamination within the right of ways pursuant to the MOA.

For any further coordination regarding these matters, I may be contacted at <u>ryan.roberts@bothellwa.gov</u> or 425.471.1837.

Ryan Roberts

Ryan Roberts

Supervising Capital Project Engineer

Public Works Department

cc: Erin Leonhart, Public Works Director

Enclosures



MEMORANDUM

To: Sunny Becker

Site Manager

Toxics Cleanup Program

WA State Department of Ecology

Northwest Regional Office

PO Box 330316

Shoreline, WA 98133-9716

From:

Jeffrey Jensen

Project Geologist

Date: September 1, 2022

Re: Bothell Former Hertz Facility

Facility/Site No: 11687976 Agreed Order No. DE 15747 Groundwater Analytical Result Groundwater Well HZ-MW-19R John Kane, LHG Principal



JOHN R. KANE

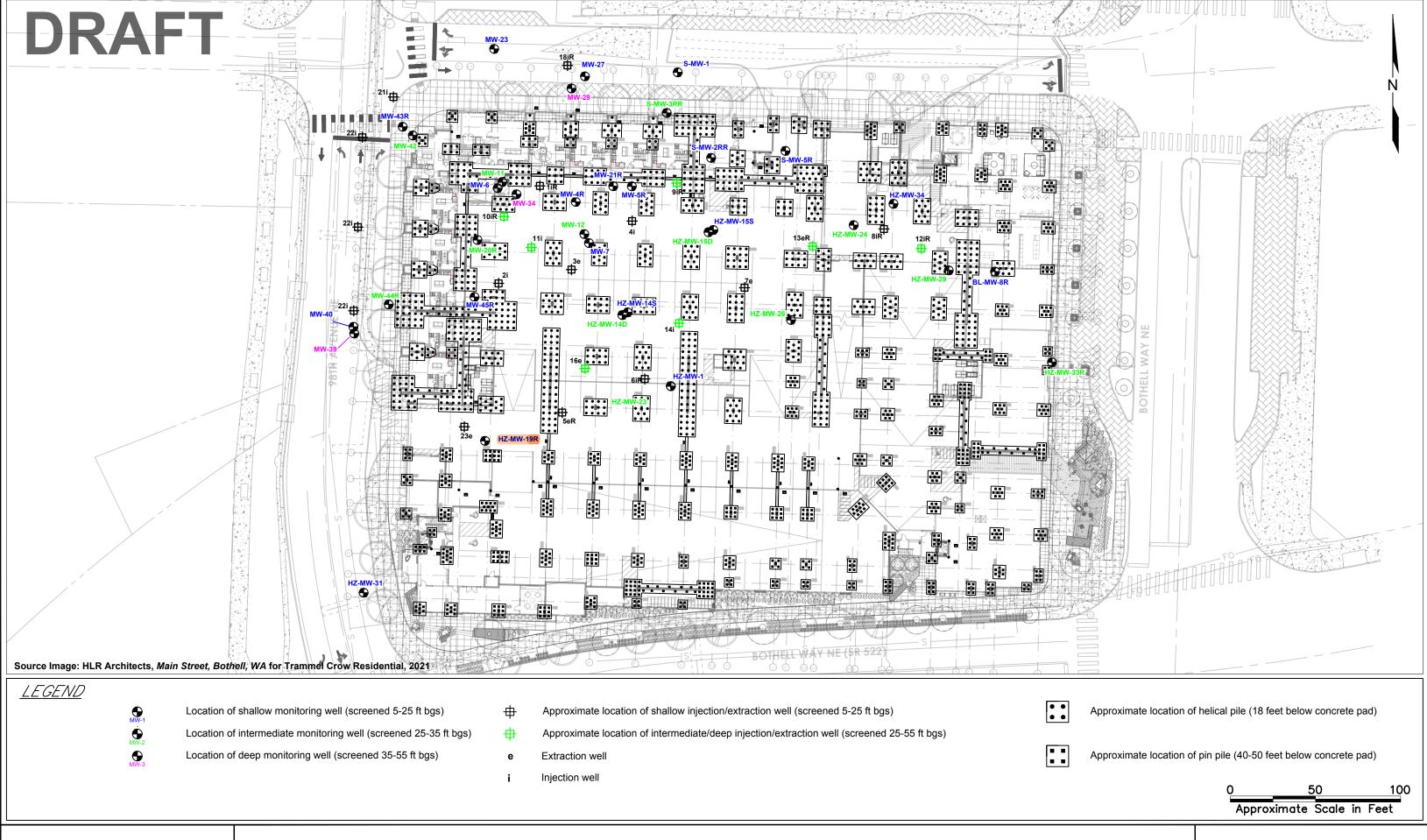
This memorandum provides groundwater analytical data results from sampling groundwater monitoring well HZ-MW-19R for Total Petroleum Hydrocarbons (TPH) Diesel and Oil (TPH-Oil) with and without silica gel cleanup (SGC).

In the Ecology letter dated August 15, 2022, Ecology proposed in bullet number 4: "Sample HZ-MW-19R (replacement well for HZ-MW-19) for TPH-Diesel and TPH-Oil with and without SGC. Evaluate if SGC results establish compliance with site cleanup levels."

On August 22, 2022, Jeffrey Jensen of Kane Environmental collected a groundwater sample from well HZ-MW-19R for analysis of TPH-Diesel and TPH-Oil with and without SGC. The analytical data results revealed a non-detectable of concentration of TPH-Diesel and a concentration of 270 micrograms per liter (UG/L) TPH-Oil, below the Washington State Model Toxics Cleanup Act (MTCA) Method A Groundwater Cleanup Level of 500 ug/L. The groundwater sample collected from HZ-MW-19R analyzed using silica gel cleanup resulted in non-detectable concentrations of TPH-Diesel and TPH-Oil. All analytical results were with required quality control limits.

Based on the analytical results, groundwater collected from HZ-MW-19R is in compliance with site cleanup levels, and we recommend decommissioning well HZ-MW-19.

FIGURE









August 25, 2022

Jeff Jensen Kane Environmental, Inc. 4015 13th Avenue West Seattle, WA 98119

Re: Analytical Data for Project 82306-7

Laboratory Reference No. 2208-230

Dear Jeff:

Enclosed are the analytical results and associated quality control data for samples submitted on August 22, 2022.

The standard policy of OnSite Environmental, Inc. is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

David Baumeister Project Manager

Enclosures



Date of Report: August 25, 2022 Samples Submitted: August 22, 2022 Laboratory Reference: 2208-230

Project: 82306-7

Case Narrative

Samples were collected on August 22, 2022 and received by the laboratory on August 22, 2022. They were maintained at the laboratory at a temperature of 2°C to 6°C.

Please note that any and all soil sample results are reported on a dry-weight basis, unless otherwise noted below.

General QA/QC issues associated with the analytical data enclosed in this laboratory report will be indicated with a reference to a comment or explanation on the Data Qualifier page. More complex and involved QA/QC issues will be discussed in detail below.

Date of Report: August 25, 2022 Samples Submitted: August 22, 2022 Laboratory Reference: 2208-230 Project: 82306-7

DIESEL AND HEAVY OIL RANGE ORGANICS NWTPH-Dx

Matrix: Water Units: mg/L (ppm)

				Date	Date	
Analyte	Result	PQL	Method	Prepared	Analyzed	Flags
Client ID:	HZ-MW-19R:W					
Laboratory ID:	08-230-01					
Diesel Range Organics	ND	0.21	NWTPH-Dx	8-23-22	8-25-22	
Lube Oil Range Organics	0.27	0.21	NWTPH-Dx	8-23-22	8-25-22	
Surrogate:	Percent Recovery	Control Limits				
o-Terphenyl	80	50-150				
Client ID:	HZ-MW-19R:W					
Laboratory ID:	08-230-01					
Diesel Range Organics	ND	0.21	NWTPH-Dx	8-23-22	8-24-22	X2
Lube Oil Range Organics	ND	0.21	NWTPH-Dx	8-23-22	8-24-22	X2
Surrogate:	Percent Recovery	Control Limits				
o-Terphenyl	79	50-150				

Date of Report: August 25, 2022 Samples Submitted: August 22, 2022 Laboratory Reference: 2208-230

Project: 82306-7

DIESEL AND HEAVY OIL RANGE ORGANICS NWTPH-Dx QUALITY CONTROL

Matrix: Water Units: mg/L (ppm)

				Date	Date	
Analyte	Result	PQL	Method	Prepared	Analyzed	Flags
METHOD BLANK						
Laboratory ID:	MB0823W1					
Diesel Range Organics	ND	0.16	NWTPH-Dx	8-23-22	8-23-22	
Lube Oil Range Organics	ND	0.16	NWTPH-Dx	8-23-22	8-23-22	
Surrogate:	Percent Recovery	Control Limits				
o-Terphenyl	100	50-150				
Laboratory ID:	MB0823W1					
Diesel Range Organics	ND	0.16	NWTPH-Dx	8-23-22	8-24-22	X2
Lube Oil Range Organics	ND	0.16	NWTPH-Dx	8-23-22	8-24-22	X2
Surrogate:	Percent Recovery	Control Limits			•	
o-Terphenyl	103	50-150				

o-Terphenyl 50-150 103

					Source	Perc	cent	Recovery		RPD		
Analyte	Res	sult	Spike Level		Result	Recovery		Limits	RPD	Limit	Flags	
DUPLICATE												
Laboratory ID:	SB08	23W1										
	ORIG	DUP										
Diesel Fuel #2	0.528	0.522	NA	NA		N	Α	NA	1	NA		
Surrogate:												
o-Terphenyl						109	108	50-150				
Laboratory ID:	SB08	23W1										
	ORIG	DUP										
Diesel Fuel #2	0.462	0.433	NA	NA		N	Α	NA	6	NA	X2	
Surrogate:												
o-Terphenyl						100	98	50-150				



Data Qualifiers and Abbreviations

- A Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.
- B The analyte indicated was also found in the blank sample.
- C The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.
- E The value reported exceeds the quantitation range and is an estimate.
- F Surrogate recovery data is not available due to the high concentration of coeluting target compounds.
- H The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.
- I Compound recovery is outside of the control limits.
- J The value reported was below the practical quantitation limit. The value is an estimate.
- K Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.
- L The RPD is outside of the control limits.
- M Hydrocarbons in the gasoline range are impacting the diesel range result.
- M1 Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.
- N Hydrocarbons in the lube oil range are impacting the diesel range result.
- N1 Hydrocarbons in diesel range are impacting lube oil range results.
- O Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result.
- P The RPD of the detected concentrations between the two columns is greater than 40.
- Q Surrogate recovery is outside of the control limits.
- S Surrogate recovery data is not available due to the necessary dilution of the sample.
- T The sample chromatogram is not similar to a typical .
- U The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
- U1 The practical quantitation limit is elevated due to interferences present in the sample.
- V Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.
- W Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.
- X Sample extract treated with a mercury cleanup procedure.
- X1 Sample extract treated with a sulfuric acid/silica gel cleanup procedure.
- X2 Sample extract treated with a silica gel cleanup procedure.
- Y The calibration verification for this analyte exceeded the 20% drift specified in methods 8260 & 8270, and therefore the reported result should be considered an estimate. The overall performance of the calibration verification standard met the acceptance criteria of the method.
- Y1 Negative effects of the matrix from this sample on the instrument caused values for this analyte in the bracketing continuing calibration verification standard (CCVs) to be outside of 20% acceptance criteria. Because of this, quantitation limits and sample concentrations should be considered estimates.

Z -

ND - Not Detected at PQL

PQL - Practical Quantitation Limit

RPD - Relative Percent Difference





Chain of Custody

- 080	Page	
	e	_
	of -	

			-					 							 								
Reviewed/Date	Received	Relinquished	Received	Relinquished	Received	Relinquished A 7	Signature								1 HZ-MW-19R: W	Lab ID Sample Identification	Sampled by: Jeff Jensen	Project Manager: Jeff Jensen + John Kener	Project Names on will Horks	82306 - 7	Company: Kare Europanula	Phone: (425) 883-3881 • www.onsite-env.com	Analytical Laboratory Testing Services 14648 NE 95th Street • Redmond, WA 98052
Re				1	4	K	Company								8142 1	Date Sampled S			Standard (7 Days)	2 Days	Same Day	(C)	Turnar (in w
Reviewed/Date					250	Kine	oany								 ILAS EM	Time Sampled Ma	(other)		(7 Days)	X 3 Days	ay 🔲 1 Day	(Check One)	(in working days)
					(1/										2	Matrix Numb	er of C	ontaine	ers	lays	ау		
					00												H-HCII		004 - 0	000			La
					Mu	8/11/12	Date		-	-	-					NWTF		STEX (8	021 8	260[])		_	bora
					Shun	121				-	+	+	+		×			Acid / S	G Clear	n-up 🗌)	-	tory
					29	-	Time										es 826						Nu
				8	9	105						-						Volatile:)			Laboratory Number:
Ch Ch	Da					L	Co			-	+	+				76 332 3		8270/S el PAHs)				_	0
Chromatograms with final report	Data Package:			,	boh	Please	Comments/Special Instructions									PAHs	8270/S	IM (low-					00
grams	kage:				7	E	ls/Spe									PCBs		ne Pest	icidos 9	001			N
with t	Standard				ξ.	repo	cial Ins			-	+	\dashv						ohorus F			D/SIM	-	30
final re	dard 🕽				1 h	to the	structio			-	+	1				Chlor	nated A	Acid Her	bicides	8151			
port					4	Ľ.	Suc									Total	RCRA N	/letals					
Ele	Level III				7	Ž										Total	MTCA I	√letals					
ctronic					1	6											Metals		1664				
Data C	Level IV				S: Ju	result				-	+			_	_ /			grease)		Δ.			
Electronic Data Deliverables (EDDs) 🗶	< 			0	without silver ge					+	+				*	3 (1)	Lin C		140	TI	161		
ables (E					6						+	1											
DDs)																							
X																% Mo	isture						