August 31, 2023

Mr. Michael Warfel
VCP Site Manager
Washington State Department of Ecology
PO Box 330316
Shoreline, Washington 98133-9716

RE: Cleanup Status Report
U-Haul Facility No. 801053
6720 Bothell Way Northeast
Kenmore, Washington
Atlas Project No. 1052105308
Washington Department of Ecology Facility No.: 15418523
Washington Department of Ecology VCP Project No.: NW2800
Washington Department of Ecology Cleanup Site ID No.: 8088

Dear Mr. Warfel:

Atlas Technical Consultants (Atlas) is pleased to provide this Cleanup Status Report to Washington State Department of Ecology (Ecology) on behalf of AMERCO Real Estate Company (AREC) for the above referenced facility, located at 6720 Bothell Way Northeast in Kenmore, Washington (Site). The objective of this Cleanup Status Report is to provide information on the status of cleanup as requested by Ecology in a letter dated July 31, 2023.

SITE DESCRIPTION

The Site is located in a mixed residential and commercial area. The Site is currently occupied by an active U-Haul facility. The Site is paved primarily with asphalt, with the exception of two concrete pads, one of which is located at the former dispenser islands at the south portion of the property and one concrete pad on the west portion of the property.

The Site is bounded to the north by a vacant commercial lot, formerly a bank, to the west by Jimmy John's sandwich shop, to the south by Bothell Way Northeast; across which is an auto repair shop and used car dealership (Erickson Family Auto, Best Auto Recovery), and a brewery supply store (Micro Homebrew), and to the east by Fix Auto Northshore (Collision Shop).

SYNOPSIS OF HISTORICAL INVESTIGATION AND REMEDIATION ACTIVITIES

Historical research indicates that three 4,000-gallon capacity underground storage tanks (USTs) reportedly used to store unleaded gasoline, premium gasoline, and diesel and one 8,000-gallon capacity UST reportedly used to store leaded gasoline at the Site. In 1996, the four USTs were removed from a common excavation located in the parking lot east of the existing building. The associated product conveyance piping and fuel dispensers (located south of the existing building) were also excavated and removed. Soil samples were collected in native soil (noted as glacial till) below each of the removed fuel USTs and additional soil samples were collected below the dispenser islands, product piping, and vent piping. Laboratory analytical results from the soil

samples at the base of the fuel UST basin indicated the presence of petroleum hydrocarbon constituents (total petroleum hydrocarbons [gasoline range; TPH-G] and toluene, ethylbenzene and xylenes [TEX] constituents) at concentrations exceeding Model Toxics Control Act (MTCA) Method A soil cleanup levels for unrestricted land uses. Heavy oil was also detected below the former west dispenser, although the concentration was not quantified. The greatest impacts were quantified in the native soil 12 feet below ground surface (bgs) at the former 4,000- gallon capacity unleaded gasoline UST: 42,600 milligrams per kilogram (mg/kg) TPH-g; 162 mg/kg toluene; 311 mg/kg ethylbenzene; and 4,280 mg/kg xylenes. The UST excavation was backfilled with imported fill material; the native soil (excavated during the UST removal activities) was used to bring the excavation to within approximately six inches of surface grade and the area was resurfaced with asphalt and concrete to match the surrounding grade level. Groundwater was not encountered during the UST removal activities (Blaes, 1996).

In addition to the fuel UST system removal, a 300-gallon capacity waste oil UST was decommissioned and removed from the property in 1996. The waste oil UST was located north of the existing building (Figure 2). After removal of the UST, soil samples collected from the base of the east and south sidewalls of the UST excavation were submitted for laboratory analysis. Heavy oil was quantified at 17,200 mg/kg in the soil sample collected at the base of the south sidewall at five feet bgs exceeding the MTCA Method A soil cleanup level for unrestricted land uses. As with the fuel UST excavation, the waste oil excavation was backfilled at the conclusion of confirmation sampling activities (Blaes, 1996).

In 2014, the Site was entered into the Voluntary Cleanup Program. Ecology's advisory opinion letter indicated that a remedial investigation should be performed at the site in order to assess the petroleum hydrocarbon impacts to the soil as quantified during the 1996 UST removal activities. Furthermore, it was requested that groundwater at the Site should be assessed for petroleum hydrocarbon impacts.

2015 – Cardno Phase II Assessment

In June 2015, Cardno oversaw the advancement of three soil borings and four additional borings subsequently completed as groundwater monitor wells MW-1 through MW-4 to further characterize soil and groundwater conditions at the Site. The borings and groundwater monitor wells were sited in locations intended to best assess soil and groundwater conditions at the former fuel and waste oil USTs and dispensers and at locations assumed to be down- and cross-gradient of the local groundwater flow direction. Total petroleum hydrocarbons as gasoline (TPH-g) and benzene compounds were only detected in one soil sample, collected from 10 feet below ground surface (bgs) in MW-2, above the MTCA Method A soil cleanup level for unrestricted land uses for gasoline containing benzene. Soil samples collected from the same boring below 10 feet bgs did not contain detectable concentrations of TPH-g, benzene or toluene constituents. No quantifiable concentrations of TPH-g, benzene, or toluene were detected in soil samples collected below 10 feet bgs. Xylenes were quantified at 15 and 20 feet bgs, and ethylbenzene was quantified at 20 feet bgs. These soil samples were collected below the static water level and the lack of quantifiable dissolved phase petroleum hydrocarbon constituents in groundwater samples at MW-2 suggest that the soil impacts are negligible. Dissolved petroleum hydrocarbons were only detected in the groundwater grab sample collected from soil boring B-1, although detections were limited to TPH-DRO and TPH-O and at concentrations below MTCA Method A cleanup levels. Dissolved phase petroleum hydrocrabons were not detected in groundwater samples collected at wells MW-1 through MW-4 following low-flow purging techniques.

2020 – ATC Atlas Supplemental Site Characterization

On March 3, 2020, ATC submitted a Work Plan to Address Existing Data Gaps (Work Plan) report for the Site. On April 9, 2020 Ecology issued an opinion letter based on its review of the document.

In December of 2020, ATC Atlas performed supplemental Site characterization activities outlined in the Work Plan dated March 3, 2020 to address data gaps. Atlas oversaw the advancement of 8 soil borings, three of which were converted to groundwater monitor wells MW-5 through MW-7.

2021 – Atlas Groundwater Monitoring Activities

Following the supplemental Site characterization activities, Atlas performed two quarters of groundwater monitoring and sampling in January and April of 2021.

INVESTIGATION AND CLEANUP STATUS

On July 31, 2023, Ecology issued a request for information on status of the VCP project. In their request for information letter, Ecology requested the *following information. Each request is followed by Atlas' response:*

- *Requested Item No. 1: Cleanup status report:*

  Atlas response: In Ecology's opinion letter dated April 9, 2020, Ecology noted that they concurred with the "Work Plan to Address Existing Data Gaps". Since the issuance of Ecology's opinion letter, dated April 9, 2020, Atlas personnel performed the proposed supplemental Site characterization activities. The remedial investigation activities were performed between December 16 and 18, 2020. Atlas then conducted two quarters of groundwater monitoring activities in January and April of 2021. Since the completion of groundwater monitoring activities in 2021, personnel changes and turnover have occurred within Atlas and AREC, which have led to temporary inactivity at the Site. Atlas has appointed a new point of contact (see response to Requested Item No. 4) to follow through with conducting additional groundwater monitoring activities, indoor air quality survey, and a compiled report summarizing activities that have taken place at the Site from December 2020 to the present, relative to Ecology's Model Remedy Requirements. This letter report is Atlas' Cleanup Status report, and summarizes historical activities and investigations, as well as proposed additional investigation and cleanup activities.

- *Requested Item No. 2: Any reports documenting the cleanup or other associated activities.*

  Atlas response: No reports have been prepared to describe the results of the remedial investigation activities completed from December 2020 to present. Atlas plans to generate a compiled report that includes these activities, along with addressing the items requested in Ecology's opinion letter dated April 9, 2020 as listed above.

- *Requested Item No. 3: A work plan and schedule for completing the cleanup*. The schedule for completing cleanup actions must be included with your response and should include significant milestones, such as remedial investigation results, quarterly groundwater compliance monitoring events, feasibility study evaluations, and anticipated

submittal of documents and requests for Ecology opinions. Contingencies and alternative approaches should be identified if the cleanup is not progressing within the expected time frame.

Atlas response: Atlas intends to conduct groundwater compliance monitoring events in the third and fourth quarter of 2023. During the fourth quarter groundwater monitoring event, Atlas will also conduct an indoor air quality survey. Each groundwater monitoring event will take one day. The samples will be submitted to the laboratory on standard turn-around time. After receipt of the final analytical reports, all results from December 2020 forward will be summarized in a draft report. The draft report will be submitted to AREC for review, then, after incorporating any comments, will be submitted to Ecology. The report will document any soil/groundwater impacts encountered during the December 2020 soil boring/well installation and subsequent groundwater monitoring events and indoor air quality survey. Conclusions regarding the results of the field activities will be included in the report. The report will include tables, maps, figures, field notes (where appropriate), and appendices pertinent to the data collected during the field activities. The report will be prepared and signed by a Washington-licensed professional geologist or engineer. Atlas anticipates delivering the compiled report to Ecology in March of 2024.

In accordance with Ecology's opinion letter, dated April 9, 2020, Atlas will evaluate the eligibility of the Site for a Soil or Ground Water Model Remedy in the report. We understand that if the Site qualifies, a Feasibility Study (FS) and Disproportionate Cost analysis (DCA) would not be required.

- *Requested Item No. 4: A VCP "Change of Contact Form" for each of the following VCP project contacts, if applicable*: project *manager, project billing contact, project consultant, project attorney, or property owner. A dated form should be submitted for each contact for which these project roles has changed.*

Atlas response: The new point of contact for this Site is Ms. Brianne Goulet of our Seattle, Washington office. Ms. Goulet is a registered geologist in the State of Washington with field experience at the Site. A completed "Change of Contact Form" is attached to this letter report. In addition, for redundancy and to mitigate loss of contact, we have included Mr. Robert Petrisko as a point of contact in our Arizona office.

Atlas appreciates the opportunity to be of service in this matter and looks forward to continuing our relationship with Ecology. If you have questions regarding this Clean Status report, please contact Brianne Goulet at (206) 498-9528 or Robert Petrisko.

Sincerely,

Atlas Technical Consultants

Brianne Goulet, L.G.
Project Manager
Brianne.Goulet@oneatlas.com
206.498.9528

Robert J. Petrisko
Client Manager, Principal
Robert.Petrisko@oneatlas.com
480.355.4624

Encl: Attachment 1 – Change of Contact Form

cc: Haley Ziesemer, AMERCO Real Estate Company (AREC)

Voluntary Cleanup Program

Washington State Department of Ecology
Toxics Cleanup Program

CHANGE OF CONTACT FORM

Use this form to notify the Department of Ecology (Ecology) of any changes to the designated points of contact for a project under the Voluntary Cleanup Program (VCP). Include any changes to the contact information for those persons (for example: phone number or address). Please submit only one form for each point of contact.

Step 1: IDENTIFY HAZARDOUS WASTE SITE

Please identify below the hazardous waste site for which you are providing new contact information. This information may be found on the VCP Agreement.

Facility/Site Name: U-Haul Facility No. 801053	
Facility/Site Address: 6700 Bothell Way NE. Kenmore, Washington	
Facility/Site No: 15418523	VCP Project No.: NS2800

Step 2: IDENTIFY CONTACT PERSON

Please identify the role of the person for whom you are providing new contact information. Check all that apply.

- ☒ Project Manager
- ☐ Project Attorney
- ☐ Project Billing Contact
- ☐ Property Owner
- ☐ Project Consultant
- ☐ Other – please specify:

Please provide below the new contact information for this person:

Name: Brianne Goulet			Title: Project Geologist
Organization: Atlas Technical Consultants			
Mailing address: 6347 Seaview Avenue NW			
City: Seattle		State: WA	Zip code: 98107
Phone: 206.498.9528	Fax:	E-mail: Brianne.Goulet@oneatlas.com	
Effective date: 08/31/2023			

Step 3: IDENTIFY PRIOR CONTACT PERSON (IF APPLICABLE)

Is the new contact person replacing an existing point of contact?

☒ Yes

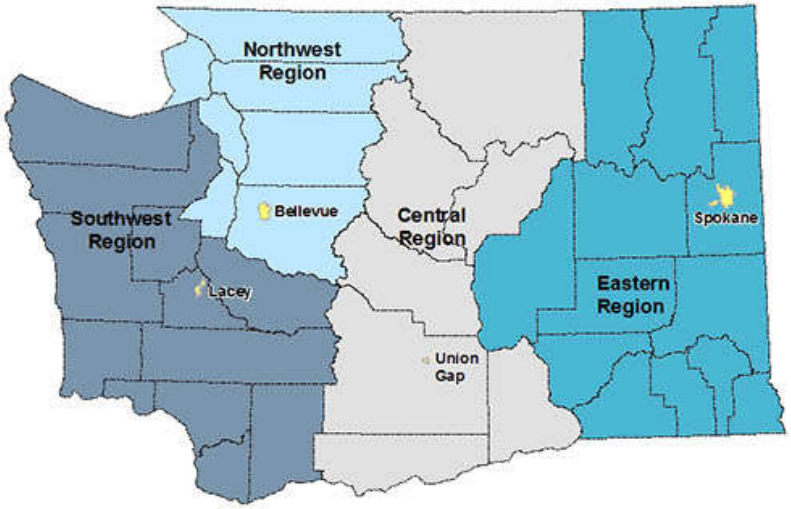
☐ No

If you answered "YES" above, please identify below the person who is being replaced:

Name: Edwin Vandegrift		Title: Principal Geologist
Organization: Atlas Technical Consultants		
Mailing address: 9185 South Farmer Avenue, Suite 111		
City: Tempe	State: AZ	Zip code: 85284
Phone: 602.321.0558	Fax:	E-mail: Edwin.vandegrift@oneatlas.com

Step 4: SUBMITTAL

Please mail your completed form to the Ecology site manager assigned to your Site. If a site manager has not yet been assigned, please mail your completed form to the Ecology regional office for the County in which your Site is located.



Northwest Region: Attn: VCP Coordinator 3190 160th Ave. SE Bellevue, WA 98008-5452	**Central Region:** Attn: VCP Coordinator 1250 West Alder St. Union Gap, WA 98903-0009
Southwest Region: Attn: VCP Coordinator P.O. Box 47775 Olympia, WA 98504-7775	**Eastern Region:** Attn: VCP Coordinator N. 4601 Monroe Spokane WA 99205-1295

If you need this publication in an alternate format, please call the Toxics Cleanup Program at 360-407-7170. People with hearing loss can call 711 for Washington Relay Service. People with a speech disability can call 877-833-6341.