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## MEMORANDUM

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**To:** Environmental Covenants Coordinator  
Washington State Department of Ecology Toxics Cleanup Program,  
Northwest Regional Office

**From:** Emily Guyer and Olivia Hargrave on behalf of Bridge33 Capital

**Date:** December 20, 2024

**Subject:** 2024 Annual Inspection Summary  
Former Harbour Pointe Cleaners Lynnwood (Facility Site ID 41352598)

**Project No.:** C3163

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Integral Consulting Inc. (Integral) performed an annual inspection of the Former Harbour Pointe Cleaners, located at 13619 Mukilteo Speedway, Suite B6, Lynnwood, Washington (Property), and the adjacent-west tenant space (Suite B5) in accordance with the environmental covenant (Recording Number 20150805000202) to assess potential exposure of subslab tetrachloroethene (PCE) and trichloroethene (TCE) that remains at concentrations above the soil cleanup levels for unrestricted land uses to air/water.

The Mukilteo Speedway Center was constructed in 1992 as a retail shopping center. Harbour Pointe Cleaners occupied tenant space Suite B6 (Attachment A) and operated as a dry-cleaning facility at the Property since its opening in 1992. From 1992 to 2007, the facility used chlorinated volatile organic compounds (CVOCs) such as PCE in its operations. Environmental assessment activities at the Property began in June 2006. PCE was detected in shallow, unsaturated soil and in soil vapor at concentrations above Method A soil cleanup levels for unrestricted land uses under the Washington State Department of Ecology's (Ecology) Model Toxics Control Act (MTCA) Chapter 70A.305. Under the guidance of MTCA, Cardno ATC performed a feasibility study and selected natural attenuation with institutional controls as the cleanup approach, including a subslab depressurization system (SSDS) and an environmental covenant.

The SSDS was installed in 2017 and operated for 17 months. After the SSDS shut down and the former dry-cleaning operation was vacated, two rounds of indoor air samples were collected from Suites B5 and B6. CVOC indoor air concentrations were below the relevant cleanup levels, MTCA Method B (for an unrestricted land-use scenario), in both events. Ecology issued a no further action (NFA)-likely opinion letter in May 2019, leaving the Property subject to an environmental covenant for PCE and TCE in soil that remains above

the soil cleanup levels for unrestricted land uses within the remedial action area (Attachment A). The environmental covenant was recorded on June 16, 2022 (Recording Number 20150805000202). Ecology issued an NFA opinion letter on September 20, 2022.

In accordance with the operations and maintenance requirements of the environmental covenant, Integral conducted the first annual inspection in December 2022. The 2022 inspection report was submitted to Ecology on December 21, 2022. Integral also collected a full set of subslab, indoor, and outdoor air samples in February 2023, the first winter after the environmental covenant was recorded, to comply with the Year 1 monitoring requirements of the environmental covenant. Integral conducted the 2023 annual inspection on December 8, 2023.

Integral conducted the 2024 annual inspection on November 14, 2024, specifically looking for the items listed in Exhibit E of the environmental covenant:

- Modifications to the facility
- New floor penetrations
- New cracks larger than ¼ inch in width
- Repairs made to floor slab over the past year
- Leaks of water from building roof drainage or stormwater drainage piping
- Leaks of water from piping associated with building plumbing
- Whether the HVAC/ventilation system is/has been operational
- Water infiltration through shallow soil.

The *Annual Inspection Summary Report Form* was completed (Attachment B) with input from an interview with Omar Halik, the property manager. There have been no changes to building occupancy since the 2023 inspection. Tenant space Suite B6 (Former Harbour Pointe Dry Cleaners) is unoccupied and the adjacent-west tenant space Suite B5 continues to be occupied by Mustache Milk Tea. During the inspection, the interior of each suite was visually assessed and photographed. The floor slabs in each space were visually inspected for new penetrations, cracks, or signs of water infiltration that may have occurred during the past year.

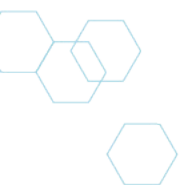
During the inspection and interviews, no modifications to the floor slab, floor penetrations, or cracks greater than ¼-inch were identified. There were no signs of water infiltration into the slab or leaks from roof drainage, stormwater drainage, or plumbing. The HVAC system was operational in each suite. Inspection findings are detailed in the inspection checklist

(adapted from the environmental covenant) in Attachment B. A photograph log is provided in Attachment C.

Based on the results of the inspection, contingency actions (Exhibit F of the environmental covenant), such as repair of the floor slab, are not recommended. Integral will conduct the next annual inspection in 2025.

**Attachments**

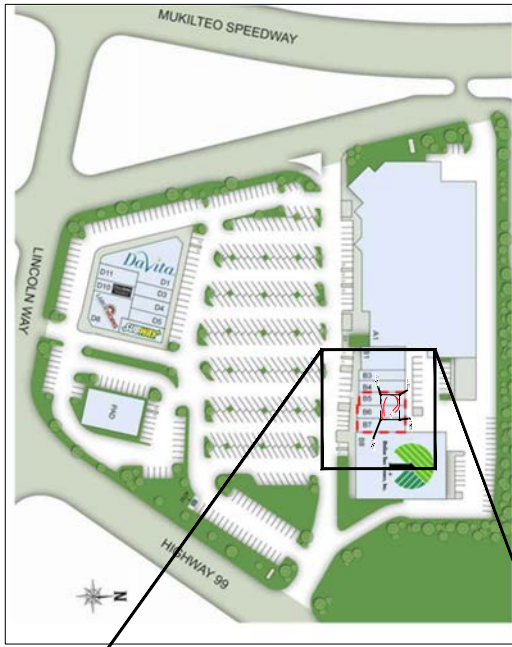
- Attachment A. Property Map with Remedial Action Area
- Attachment B. Annual Inspection Summary Report Form
- Attachment C. Photograph Log



## **Attachment A**

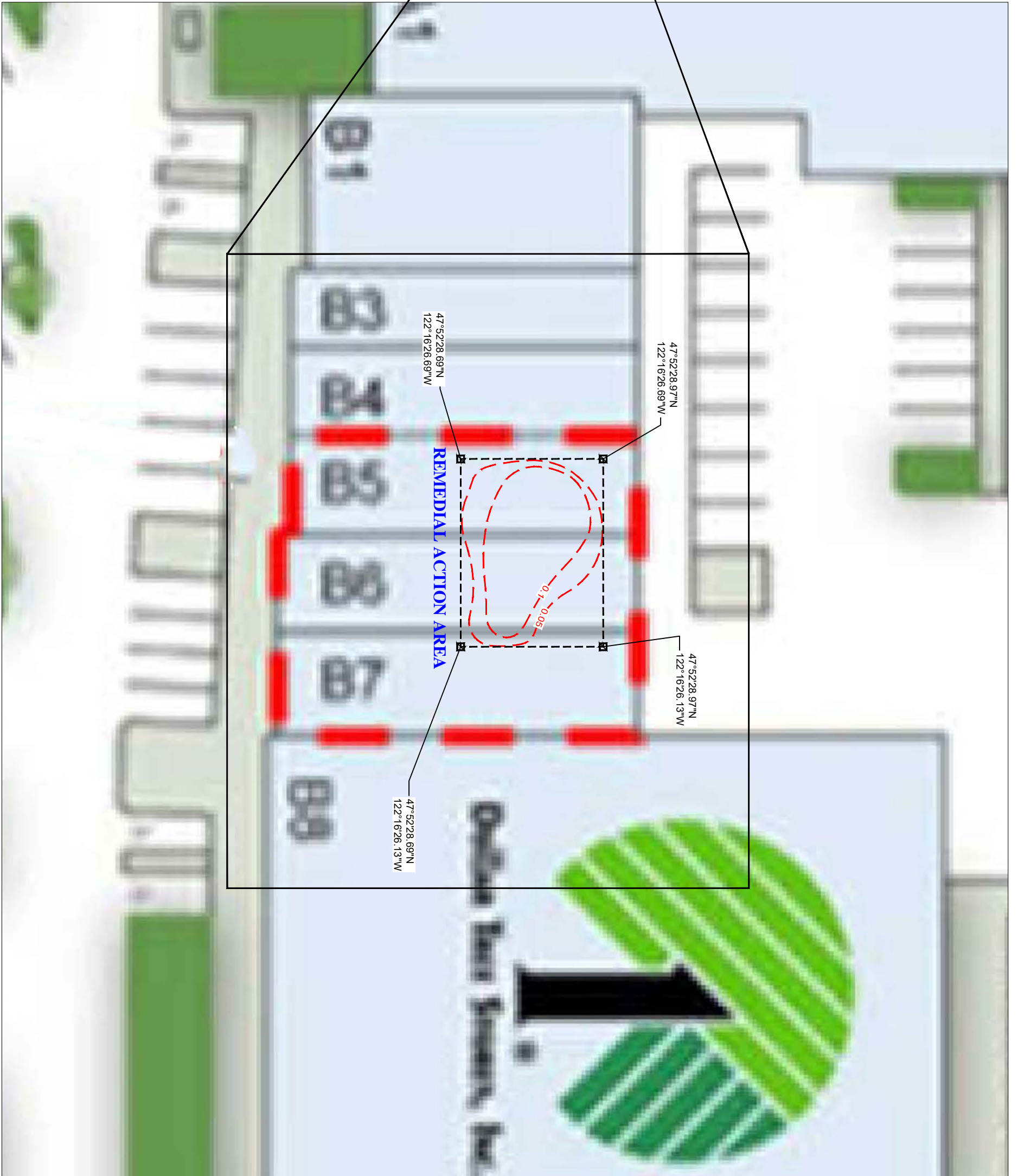
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Property Map with Remedial  
Action Area



**LEGEND**  
 47°52'28.97"N  
 122°16'26.69"W GPS COORDINATES  
 PCE ISOCONTOUR, mg/kg

NOT TO SCALE  
 NOTE: ALL LOCATIONS ARE APPROXIMATE



**PROPERTY MAP WITH REMEDIAL ACTION AREA**

FORMER HARBOUR POINT CLEANERS  
 13619 MUKILTEO SPEEDWAY  
 LYNNWOOD, WA

PROJECT NUMBER: NPWR18001	DATE: 11/20/20	FIGURE
APPROVED BY: ES	DRAWN BY: BK	

**ATC** 6347 Seaview Avenue NW  
 Seattle, Washington 98107  
 Ph: (206) 781-1449 \*\*\* Fax: (206) 781-1543

## **Attachment B**

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Annual Inspection Summary  
Report Form

## 2024 Annual Inspection Summary Report Form

### INSPECTION CHECKLIST (Adapted from the Environmental Covenant Exhibit E “Operations and Maintenance Plan and Annual Inspection Form”)

- 1. Have there been any modifications to the facility during the past year? Yes or No? If “Yes,” please describe:**

Suites B6 (Former Harbour Pointe Cleaners), B7: No.

B5 (adjacent-west tenant space/Moustache Milk Tea): No.

- 2. Have there been any new floor penetrations during the past year? Yes or No? If “Yes,” please describe:**

Suites B6, B7: No.

Suite B5: No.

- 3. Have any new cracks larger than ¼ inch in width been observed during the past year? Yes or No? If “Yes,” please describe:**

Suites B6, B7: No.

Suite B5: No.

- 4. Have any repairs been made to floor slab over the past year? Yes or No? If “Yes,” please describe:**

Suites B6, B7: No.

Suite B5: No.

- 5. Have any leaks of water from building roof drainage or storm water drainage piping been observed over the past year? Yes or No? If “Yes,” please describe:**

Suites B6, B7: No.

Suite B5: No.

- 6. Have any leaks of water from piping associated with building plumbing been observed over the past year? Yes or No? If “Yes,” please describe:**

Suites B6, B7: No.

Suite B5: No.

- 7. Is the HVAC/Ventilation system operational? Yes or No? If “No”, please describe. If “No,” when will it be operational?**

Suites B6, B7: Yes. The tenant spaces are unoccupied and the heating/cooling is not operated continuously, but the HVAC is operational.

Suite B5: Yes.

- 8. Is there evidence of water infiltration through shallow impacted soil? Yes or No? If "Yes," please describe:**

Suites B6, B7: No.

Suite B5: No.



## **Attachment C**

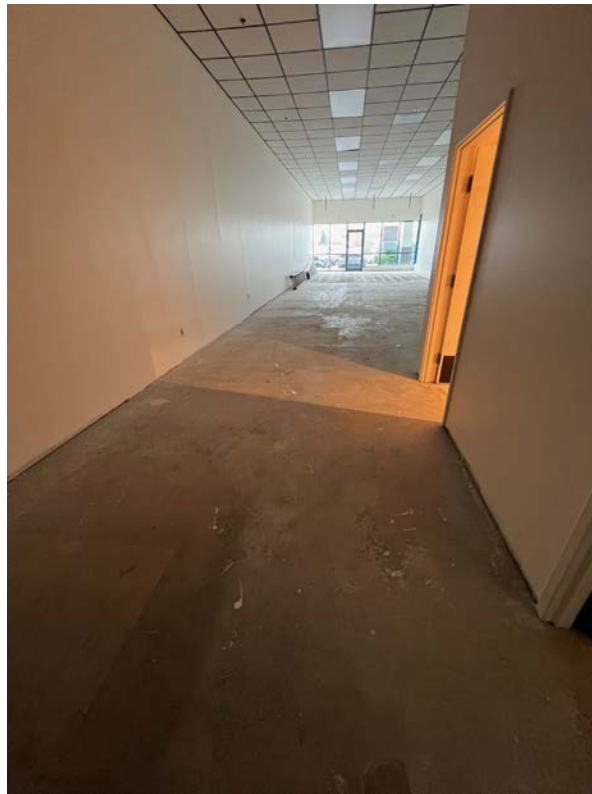
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### Photograph Log

**Former Harbour Pointe Cleaners Lynnwood  
13619 Mukilteo Speedway, Lynnwood, WA 98037  
Photographs from 2024 Annual Inspection**



Photograph 1. Floor Slab in Former Harbour Pointe Cleaners (Suite B6)  
(November 14, 2024)



Photograph 2. Floor Slab in Rear of Former Harbour Pointe Cleaners (Suite B6)  
(November 14, 2024)

**Former Harbour Pointe Cleaners Lynnwood  
13619 Mukilteo Speedway, Lynnwood, WA 98037  
Photographs from 2024 Annual Inspection**



Photograph 3. Floor Slab in Bathroom of Former Harbour Pointe Cleaners (Suite B6) (November 14, 2024)



Photograph 4. Floor Slab in Rear Utility Room of Former Harbour Pointe Cleaners (Suite B6) (November 14, 2024)

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Photographs from 2024 Annual Inspection**

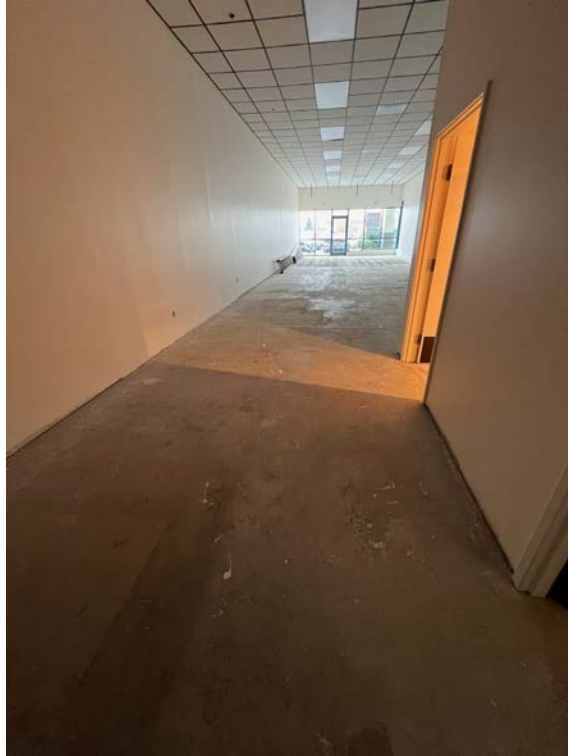


Photograph 5. Floor Slab in Front of Former Harbour Pointe Cleaners, Facing Northwest (Suite B6) (November 14, 2024)



Photograph 6. Floor Slab in Middle of Former Harbour Pointe Cleaners, Facing South (Suite B6) (November 14, 2024)

**Former Harbour Pointe Cleaners Lynnwood  
13619 Mukilteo Speedway, Lynnwood, WA 98037  
Photographs from 2024 Annual Inspection**



Photograph 7. Ceiling of Former Harbour Pointe Cleaners (Suite B6)  
(November 14, 2024)



Photograph 8. Floor Slab in Adjacent-West Tenant Space (Suite B5)  
(November 14, 2024)

**Former Harbour Pointe Cleaners Lynnwood  
13619 Mukilteo Speedway, Lynnwood, WA 98037  
Photographs from 2024 Annual Inspection**



Photograph 9. Floor Slab in Hallway of Adjacent-West Tenant Space (Suite B5)  
(November 14, 2024)

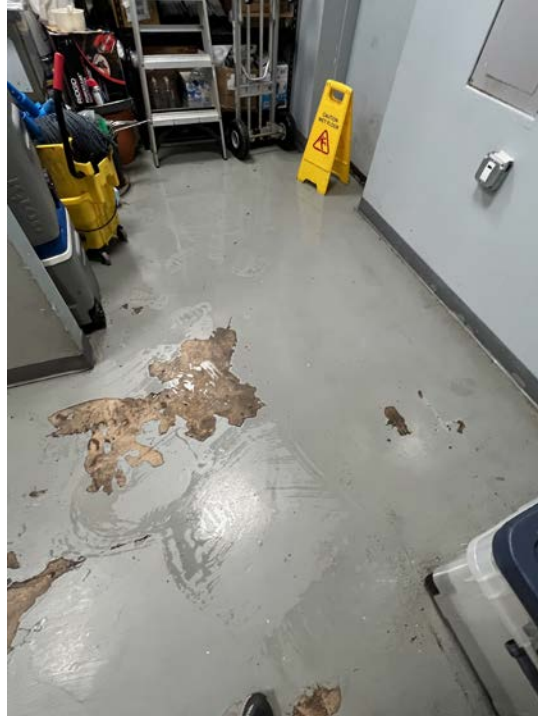


Photograph 10. Floor Slab in Kitchen of Adjacent-West Tenant Space (Suite B5)  
(November 14, 2024)

**Former Harbour Pointe Cleaners Lynnwood  
13619 Mukilteo Speedway, Lynnwood, WA 98037  
Photographs from 2024 Annual Inspection**



Photograph 11. Floor Slab in Rear Hallway of Adjacent-West Tenant Space (Suite B5) (November 14, 2024)



Photograph 12. Floor Slab in Rear Hallway of Adjacent-West Tenant Space (Suite B5) (November 14, 2024)

**Former Harbour Pointe Cleaners Lynnwood  
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Photographs from 2024 Annual Inspection**



Photograph 13. Floor Slab in Bathroom 1 of Adjacent-West Tenant Space (Suite B5) (November 14, 2024)



Photograph 14. Floor Slab in Bathroom 2 of Adjacent-West Tenant Space (Suite B5) (November 14, 2024)



**Former Harbour Pointe Cleaners Lynnwood  
13619 Mukilteo Speedway, Lynnwood, WA 98037  
Photographs from 2024 Annual Inspection**



Photograph 15. Floor Slab and Ceiling in Suite B7 (November 14, 2024)



Photograph 16. Bathroom Floor in Suite B7 (November 14, 2024)