SEPA CHECKLIST
CITY OF BOTHELL

ENVIRONMENTAL CHECKLIST
WAC 197-11-960

***Purpose of Checklist**:*

The State Environmental Policy Act (SEPA), chapter 43.21C Revised Code of Washington (RCW), requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

A. BACKGROUND INFORMATION

1. Name of proposed project, if applicable:

   Downtown Bothell Interim Cleanup Actions

2. Name of applicant:

   City of Bothell

3. Address and phone number of applicant and contact person:
   Steve Anderson
   Deputy City Manager
   18305 101st Ave. NE
   Bothell, WA 98011
   425-486-3256

4. Date checklist prepared:

   January 2010

5. Agency requesting checklist:

   Washington State Department of Ecology

6. Proposed timing or schedule (including phasing, if applicable):

   Interim cleanup actions are expected to begin in 2010 and will last through 2011.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

   The interim cleanup actions will precede the redevelopment of State Route (SR) 522 and SR 527 being completed by the City of Bothell during the period of mid-2010 through 2012 as a project known as the "Crossroads project". The interim actions could be completed as a component of the Crossroads Project. Permits for the Crossroads project have already been issued under a separate NEPA/SEPA action and other approvals.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

   The following environmental information has been prepared for the project:

   - **Draft Remedial Investigation/Feasibility Studies (RI/FSs) for three Agreed Order (AO) sites (Landing, Riverside, and Paint and Decorating) (Parametrix, December 2009)**
   - **Draft Interim Action Plans for three AO sites (Parametrix, December 2009)**

   The following related environmental information has been prepared for the Crossroads project:

   - **NEPA Documented Categorical Exclusion (DCE) Discipline Report for Hazardous Material, Geology and Soils (HWA GeoSciences, July 2009)**
   - **Biological Assessment (Perteet Inc., April 2009)**
   - **Critical Area Study and Mitigation Report (Perteet Inc., September 2009)**

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

Some environmental approvals associated with SR 522 and SR 527 improvements are pending.

10. List any government approvals or permits that will be needed for your proposal, if known.

- **National Pollutant Discharge Elimination System (NPDES) General Construction Permit Application. The permit obtained for the Crossroads Project will cover the interim actions.**
- **Permit from King County to discharge treated contaminated groundwater to the sanitary sewer. This permit will be applied for and obtained by the Contractor.**

[NOTE: The interim actions are procedurally exempt from certain local and state permits and approvals under RCW 70.105D.090 (Remedial actions — Exemption from procedural requirements).

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The project involves interim cleanup action at three AO sites (Landing, Riverside, and Paint and Decorating) located to the south of the current SR 522 alignment. A summary of contaminants of concern and interim cleanup action plans for each site is included in Attachment 1. Future use includes construction of the SR 522 realignment over portions of the sites.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The project is located within the City of Bothell's historic center. The three AO sites are surrounded by SR 522 to the north, east, and west and NE 180th Street to the south, as shown in the attached Figure 1. The project is located in township 26 North, range 5 east, Sections 7 and 8.

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site (underline): flat, rolling, hilly, steep slopes, mountainous, other.

The Landing site is predominantly flat and developed, with vegetated, gradual slopes towards Horse Creek along the eastern site boundary. The Riverside site is also predominantly flat and undeveloped but slopes steeply on the western boundary towards Horse Creek. The Paint and Decorating site slopes gradually to the south/southeast.

b. What is the steepest slope on the site (approximate percent slope)?

The steepest slopes within the project area exist next to Horse Creek, which is located between the Landing and Riverside sites, and are approximately 45 percent.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

Based on observations made during Landing site investigations, Site-specific soil stratigraphy typically consists of approximately 5 to 8 feet of silty sand fill over alluvial soil

consisting of interbedded silt and peat. Interbedded alluvial sand and silt was encountered between 8 and 20 feet below ground surface (bgs).

Based on observations made during Riverside site investigations, the soil typically consists of approximately 4 to 9 feet of silty sand to sandy silt fill with occasional debris over alluvial soil consisting of interbedded silt, sandy silt, peat, and silty sand to a depth of 20 to 25 feet bgs. A buried soil (paleosol) horizon was observed at some locations at the fill-alluvium contact. Much of the fill material is likely dredged spoils placed on the property from realignment of the Sammamish River in the 1960s. Below these deposits is predominantly dense sand with variable gravel to a depth of 40 to 50 feet bgs.

Based on subsurface investigations conducted at properties near the Paint and Decorating site, soils typically consist of silty sand fill over alluvial soil consisting of interbedded silt and peat. Interbedded alluvial sand and silt occurs below the peat. Much of the fill material is likely dredged spoils placed on the property from realignment of the Sammamish River in the 1960s.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Liquefaction-prone deposits and peat soils are located along the banks of the Sammamish River, which are south of the three AO sites (Imagine Bothell Comprehensive Plan 2004).

e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

Cleanup will require excavation of contaminated soil and placement of clean backfill at the three AO sites. This will include the excavation of up to 7,000 cubic yards of soil, as detailed in Attachment 1. Clean backfill will be generated from a state-approved source.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Temporary erosion may occur during and immediately following excavation activities. Erosion control will be achieved through the implementation of Best Management Practices (BMPs).

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

No new impervious surface will be added to the sites as part of the interim cleanup action.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Implementation of temporary erosion control measures and BMPs (such as filter fabric over catch basins) will be used during cleanup action.

2. Air

a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

Traffic associated with interim cleanup action activities may increase congestion, which would temporarily increase emissions from idling vehicles.

The project is located within a carbon monoxide maintenance area and is included in the Metropolitan Transportation Plan (MTP) for air quality. As such, the project will meet requirements of Puget Sound Air Quality Maintenance Plans.

There is also potential odor associated with removal of petroleum-contaminated soil.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

The overall project will include typical mitigation measures to minimize short-term air quality effects caused by dust and heavy equipment emissions. Mitigation measures include:

- **Require all City crews and contractors to comply with Puget Sound Clean Air Agency (PSCAA) regulations for dust control during construction.**
- **Maintain the engines of equipment according to manufacturers' specifications.**
- **Minimize idling equipment while not in use.**

3. Water

a. Surface:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Horse Creek, a tributary of the Sammamish River, flows from north to south between the Landing and Riverside sites. The Sammamish River is located south of the project area. Wetland A, a Category III wetland, is located nearby, south of NE 180th and east of the project area.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

Construction activities related to the excavation of contaminated soils at the Riverside site will occur within 200 feet of the described waters. Although a conditional use permit regulated under the City's Shoreline Management Program will be issued under the roadway construction project for construction activities occurring within 200 feet of the described waters, the interim cleanup actions are exempt from the procedural requirementsfrom the shoreline permit requirements. See, Section A.10 above, and RCW 70.105D.090.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

None.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

FEMA has mapped the Horse Creek channel as flood way and flood plain.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No.

b. Ground:

1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.

Dewatering activities may be required during excavation at the three AO sites. Dewatering water will be treated as necessary to meet discharge limits to the King County Metro sanitary sewer. The use of Temporary Erosion and Sediment Controls (TESCs) and BMPs will limit the extent of potential exposure and long-term effects to soils, groundwater, and surface waters.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

None.

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Possible stormwater runoff generated at the site during completion of interim actions will be properly controlled using temporary erosion control measure and applicable BMPs to eliminate off-site runoff potential.

2) Could waste materials enter ground or surface waters? If so, generally describe.

No. Proper control measures will be implemented.

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

During interim cleanup actions, Minimization Measures (MMs), BMPs, a Stormwater Pollution Prevention Plan (SWPPP), and a Spill Prevention Control and Countermeasures (SPCC) plan will be implemented and maintained throughout the construction period. SWPPP will include truck track-out prevention measures (wheel wash, quarry spall pad).

4. Plants

a. Check or circle types of vegetation found on the site:

_X_ deciduous tree: **alder, maple**, aspen, other

_X_ evergreen tree: **fir, cedar, pine, other**

_X_ shrubs

_X_ grass

____ pasture

____ crop or grain

_X_ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other

____ water plants: water lily, eelgrass, milfoil, other

_X_ other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

Some deciduous trees on the Paint and Decorating site will be removed during excavation.

c. List threatened or endangered species known to be on or near the site.

There are no plant species of federal concern or included in the Washington Natural Heritage Program database in the project area.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

No replacement trees or landscaping will be planted as part of the interim cleanup action.

5. Animals

a. Underline any birds and animals which have been observed on or near the site or are known to be on or near the site:

birds: hawk, heron, eagle, songbirds, **other**
mammals: deer, bear, elk, beaver, other
fish: bass, **salmon, trout**, herring, shellfish, other

b. List any threatened or endangered species known to be on or near the site.

Threatened and endangered species near the project area include the following species and type: Chinook salmon, Coho salmon, bull trout, and steelhead.

c. Is the site part of a migration route? If so, explain.

The project area is located within the Pacific Coast Flyway. This intercontinental migration corridor includes Puget Sound and supports a variety of species.

d. Proposed measures to preserve or enhance wildlife, if any:

None.

6. Energy and natural resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Electricity and petroleum fuels may be used to operate equipment during the interim cleanup action.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

None.

7. Environmental health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

The Landing, Riverside, and Paint and Decorating sites are under AOs to address soil and groundwater contamination related to historical releases of hazardous substances at the sites. Based on field investigations completed, Draft Interim Action Plans were prepared in December 2009 to address contamination at the three sites. A summary of contaminants of

concern and interim action plans for each site is included in Attachment 1.

1) Describe special emergency services that might be required.

It is not anticipated that special emergency services will be required for the project.

2) Proposed measures to reduce or control environmental health hazards, if any:

Current risks from contaminants in soil appear limited. A health and safety plan will be prepared for excavation and remedial action related to contaminated soil removal. The most likely exposure risk is to construction workers during soil-disturbing activities. BMPs, including dust suppression, will be utilized during the interim cleanup action to reduce contact with environmental health hazards. Based on the proposed future site development, the human and ecological receptors would have limited risk of direct contact because the portion of the sites containing contamination above regulatory standards would be covered by clean soil, roadway, buildings, or pavement.

Inhalation of vapors is not anticipated to be a health hazard during interim cleanup action because work will take place in an open-air environment.

Cleanup crews will be Hazardous Waste Operator (HAZWOPER) trained in proper handling, and worker safety procedures and practices during the remediation. They will also be wearing the appropriate level of personal protective equipment during operations.

Additionally, completion of possible additional final cleanup actions at each AO site in the future will address any remaining residual contamination.

b**.** Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

No existing noises in the area are expected to affect the project.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Construction vehicles and equipment will generate temporary noise during clearing, excavation, and placement of backfill. Interim cleanup action will occur during the hours permitted by the Bothell Municipal Code for construction noise.

3) Proposed measures to reduce or control noise impacts, if any:

Project construction hours will be limited to the City's standard construction hour requirements.

8. Land and shoreline use

a. What is the current use of the site and adjacent properties?

The three AO sites include commercial property, vacant parcels, and surface parking areas.

b. Has the site been used for agriculture? If so, describe.

No.

c. Describe any structures on the site.

Existing structures are comprised mainly of retail and general commercial.

d. Will any structures be demolished? If so, what?

All structures on the AO sites will be demolished as part of the Crossroads Project

e. What is the current zoning classification of the site?

Zoning designations for the AO sites include:

- **MVSO (Motor Vehicle Sales Overlay)**
- **P (Park)**

The three AO sites are also listed as part of the Downtown Bothell Community Activity Center, which provides shopping, personal and professional services, and dining and entertainment opportunities on a city-wide scale.

According to the King County Parcel Viewer, the current uses of the AO sites include restaurant/lounge, retail store, and vacant commercial.

f. What is the current comprehensive plan designation of the site?

The current comprehensive plan is the same as the current zoning classification of the sites, including MVSO and P designations.

g. If applicable, what is the current shoreline master program designation of the site?

The City's SMP designates "conservancy" shoreline designations on portions of the Landing and Riverside sites.

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.

The project area includes Horse Creek.

i. Approximately how many people would reside or work in the completed project?

Following the interim cleanup action, there will be no residences or businesses in the project area.

j. Approximately how many people would the completed project displace?

None.

k. Proposed measures to avoid or reduce displacement impacts, if any:

The interim actions will not cause any displacement impacts. The City's Downtown Subarea Plan promotes a mix of densities and housing types to meet the needs of people who desire to work and live downtown (Jones and Stokes 2008).

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

The interim actions provide environmental cleanup that is compatible with existing and projected land uses and plans, including the City's Comprehensive Plan, the City's Downtown Plan, and its Capital Improvement Program.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

The project does not specifically provide housing units, although the City's Downtown Subarea Plan promotes that a mix of housing income types be built in the project area.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

No housing units will be eliminated by the project.

c. Proposed measures to reduce or control housing impacts, if any:

None needed.

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

No new structures are associated with the project.

b. What views in the immediate vicinity would be altered or obstructed?

No views will be altered or obstructed.

c. Proposed measures to reduce or control aesthetic impacts, if any:

None needed.

11. Light and glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

None.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No light or glare will occur as a result of the finished project.

c. What existing off-site sources of light or glare may affect your proposal?

None.

d. Proposed measures to reduce or control light and glare impacts, if any:

None needed.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

The Park at Bothell Landing and the Sammamish River Trail are located near the project area, more than 300 feet away. These amenities offer both passive and active recreation opportunities. In addition, the Park at Bothell Landing includes playgrounds, restrooms, parking facilities, and an amphitheater. The 12-plus-acre park is perhaps most heavily used as a leisure area for bicyclists and walkers that pass through on the Sammamish River Trail.

b. Would the proposed project displace any existing recreational uses? If so, describe.

No.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

No impacts on recreation are expected during interim cleanup action because the excavation

areas are more than 300 feet away and cordoned off from these public areas.

13. Historic and cultural preservation

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

No individual properties in the project area are listed in the National Register of Historic Places, and no properties or districts have been previously determined eligible for the National Register.

b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

The Park at Bothell Landing, located south of the Landing site, includes four historic structures, which have the following designations:

- **Bothell's First Schoolhouse (Washington State Heritage Register – WSHR)**
- **William A. Hannan House (WSHR)**
- **Beckstrom's Log Cabin (WSHR)**
  Lytle House (Bothell Register of Historic Landmarks – BRHL)

No prehistoric archaeological sites, historic era archaeological sites, or Traditional Cultural Properties were identified within the Area of Potential Effect.

c. Proposed measures to reduce or control impacts, if any:

The interim actions project will not impact any historic, cultural, or archaeological resources.

14. Transportation

a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

The project area is served by SR 522 and NE 180th Street, and access is not expected to be affected.

b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

Downtown Bothell is a hub for transit services. Three transit agencies (Sound Transit, King County Metro, and Community Transit) operate 12 bus routes in the downtown area.

c. How many parking spaces would the completed project have? How many would the project eliminate?

The interim actions will not cause changes to any parking spaces.

d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

No.

e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

None.

g. Proposed measures to reduce or control transportation impacts, if any:

No transportation impacts are expected as a result of the interim action.

15. Public services

a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.

No.

b. Proposed measures to reduce or control direct impacts on public services, if any.

The project will not directly or adversely affect public services.

16. Utilities

a. Underline utilities currently available at the site: **electricity, natural gas, water**, refuse service, telephone, **sanitary sewer**, septic system, **other**.

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

All of services underlined above exist at the three sites. Water, sewer, and stormwater services are provided by the City of Bothell; electric and gas services provided by Puget Sound Energy; telephone service provided by Verizon; and cable television provided by Comcast.

No new utilities will be constructed as part of the interim actions.

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: _____

Date Submitted: 4/19/10

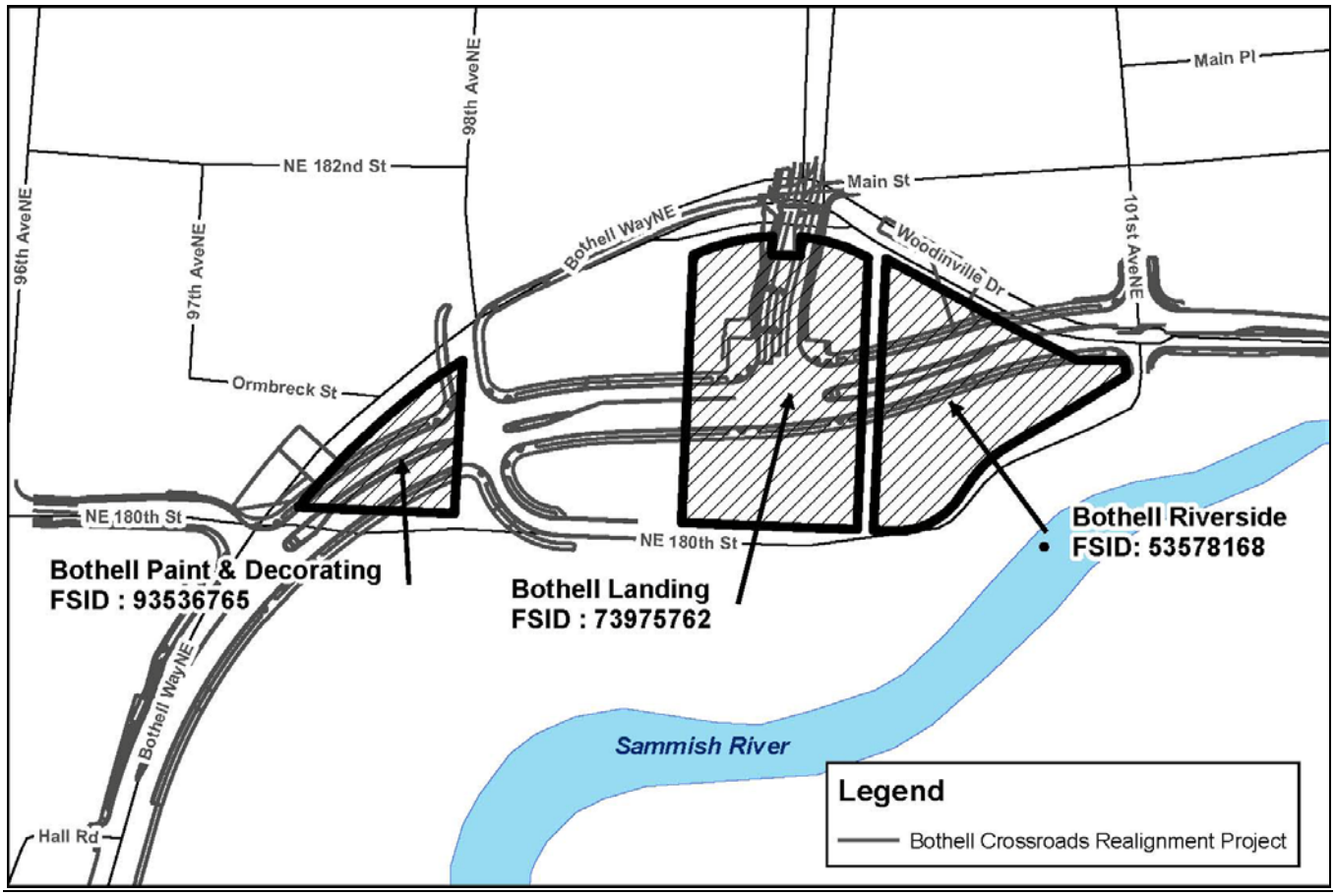

Figure 1. Map Showing Parcel Boundaries of Three Sites

Attachment 1—Summary of Chemicals of Potential Concern and Interim Cleanup Action Plans for Agreed Order Sites

The City of Bothell is currently under an Agreed Order (DE 6294, 6295, and 6296) with the Washington State Department of Ecology (Ecology) to provide cleanup action at three sites (Bothell Landing, Riverside, and Paint and Decorating) where there has been a release or threatened release of hazardous substances.

The following provides a brief description of existing environmental contamination and planned interim actions for the three AO sites:

Landing Site

The primary contaminants of concern in soil at the Landing site include:

- Total petroleum hydrocarbons (gasoline-, diesel-, and lube oil-range)
- Aromatic hydrocarbons (benzene, toluene, ethylbenzene, and xylenes)
- Semivolatile organic compounds (SVOCs; including naphthalenes)
- Metals (barium and lead)

For groundwater, chemicals of potential concern include:

- Total petroleum hydrocarbons
- Aromatic hydrocarbons
- Halogenated volatile organic compounds (HVOCs; from upgradient sources)

Remedial Investigation (RI) results for the Landing site are summarized below.

- Petroleum contamination in soil and groundwater at the former gas station area is relatively well defined within the parcel boundaries. Soil contamination extends into the SR 522 right-of-way where it is less well defined. The extent of the contaminated groundwater plume is limited to the vicinity of the Rotunda Park (similar to historical conditions).
- The backfill around the Horse Creek culvert does not appear to be a preferential pathway for contaminated groundwater.
- Horse Creek surface water does not appear to be significantly affecting nearby surface soils or groundwater.
- HVOCs, including tetrachloroethylene (PCE), trichloroethylene (TCE), and breakdown products, are migrating on to the Site and are present in groundwater throughout the central and northern portions of the Site. Concentration distributions indicate that the HVOCs are migrating from an upgradient source..

The proposed interim cleanup action at the Landing site includes excavation and removal of contaminated soil between 3 and 10 feet below ground surface (bgs). The interim action will consist of excavating an estimated 3,400 cubic yards of contaminated material and hauling the material to an off-site permitted facility for disposal. Groundwater is located at approximately 6 feet bgs; therefore, dewatering will be required to complete the excavation. Dewatering water will be treated to remove sediments and contaminants to meet discharge standards before being discharged to the sanitary sewer. Residual groundwater contamination will be treated using ORC™ to promote natural degradation of the petroleum compounds, and groundwater monitoring would be conducted quarterly for 1 year following the interim action.

It is anticipated that removal of the contaminant source and groundwater treatment would result in a shrinking groundwater plume. Final cleanup actions may be needed in the future to address any soil

contamination that cannot be fully addressed as part of the interim action, and to address groundwater contamination.

Riverside Site

The primary contaminant of concern at the Riverside site in soil is lube-oil-range petroleum hydrocarbons. Lube oil concentrations exceeding MTCA Method A cleanup levels for unrestricted land use are present in soil within the former excavation footprint to approximately 4 feet bgs. The interim action will consist of excavating an estimated 1,600 cubic yards of contaminated material and hauling the material to an off-site permitted facility for disposal. Modeling results completed for the RI/FS indicated the existing concentrations of lube-oil-range petroleum hydrocarbon in soil were protective of groundwater and did not pose a risk.

Lead in shallow soil and HVOCs in groundwater have also been identified on the site. The HVOCs in groundwater are undergoing anaerobic biodegradation and appear to be related to an upgradient source.

The proposed interim action at the Riverside site includes excavation and off-site disposal of contaminated soil. Dewatering and treatment of contaminated groundwater with disposal to the sanitary sewer may be required depending up the extent of contamination encountered during the interim action. Groundwater monitoring would be conducted quarterly for 1 year following the interim action.

Final cleanup actions may be needed in the future to address any soil contamination that cannot be fully addressed as part of the interim action, and to address groundwater contamination.

Paint and Decorating Site

Based on the RI/FS evaluation, the chemicals of potential concern for soil at the Site include:

- Metals (arsenic, barium, cadmium, chromium, lead, silver, and mercury)
- Total petroleum hydrocarbons (diesel- and motor oil-range)
- Aromatic hydrocarbons (benzene).

For groundwater, chemicals of potential concern include:

- Metals (arsenic and lead).

The proposed interim action plan for the Paint and Decorating site includes excavation of up to 2,000 cubic yards of contaminated soils and off-site disposal of the soil at a permitted disposal facility. Dewatering and treatment of contaminated groundwater with disposal to the sanitary sewer may be required depending up the extent of contamination encountered during the interim action.

Final cleanup actions may be needed in the future to address any soil contamination that cannot be fully addressed as part of the interim action, and to address groundwater contamination. Groundwater monitoring would be conducted to assess whether arsenic levels in groundwater exceed cleanup standards at the point of compliance.