EXHIBIT F

DRAFT CLEANUP ACTION PLAN

Als Auto Bothell Wexler Property
(aka Former Wexler Property Site)
A portion of parcel 945720-0050
Bothell, Washington
FSID # 63618231
CSID # 6418

Issued By:
Washington State Department of Ecology
Toxics Cleanup Program
Northwest Regional Office
3190 160th Avenue SE
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1.0 INTRODUCTION

This Draft Cleanup Action Plan (dCAP) report was prepared by Kane Environmental, Inc., (Kane Environmental) on behalf of the City of Bothell (the City) for submission to the Washington State Department of Ecology (Ecology) to clean up the area of soil and groundwater contamination associated with releases of petroleum at the contaminated site known as the “Als Auto Bothell Wexler Property” located in Bothell, Washington (herein referred to as “Former Wexler Property Site” or “Wexler”). A vicinity map and the Wexler location are shown on Figures 1, 2 and 3. This report was prepared in accordance with Ecology guidance, including the Remedial Investigation Checklist (Ecology Publication No. 16-09-006, Ecology 2016a) and Feasibility Study Checklist (Ecology Publication No. 16-09-007, Ecology 2016b). An initial site characterization was completed by Floyd Snider in August to September of 2010 and supplemental investigation work was completed by Kane Environmental in March 2018 to October 2018. Wexler characterization activities included sampling soil and groundwater from temporary soil borings and groundwater monitoring wells. It should be noted that Wexler is located (co-mingled) within the Bothell Service Center Simon & Son (BSCSS) Site and will be incorporated into the BSCSS Consent Decree cleanup, defined by the extent of petroleum and BSCSS halogenated volatile organic compounds (HVOC) contamination in soil and groundwater.

Given its collocation and commingling with the BSCSS site, it is the intent of the City of Bothell to integrate Wexler and the preferred remedial approach for the petroleum contamination identified on this Site into an amended version of the Consent Decree for the BSCSS site.

The City of Bothell is the current owner of Wexler and the City owns roadways and other parcels adjacent to Wexler. The City is in the process of revising the BSCSS Consent Decree to implement this draft Cleanup Action Plan to include Wexler with Ecology and the Attorney General's Office.

The Site is located entirely within an area that is referred to in this report as “Wexler” or “the Property”. The Property occupies the entirety of King County Assessor’s portion of parcel 945720-0050, which is presently owned by the City of Bothell. See Figure 3 for a Site Plan, showing the Site boundaries with respect to the surrounding properties. A Conceptual Site Model (CSM) is shown in Figure 4. The Property was previously owned by Wexler Bothell LLC. It should be noted that the original parcel boundaries were changed in 2010 as part of the Crossroads realignment on State Route 522. Previous reports describe the Wexler site parcel lines differently than current conditions.

Kane Environmental completed a Draft Remedial Investigation and Feasibility Study for the Site dated February 16, 2019. The Remedial Investigation delineated the extent of petroleum hydrocarbons and halogenated volatile organic compound (HVOC) impacts to both soil and groundwater at the Site. The primary source of current HVOC contamination on the Site is from releases associated with historical dry

cleaning operations on the BSCSS property, while the petroleum hydrocarbon contamination is from a former gasoline service station located on the western portion of the Wexler property. The Contaminants of Concern (COCs) in soil and groundwater are Gasoline (also referred to as Total Petroleum Hydrocarbons-Gasoline Range [TPH-G]), Benzene, Ethylbenzene, Total Xylenes (also referred to as Xylenes), and Naphthalene, and contaminants migrating from the BSCSS site, Tetrachloroethene (PCE), Trichloroethene (TCE), Cis-1,2 Dichloroethene (DCE) and Vinyl Chloride (VC).

Three remedial alternatives were evaluated in the draft Feasibility Study (draft FS) and are summarized below:

Alternative 1 – Excavation and Off-Site Disposal of Contaminated Soil and Pump and Treat of Contaminated Groundwater in Excavation

The proposed excavation area for Alternative 1, which is the area of soil contamination with petroleum COCs exceeding MTCA Method A Soil Cleanup Levels, is shown in Figure 5. The excavation will be conducted using a 1:1 sidewall slope. A large excavator with a sufficient reach to conduct the excavation as illustrated in Figure 5 will be used. Photoionization detector (PID) readings and odor screening will be used to screen for the potential presence of Wexler Site COCs. A high pressure fire hydrant line runs through the proposed excavation area; this line will either be exposed throughout the proposed excavation area and supported as the excavation proceeds, or, it will be removed and re-routed prior to completion of the excavation. Groundwater monitoring wells within the planned excavation area will need to be decommissioned prior to completion of the excavation.

Due to Wexler's location within and commingled with the BSCSS Site, and based the findings of previous subsurface investigations at the Site (Floyd Snider, 2010b; Kane Environmental, 2018), PCE and breakdown products are present in soil at the Site. PCE and TCE are listed dangerous wastes under the state Dangerous Waste regulations (WAC 173-303). Soils with any detectable concentrations of these listed wastes require special handling and disposal when excavated. If PCE and TCE concentrations are less than RCRA land disposal restrictions, and less than Method B direct contact levels, Ecology may issue a "Contained In" determination, allowing disposal of the soils at a Subtitle D landfill. Soils with higher concentrations will designate as Dangerous Wastes and must be sent to a Subtitle C facility for treatment, stabilization, and/or disposal. Based on the concentrations of PCE and TCE in soils on the Site documented by previous investigations of the Site (<1 ppm), soils classifying as Dangerous Waste are not considered likely to be encountered in the excavation. Additional pre-excavation soil sampling may be conducted in the area of planned excavation to gather additional information regarding the concentrations of PCE and breakdown products in contaminated soils on the Site. Soil confirmation sampling will be conducted following Ecology's Guidance for Remediation of Petroleum Contaminated Sites. Soil

confirmation samples will be analyzed for petroleum hydrocarbons, and other petroleum hydrocarbon chemicals of concern and HVOCs discussed in more detail in Section 3.2.

Groundwater encountered during the soil excavation will be pumped directly into a temporary holding tank. The tank water will be run through a sand filter to remove fine sediment from the water prior to treatment through activated carbon. Water will then be discharged into the sanitary sewer under King County permit requirements. As a contingency, an evaluation for the feasibility of pre- and post remedial action use of air sparging wells may be employed to enhance the removal of petroleum hydrocarbons below the water table within the petroleum hydrocarbon contaminated plume on the Wexler site. Vapors from the air sparging would be collected via soil vapor extraction. If utilized, the length of time for using an air sparging option will be determined by collecting SVE air samples from the sparging system, and the sampling details will be provided in the Engineering Design Report.

Alternative 2 – In-Situ Chemical/Biological Remediation with Vadose Zone Soil Excavation

This option focuses on *in-situ* remediation of petroleum contaminated soil and groundwater on the Wexler Site using chemical oxidants to degrade petroleum constituents and increase bio-availability, and enhancement of biological activity using an oxygen releasing remediation product. In-situ remediation techniques address only the contaminated soil in the saturated zone. Due to the presence of small areas of contaminated soil above the saturated zone, a limited remedial excavation to the depth to groundwater will also be required. See Figure 15 in the draft Wexler RI/FS for a depiction of this remedial alternative.

The following tasks would be included for *in-situ* chemical/biological remediation of petroleum constituents:

Vadose Zone Soil Excavation: In soil borings S-KSB-13 and S-KSB-16, soil contamination was identified above the highest level that groundwater reaches on the Wexler Site (approximately 4.5 feet bgs). In these locations, a remedial excavation will be conducted to the depth of groundwater (no deeper than five (5) feet bgs) to remove soils containing COCs at concentrations exceeding the MTCA Method A Soil Cleanup Levels. Sidewall samples and submitted for laboratory analysis for petroleum COCs to ensure that all petroleum COC-contaminated soils situated in the vadose zone are removed. Excavated soils would be transported for off-Site disposal at an appropriate location, following procedures described in Alternative 1 above. The estimated total mass of soil requiring off-Site disposal for this alternative is 250 tons.

Physical/Chemical Treatment: Injection of *PersulfOx* (Regenesis, Inc, San Clemente, CA) on the Property, for the remediation of petroleum contaminated soil and groundwater. *PersulfOx* includes chemical oxidizing agents which are capable of breaking down petroleum hydrocarbons as well as

releasing them from bound sediments, thereby increasing their solubility for extraction and their bio-availability for microbial degradation.

Biological Treatment: Injection of *ORC-Advanced (*Regenesis, Inc, San Clemente, CA) for the remediation of petroleum contaminated soil and groundwater. *ORC-Advanced* is designed to release oxygen into the contaminated saturated zone, thereby increasing aerobic microbial degradation of the remaining hydrocarbons. *ORC-Advanced* will be injected into the Site subsurface following the PersulfOx injection. No groundwater extraction will occur to allow the *ORC-Advanced* to remain in the formation to boost dissolved oxygen levels.

Alternative 3 – Air Sparging and Soil Vapor Extraction (AS/SVE)

Alternative 3 would not include any soil excavation or pumping of petroleum-contaminated groundwater. Air sparging involves introducing compressed air into the groundwater. This is achieved by injecting compressed air into wells that are screened in the saturated zone immediately below the depth of contaminated soil and groundwater. The introduction of air below the groundwater table enhances volatilization of contaminants dissolved in groundwater and sorbed onto saturated soils. Volatilized contaminants are then recovered via soil vapor extraction of the overlying vadose zone. Low molecular weight, volatile compounds such as gasoline range petroleum hydrocarbons and BTEX are generally amenable to air sparging and soil vapor extraction; higher molecular weight, semivolatile contaminants (including naphthalene) may be less amenable. Soil vapor extraction is the process of removing contaminants from the soil in the vapor phase, usually by applying a vacuum to the subsurface. This is done through the use of a series of wells which are placed throughout the area of contamination and screened above the groundwater table. The wells are connected to an air blower, which draws a vacuum. This action is enhanced when the surface is covered by a cap of asphalt and/or concrete, minimizing the amount of ambient surface air drawn into the system. With the reduced pressure, air begins to move through the subsurface drawing out the contaminant vapors. The withdrawn air will likely require treatment, depending on contaminant concentrations. Common processes for remediating this air include vapor phase carbon adsorption, catalytic converters, or thermal converters (oxidizers). The extracted vapors are run through this remediation system, and then discharged into the atmosphere under state and local permit requirements. Due to the presence of PCE and breakdown products in soil and groundwater at the Wexler Site, the air treatment system will need to be designed to remove both the petroleum Site COCs, and PCE and breakdown products.

Preferred Alternative

Alternative 1 – Excavation and Off-Site Disposal of Contaminated Soil and Pump and Treat of Contaminated Groundwater in Excavation

Based on the results of the Remedial Investigation and Feasibility Study conducted under MTCA and the application of the selection of remedy criteria, the Preferred Alternative chosen is Alternative 1, Excavation and Off-Site Disposal of Contaminated Soil and Pump and Treat of Contaminated Groundwater in Excavation, developed in accordance with WAC 173-340-350 through 173-340-390. Use of engineering controls and institutional controls are included as part of the remedial action, to be filed according to the schedule in the BSCSS amendment. Potential vapor intrusion, associated with future development, will be mitigated by the installation of vapor barriers and passive venting systems, or other vapor intrusion mitigation methods will be required in an environmental covenant. Buildings within the footprint of the HVOC contaminated plume, and buildings within 100 lineal feet from the plume, will require vapor barrier and passive venting. As a contingency, air sparging may be included in the remedial action.

The cleanup will include a total of two rounds of indoor air sampling. The first round of indoor air sampling will occur post-construction and pre-occupation of the buildings. The sampling procedures, and the analyses for both HVOCs and petroleum COCs, will follow sampling protocol provided in *Ecology's Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action (Review Draft Revised February 2016)* or the current guidance at the time of sampling. If indoor air HVOC and petroleum hydrocarbon COCs concentrations are above their respective screening levels in the first indoor air sampling round, a confirmational sampling round will be conducted within two weeks of the first round, to confirm the findings. If the confirmational sampling confirms the presence of HVOC and/or petroleum COCs in the indoor air, additional indoor air mitigation will be implemented. The details of the indoor air mitigation will be included in a corrective action report.

The second round of indoor air compliance sampling will occur prior to the completion of the draft Groundwater Closure Report. The indoor air sampling methodology, indoor air sampling results, and corrective actions for any additional indoor air mitigation (if any) for the first and second rounds of indoor air sampling will be documented in the Groundwater Closure Report.

1.1 Purpose

This document is the draft Cleanup Action Plan (dCAP) for the Wexler Site located Bothell, Washington. The general location of the Site is shown in Figures 1 and 2. A CAP is required as part of the site cleanup process under Chapter 173-340 WAC, Model Toxics Control Act (MTCA) Cleanup Regulations. The purpose of the dCAP is to describe the preferred cleanup alternative for the Site determined from the

RI/FS. More specifically, this plan:

- Describes the Site;
- Summarizes current site conditions;
- Summarizes the cleanup action alternatives considered in the remedy selection process;
- Describes the selected cleanup action for the Site and the rational for selecting this alternative;
- Identifies site-specific cleanup levels and points of compliance for each hazardous substance and medium of concern for the proposed cleanup action;
- Identifies applicable state and federal laws for the proposed cleanup action;
- Identify residual petroleum contamination remaining on the Site after cleanup, if present and potential restrictions on future uses and activities to ensure continued protection of human health and the environment;
- Discusses performance and compliance monitoring requirements and plans; and
- Presents the schedule for implementing the dCAP.

Under the terms of the consent decree and amendment with Ecology and the City of Bothell, a preliminary determination that a cleanup conducted in conformance with this dCAP will comply with the requirements for selection of a remedy under WAC 173-340-360.

1.2 Previous Studies

***Tank Removal and Hydrocarbon Contamination Assessment*, Applied Geotechnology, Inc. (AGI), January 25, 1990.**

On October 30, 1989, AGI oversaw the removal of three (3) 2,000-gallon gasoline USTs from the Site by Davis Industries, an excavation contractor retained by the Property owner at the time, A. A. Wexler. Petroleum contaminated soil was observed surrounding the USTs during removal. The removed USTs were composed of steel construction and observed to be corroded, but no holes were observed in the tank construction. AGI concluded that releases most likely occurred from fuel distribution lines/dispensers or from spills that occurred during UST filling. Approximately 250 cubic yards of petroleum contaminated soil were removed from the UST excavation and surrounding test pits. The maximum depth of the UST

excavation was eleven (11) feet below ground surface (bgs). Groundwater displaying a petroleum sheen was encountered in the excavation at approximately 7.5 feet bgs. No groundwater samples were submitted for laboratory analysis.

Following completion of excavation activities, AGI directed Davis Industries in the installation of a groundwater treatment system. This system consisted of an approximately seventy (70) foot long groundwater recovery trench located approximately ten (10) feet south of the remedial excavation that channeled groundwater to a sixteen (16)-inch diameter recovery sump. Water pumped from this sump flowed through an activated carbon treatment system, and was then pumped to two (2) re-introduction or re-injection points located in the northwest corner of the excavation and to the east of the excavation. No information regarding the operation of this system was provided in AGI's report. Features related to this groundwater treatment system are located within the area of a proposed remedial excavation. This excavation is identified as the preferred remedial alternative for addressing petroleum contamination on the Wexler Property, therefore, features related to this system will be removed during completion of this excavation.

***Groundwater Sampling Report*, HWA Geosciences, Inc. (HWA), January 6, 2006.**

From December 2004 to November 2005, HWA collected groundwater samples from the recovery sump (RS-1) and reinjection points (RP-1, located in the northwest corner of the UST excavation, and RP-2, located east of the UST excavation) installed by AGI and Davis Industries adjacent to the UST excavation on the Wexler Property in 1989. HWA reported that, after installation of the system, approximately 800 gallons of groundwater was extracted, treated, and reinjected by the system over an unspecified time period. Groundwater samples collected on December 16, 2004; February 4, 2005; March 13, 2005; and September 19, 2005 were analyzed for gasoline by method NWTPH-Gx and BTEX by method EPA 8021. Of these samples, three (3) of four (4) samples collected from RP-1 were reported to gasoline at concentrations exceeding the applicable MTCA Method A Groundwater Cleanup Level (1,000 micrograms per liter [ug/L, or ppb]), and one (1) of three (3) samples collected from RP-2 contained benzene at a concentration exceeding the applicable MTCA Method A Groundwater Cleanup Level (5 ppb).

The samples collected from these locations on November 23, 2018 were analyzed for gasoline by method NWTPH-Gx, diesel and heavy oil by method NWTPH-Dx, and for volatile organic compounds (VOCs) by EPA method 8260. These analyses revealed elevated concentrations of PCE and breakdown products trichloroethene (TCE) and cis-1,2-dichloroethene (cis-DCE) the sample collected from RP-1, all of which exceed their respective MTCA Method A (or, for cis-DCE, Method B [Non-Cancer]) Groundwater Cleanup Levels. Gasoline was not detected in this sample, therefore, HWA argued that exceedances of gasoline documented in samples previously collected from RP-1 were a result of "chlorinated ethenes" (PCE and

breakdown products) in these samples, rather than the presence of gasoline. No detections of any petroleum hydrocarbons, BTEX, 1,2-dibromoethane (EDB), 1,2-dichloroethane (EDC), or naphthalene were reported in any of the samples collected during this round of sampling.

Phase I Environmental Site Assessment (ESA). **Floyd Snider, June 30, 2010 (2010a).**

Floyd Snider performed a Phase I ESA of former King County Assessor's parcel 237420-0090 for the City of Bothell. The Property and Site fall within the former extents of this parcel. At the time of the Phase I ESA, this parcel was owned by Wexler Bothell LLC. At the time of this ESA, the Property was occupied by a one (1)-story building operated as a Schuck's Auto Supply and a small drive-thru espresso stand. As part of this ESA, Floyd Snider reviewed previous environmental reports for the Site, including the UST removal and groundwater sampling reports summarized above. Floyd Snider concluded that two recognized environmental conditions were applicable for the Property: the presence of PCE migrating from the west adjoining property onto the Site, and the presence of "residual levels of gasoline and benzene" in site groundwater greater than MTCA Method A Cleanup Levels.

Phase II Environmental Site Assessment. **Floyd Snider, September 10, 2010 (2010b).**

Floyd Snider conducted a subsurface investigation at the Wexler Property in behalf of the City of Bothell in August 2010. As part of this site assessment, Floyd Snider sampled soil and/or groundwater from a total of sixteen (16) direct push temporary soil borings advanced to depths of fifteen (15) to forty-five (45) feet bgs. Most of these borings were located immediately adjacent to the former UST excavation, however, several borings were also located in the central portion of the Property, its northwest corner, and in areas located to the north of the Property. Soil and groundwater samples were analyzed for gasoline and VOCs, and in select locations, diesel and heavy oil.

PCE was reported at concentrations exceeding the MTCA Method A Soil Cleanup Level in two (2) locations, both of which were near the northern edge of the former UST excavation (GP-9 and GP-10). No other exceedances of MTCA Method A Soil Cleanup Levels were reported for PCE and breakdown products. PCE and breakdown products were reported in groundwater samples collected from borings throughout the western portion of the Property at concentrations exceeding MTCA Method A Groundwater Cleanup Levels. Concentrations of PCE and breakdown products were generally highest in groundwater samples collected between ten (10) and fifteen (15) feet bgs, but exceedances in groundwater were documented in samples collected at all explored depths.

***Draft Remedial Investigation and Feasibility Study, Bothell Service Center Site*, October 4, 2017.**

Kane Environmental was retained by the City of Bothell to characterize HVOCs contamination in soil and groundwater related to releases of dry cleaning solvent that occurred on the former Bothell Service Center property, west adjacent to the Wexler. In this investigation, Kane Environmental determined that contamination related to these sources extended to the east and south of the former Bothell Service Center property, onto the Wexler Property. Concentrations of PCE in exceedance of the MTCA Method A Cleanup Soil Level (0.05 ppm) were documented in soil on the western portion of the Wexler Property, at depths between 5 and 25 feet bgs. Soil contamination with PCE at depths of less than 5 feet bgs (the typical depth of the water table) was found to be limited. PCE was also documented in groundwater samples collected from monitoring wells screened between 5 and 25 feet bgs at concentrations in exceedance of the MTCA Method A Cleanup Level on this portion of the Wexler property, at concentrations between approximately 10 and 340 ppb.

Overall, the findings of this investigation regarding the extent of PCE and other HVOCs contamination in soil and groundwater on the Wexler Property are consistent with the findings of other investigations of HVOCs contamination in this area, including Floyd Snider (2010, see summary above) and Kane Environmental (2018, see summary below). HVOCs soil data collected from locations on the Wexler Property during this investigation are included in Table 1, and the extents of HVOCs documented in soil and groundwater determined from HVOCs data collected during these investigations are shown relative to the petroleum contamination that defines the Wexler Property in Figures 9 and 12, respectively.

***Draft Supplemental Subsurface Investigation*, Kane Environmental, July 19, 2018.**

Kane Environmental was retained by the City of Bothell to conduct a supplemental subsurface investigation of petroleum contamination at the Property. Kane Environmental's investigation had two goals relevant to the Wexler Property: to further characterize the extent of soil and groundwater contamination associated with the former gasoline USTs located on the western portion of the Property, and to gather additional information regarding the extent of halogenated VOCs contamination on the Property originating from the west adjoining BSCSS site.

Results obtained from shallow soil samples indicate the presence of petroleum contaminants at concentrations below MTCA Method A Soil Cleanup Levels in the area to the east of the gasoline UST excavation. Results obtained from groundwater samples collected from temporary soil borings and groundwater monitoring wells indicate shallow groundwater contamination with gasoline (TPH-G) at concentrations exceeding the MTCA Method A Groundwater Cleanup Level extends approximately 25-30 feet east-southeast of the eastern boundary of the former gasoline UST excavation, but does not extend

beyond the Property boundary. BTEX and other petroleum-related VOCs were not detected at concentrations exceeding MTCA Method A Soil and Groundwater Cleanup Levels.

Results obtained from shallow soil samples collected from borings on the western portion of the Property indicate that PCE and breakdown products are present in shallow soil on the western portion of the Property, however, exceedances of MTCA Method A Cleanup Levels for PCE and breakdown products in soil were documented only to the northeast and north of the former UST excavation. TCE and/or cis-DCE were present in groundwater at concentrations exceeding the applicable MTCA Method A or Method B Non-Cancer Cleanup Levels (respectively) in a small number of locations located on the western portion of the Property. These analytical results confirm that a co-mingled petroleum and HVOC contaminant plume is present in groundwater on the Wexler Property.

1.3 Regulatory Framework

The Site is assigned Facility Number 63618231 and CSID # 6418.

Implementation of this Cleanup Action Plan will be under a consent decree amendment for Bothell Service Center Simon & Son Site, which originally addressed HVOC contamination. SEPA requirements for this CAP are presented in the SEPA Checklist for the Former Wexler Property Site (Attachment B).

2.0 SITE DESCRIPTION

2.1 Site History

The Wexler Property was reportedly vacant prior to 1947. Structures previously located at the Property include a one (1)-story service station building with apparent canopy, constructed in 1947 and demolished at an unknown date between 1970 and 1980 (Floyd & Snider, 2010a) and a commercial building constructed in the mid-1970s and demolished in 2014 (Floyd & Snider, 2010a; HWA, 2014). Another building was reportedly previously located within the footprint of this commercial building from the 1950s to the 1970s (Floyd Snider, 2010a). An espresso stand was also located near the northwest corner of the Property from at least 2006 to 2014.

The Property was owned by Eldon or A.A. Wexler from at least 1974 to 2014. During that period of time, the commercial building on the Property was operated as an auto parts retail store as an Al's Auto Supply, Schuck's Auto Parts, or O'Reilly Auto Parts store. Prior to 1974, the Property (or at a minimum, the Property containing the service station) was reportedly owned from an unknown date to 1974 by Carlton and Patricia Ericksen (Tuohy and Minor, 1989).

Releases of hazardous substances at the Property have occurred in the vicinity of three (3) gasoline USTs located on the southwestern portion of the Property (the current Wexler location).

Three (3) USTs were installed at the Property in 1947 in association with the service station that was also constructed during that year, and were reportedly used for storage of gasoline until at least 1970, when operation of the service station was ended (Floyd Snider, 2010a). In 1989, the USTs were removed from the Site and a release of gasoline was discovered to the soil and groundwater surrounding these USTs (AGI, 1990). A report that documented the removal of this UST system identified leaking distribution lines and spills of fuel during refilling of the USTs as probable sources of releases (AGI, 1990). Based on analytical results for soil and groundwater samples collected from the vicinity of the former location of these USTs, the released product has been identified as gasoline (diesel and heavy oil hydrocarbons are largely absent from these samples). A limited excavation of contaminated soil was conducted at the time of UST removal and a recirculating groundwater treatment system was installed, however, contaminated soil and groundwater presently remain in this area.

In 2010, the parcels were reconfigured as part of the Crossroads realignment project, and the Wexler Settlement Area now lies entirely within the new Lot D, which is currently being marketed for redevelopment.

2.2 Human Health and Environmental Concerns

The RI/FS identified exposure pathways of COCs at the Site. Based on the nature and the extent of contamination, the likely greatest potential risk to human receptors is dermal contact of soil and/or groundwater to construction workers during soil-disturbing activities. Another most likely exposure risk is inhalation of vapors during soil-disturbing activities or by commercial workers and/or residents.

These risks can be mitigated under a cleanup action that either removes the contaminants to levels that are protective to receptors which is preferred by the MTCA, or that places institutional or engineering controls to prevent exposure, following MTCA requirements.

Based on the nature and extent of contamination, the likely greatest potential risk to ecological receptors include incidental soil ingestion and dermal contact, as well as ingestion and direct contact with groundwater. However, based on the exposure pathways analysis, the land use on the Site and the surrounding area make wildlife exposure unlikely.

See Figure 4 for the Conceptual Site Model.

2.3 Cleanup Standards

The COCs in soil and groundwater for Wexler are described below. Commingled COCs from the BSCSS site are Tetrachloroethene (PCE), Trichloroethene (TCE), Cis-1,2 Dichloroethene (DCE) and Vinyl Chloride (VC).

The selected cleanup levels for the identified Constituents of Concern in soil are as follows:

MTCA Method A Soil Cleanup Levels for Unrestricted Land Uses (WAC 173-340-900, Table 740-1), and Protective of Groundwater Saturated:

- Gasoline [TPH-G]) 30 mg/kg
- Benzene 0.03 mg/kg
- Ethylbenzene 6 mg/kg
- Total Xylenes 9 mg/kg
- Naphthalene 5 mg/kg
- PCE 0.05 mg/kg
- TCE 0.03 mg/kg
- Cis-1,2 DCE 0.00515 mg/kg (Protective of Groundwater Saturated)
- VC 0.0000885 mg/kg (Protective of Groundwater Saturated)

MTCA Method A Cleanup Levels for Groundwater (WAC 173-340-900, Table 720-1), and MTCA Method B Noncancer:

- Gasoline [TPH-G]) 800 ug/L
- Benzene 5 ug/L
- Ethylbenzene 700 ug/L
- Total Xylenes 1000 ug/L
- Naphthalene 8.93 ug/L
- PCE 5 ug/L
- TCE 5 ug/L
- Cis-1,2 DCE 16 ug/L (MTCA Method B)
- VC 0.2 ug/L

The points of compliance are the locations at which cleanup levels for the Contaminants of Concern (COCs) must be attained to meet the requirements of MTCA and support issuance of an NFA determination for the Site. In accordance with WAC 173-340-740(6), the point of compliance for soil is all soil within the boundaries of the Site and to its furthest vertical extent for protection of groundwater. In accordance with WAC 173-340-720(8), the point of compliance for groundwater is all groundwater within the boundaries of the Site.

3.0 DESCRIPTION OF SELECTED REMEDY

3.1 General Description of the Cleanup Action

Based on the results of the remedial investigation and feasibility study conducted under MTCA (Kane Environmental, 2019) and the application of the selection of remedy criteria, the Preferred Alternative is Alternative 1 (Excavation and Off-Site Disposal of Contaminated Soil and Pump and Treat of Contaminated Groundwater in Excavation), developed in accordance with WAC 173-340-350 through 173-340-390. Alternative 1 will be implemented as the primary alternative for source control and plume remediation. Furthermore, a vapor barrier, or other vapor intrusion mitigation measures, will be implemented in the areas of the building development as part of the environmental covenant.

3.2 Excavation and Off-Site Disposal of Contaminated Soil and Pump and Treat of Contaminated Groundwater in Excavation

The proposed excavation area for Alternative 1, which is the area of soil contamination with petroleum COCs exceeding MTCA Method A Soil Cleanup Levels, is shown in Figure 5. The excavation will be conducted using a 1:1 sidewall slope, and a large excavator with a sufficient reach to conduct the excavation as illustrated in Figure 5 will be used. If necessary, a trench box may be used to remove petroleum contaminated soil deeper than 15 feet bgs. A vacuum truck may also be used to remove contaminated soil in portions of the excavation difficult to reach with the excavator. Soil will be placed directly into truck and trailer for direct transport to the licensed disposal facility to minimize soil stockpiling or transloading of soil at the Site.

A high pressure fire hydrant line runs through the proposed excavation area; this line will likely be left in-place and supported or it may be removed prior to completion of the excavation and replaced during site restoration. Groundwater monitoring wells within the planned excavation area will be decommissioned prior to starting the excavation, and either permanently decommissioned or replaced after completion of the remedial action.

Due to Wexler's location within and commingled with the BSCSS Site, and based the findings of previous subsurface investigations at the Site (Floyd Snider, 2010b; Kane Environmental, 2018), PCE and breakdown products are present in soil at the Wexler site. PCE and TCE are listed dangerous wastes under the state Dangerous Waste regulations (WAC 173-303). Soils with any detectable concentrations of these listed wastes require special handling and disposal when excavated. If PCE and TCE concentrations are less than RCRA land disposal restrictions, and less than Method B direct contact levels, Ecology may issue a "Contained In" determination, allowing disposal of the soils at a Subtitle D landfill. Soils with higher concentrations will designate as Dangerous Wastes and must be sent to a Subtitle C facility for treatment, stabilization, and/or disposal. Based on the concentrations of PCE and TCE in soils on the Site documented by previous investigations of the Site (<1 ppm), soils classifying as Dangerous Waste are not considered likely to be encountered in the excavation. Additional pre-excavation soil sampling will be conducted in the area of planned excavation to gather additional information regarding the concentrations of PCE and breakdown products in contaminated soils on the Site.

Overburden soils that based on field screening are considered unlikely to contain COCs will be stockpiled on the Wexler Property and tested to determine the concentrations of COCs as well as PCE and breakdown products. PID readings and odor screening will be used to screen for the potential presence of Wexler and BSCSS Site COCs. The number of samples collected from soil stockpiles for testing will follow the guidance in Table 6.9 of *Guidance for Remediation of Petroleum Contaminated Sites* (Ecology Publication 10-09-057, Revised June 2016). Soils that contain PCE or any breakdown products at concentrations that exceed laboratory reporting limits will be transported to an appropriate off-Site disposal location as described above. Soils that do not contain detectable PCE or breakdown products will be classified according to Table 12.1 of *Guidance for Remediation of Petroleum Contaminated Sites* (Ecology Publication 10-09-057, Revised June 2016). Category 1 and 2 soils will be reused as excavation backfill as appropriate; other soils will be transported to an appropriate off-Site disposal location. As a contingency, either pre- or post excavation activity, the feasibility for the use of air sparging wells may be evaluated to enhance remediation of the petroleum hydrocarbons in soil and groundwater. Shallow soil vapor extraction wells may be placed to remove petroleum hydrocarbons released by the air sparging wells. The duration will be determined by sampling of the SVE wells with the sampling approach provided in the Engineering Design Report.

All soils containing concentrations of petroleum COCs exceeding MTCA Method A Soil Cleanup Levels throughout the Site will be removed by excavation to concentrations below their individual cleanup levels, even those located beneath 15 feet bgs (the standard vertical point of compliance for direct contact). This will be done to ensure that source soil with petroleum hydrocarbons concentrations above individual cleanup levels that may be contributing to groundwater contamination are removed, and because (based on existing data) these contaminated soils may extend to approximately seventeen (17) feet bgs, only a few feet beyond the 15-feet bgs. Multiple soil clearance samples will be collected from the bottom and sidewalls of the excavation and submitted for laboratory analysis to confirm that all

.

soils containing concentrations of petroleum COCs exceeding MTCA Method A Soil Cleanup Levels have been removed. The spacing and distribution of clearance soil samples will follow guidelines established in Section 6.8.3 of the Ecology *Guidance for Remediation of Petroleum-Contaminated Sites* (Ecology, 2016). Compacted overburden soils designated as reusable based on laboratory analytical results may be used for near surface fill material. Clean imported fill material, with laboratory analyses confirming that the source of the fill is clean prior to placement at the site, will replace the excavated contaminated soil. The total volume of soil requiring off-Site disposal in this alternative is estimated to be 1,300 tons. An estimated 2,000 to 3,000 gallons for groundwater will be pumped and placed in the temporary holding tank for treatment prior to discharge to the sanitary sewer.

Due to the shallow depth to groundwater at Wexler (four (4) to five (5) feet bgs), dewatering of the excavation area will be required to complete the remedial excavation. Dewatering will be achieved by dewatering pumps placed directly in the excavation to remove water that seeps into the excavation. Water pumped from the excavation will be stored using the existing temporary holding tanks on the eastern portion of the BSCSS site. Water will be tested for site COCs as required by King County Industrial Waste in order to obtain authorization for discharge of water to the King County sanitary sewer system. If required, water will be passed through a sand filtration and activated carbon purification system prior to discharge to sanitary sewer.

Removal of groundwater from the remedial excavation will serve as an interim remedial action to address groundwater contamination associated with the HVOC COCs, but will complete the remedial action for the petroleum contaminated groundwater at the Wexler Settlement Area. Following the completion of the excavation, all soil with concentrations of petroleum COCs at concentrations exceeding MTCA Method A Soil Cleanup Levels will have been removed from Wexler. The excavation of this soil constitutes the removal of all source material for groundwater contamination with petroleum COCs. The combined effects of pumping of contaminated groundwater from the excavation and removal of source soil will bring the concentrations of petroleum COCs in groundwater into compliance with MTCA Method A Groundwater Cleanup Levels. Excavation pit groundwater pumping will stop when hydrocarbon soil concentrations are determined to be below their respective cleanup levels and pit water sample analyses are below respective petroleum COC cleanup levels.

Prior to backfilling of the excavation with clean gravel borrow mined from a quarry, approximately 1,000-gallons of the bioremediation product, CarbStrate©, currently being used for the BSCSS HVOC plume, will be placed in the excavation. Following backfilling of the excavation, up to two (2) groundwater monitoring wells may be installed in the backfilled excavation, and selected perimeter groundwater monitoring wells decommissioned prior to excavation activities may be replaced with concurrence from Ecology. Compliance

groundwater monitoring for HVOCs for BSCSS and petroleum hydrocarbon COCs for Wexler will be conducted using groundwater monitoring well locations provided in Attachment A of this document.

Groundwater samples will be collected from these monitoring wells on a quarterly basis and analyzed for Wexler petroleum COCs. Quarterly monitoring will be conducted at Wexler compliance monitoring wells as part of the BSCSS groundwater compliance monitoring, until four consecutive quarters of compliance (or an alternative duration specified by Ecology) with selected groundwater cleanup levels (MTCA Method A Groundwater Cleanup Levels) is achieved for all petroleum COCs. These groundwater monitoring wells will then either be decommissioned or left in-place for continued use in monitoring remediation progress of HVOC COCs for BSCSS compliance monitoring with concurrence from Ecology.

The estimated timeframe to petroleum COCs compliance in soil is within the timeframe of the soil excavation activity (approximately 2 weeks) by the collection of soil confirmation samples. The estimated timeframe to petroleum COCs compliance in groundwater at Wexler for Alternative 1 is 1 year (4 quarters) following completion of the remedial excavation. Remnant petroleum COCs contamination in groundwater is not expected to exceed selected groundwater cleanup levels, therefore, an extended period of compliance monitoring is not anticipated to be necessary. The estimated cost for implementation of Alternative 1 is $1,200,000.

3.3 Post-Remediation

The soil excavation and groundwater removal is expected to attain MTCA cleanup levels for petroleum COCs in soil within the timeframe of the soil excavation activity, approximately 2 weeks, and 1 year (4 quarters) for petroleum hydrocarbons in groundwater. Although petroleum hydrocarbon rebound is considered unlikely since all of the petroleum hydrocarbon soil will be removed, if areas of Wexler containing residual contamination are not in compliance with cleanup levels despite remediation efforts in the CAP and an unlikely rebound of petroleum hydrocarbons above cleanup levels in groundwater appears, engineering and/or institutional controls (environmental covenant) in order to be protective, may be added to compliance groundwater monitoring.

3.4 Permitting

The soil removal and excavation water discharge to sewer will be properly permitted through the appropriate regulatory agencies, including the City of Bothell and King County Industrial Waste for water discharge permit.

3.5 System Performance Criteria and Performance Monitoring

For baseline and system performance monitoring data, groundwater samples will be collected from the select monitoring wells proposed herein listed in Attachment A. Water from the excavation will be sampled by discrete grab samples to determine that petroleum hydrocarbons in the excavation water are below cleanup levels. All key monitoring wells will be analyzed for the following:

- Gasoline [TPH-G])
- Benzene
- Ethylbenzene
- Total Xylenes
- Naphthalene
- PCE
- TCE
- Cis-1,2 DCE
- VC
- Ammonia-nitrogen (EPA 350.1).
- Sulfate-sulfur (EPA 375.4 MOD).
- Methane/ethene/ethane (low level analysis via Microseeps, Inc.).
- Total organic carbon (TOC, multiple methods).
- Dissolved iron and chloride

4.0 HEALTH AND SAFETY PLAN

A Site-Specific Health and Safety Plan (HASP) will be followed when performing field activities. The HASP will comply with the requirements of Title 29 of the Code of Federal Regulations, Part 1910 (20 CFR 1910), collectively referred to as “Hazardous Waste Operations and Emergency Response (HAZWOPER)”. The HASP identifies physical, industrial, chemical and biological hazards, establishes hazard monitoring action levels, specifies the required Personal Protective Equipment (PPE), and includes a map showing the route to the nearest hospital with an emergency medical facility. The HASP will be in the Engineering Design Report. A copy of the HASP will be maintained at the work area, and all visitors will be provided a health and safety briefing prior to commencing with their activities.

5.0 APPLICABLE, RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS)

Potential ARARs were identified for each medium of potential concern. The primary ARARs relating to the cleanup action include:

- MTCA, Chapter 70.105D of the Revised Code of Washington (RCW);
- Cleanup Regulations, WAC 173-340;
- Dangerous Waste Regulations, WAC 173-303, and
- State Environmental Policy Act (SEPA) Checklist [RCW 43.21C.030(2)(a) and (2)(b)].

These primary ARARs are anticipated to be the most applicable to the cleanup action because they provide the framework for the cleanup action, including applicable and relevant regulatory guidelines, cleanup standards, waste disposal criteria, references for additional ARARs, and standards for documentation of the cleanup action.

Other applicable ARARs and guidance documents for cleanup of the Site may include:

- Occupational Safety and Health Act, Part 1910 of Title 29 of the Code of Federal Regulations;
- Safety Standards for Construction Work, WAC 296-155;
- Solid Waste Management, Reduction and Recycling, RCW 70.95;
- Minimum Functional Standards for Solid Waste Handling, WAC 173-304;
- Criteria for Municipal Solid Waste Landfills, WAC 173-351;
- Minimum Standards for Construction and Maintenance of Wells, WAC 173-160
- Accreditation of Environmental Laboratories, WAC 173-50; and

6.0 RESTORATION TIMEFRAME

Performance groundwater monitoring will be conducted during the remedial action activity, and groundwater compliance monitoring will be conducted after completion of the performance groundwater monitoring. The estimated timeframe for the petroleum hydrocarbon remedial action for soil is 2 weeks since soil clearance samples will be collected during the remedial action. Groundwater performance and compliance monitoring for petroleum hydrocarbons is for 1 year (4 quarters). It is expected that all of the petroleum hydrocarbon contaminated soil will be removed, and soil confirmation sampling during the excavation activity will confirm removal of all petroleum hydrocarbon contaminated soil.

7.0 PERFORMANCE AND COMPLIANCE MONITORING

Groundwater performance monitoring will be conducted in selected wells after completion of the soil excavation operation. The soil excavation remedial action is estimated to be completed in approximately for 3 weeks, not including site restoration. Samples from the excavation water will be collected either daily or every other day to determine the petroleum hydrocarbon concentrations in the excavation water. The excavation pit water samples are considered performance groundwater sampling. Dewatering of the soil excavation pit will cease after all the petroleum hydrocarbon contaminated soil has been removed from the excavation. Soil confirmation sampling will be conducted within the excavation, from the bottom and sidewall of the entire excavation, and not just the vadose zone soils, following Ecology's Guidance for Remediation of Petroleum Contaminated Sites, which provides guidance for sample locations and the number of confirmation samples. Vadose zone soil samples will be collected in selected areas in the excavation area to determine that petroleum hydrocarbon concentrations have been reduced to concentrations below their cleanup levels.

Groundwater compliance monitoring will be conducted quarterly for 1 year for petroleum hydrocarbons as part of the overall groundwater compliance monitoring program for the BSCSS site. Select wells in the Wexler settlement area will be sampled for HVOC analytes being sampled for the overall BSCSS site.

Potential vapor intrusion, associated with future development, will be mitigated by the installation of vapor barriers and passive venting systems, or other vapor intrusion mitigation methods as a requirement in an environmental covenant. Buildings within the footprint of the HVOC contaminated plume, and buildings within 100 lineal feet from the plume, will require vapor barrier and passive venting.

The cleanup will include a total of two rounds of indoor air sampling. The first round of indoor air sampling will occur post-construction and pre-occupation of the buildings. The sampling procedures, and the analyses for both HVOCs and petroleum COCs, will follow sampling protocol provided in *Ecology's Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action (Review Draft Revised February 2016)* or the current guidance at the time of sampling. If indoor air HVOC and petroleum hydrocarbon COCs concentrations are above their respective screening levels in the first indoor air sampling round, a confirmational sampling round will be conducted within two weeks of the first round, to confirm the findings. If the confirmational sampling confirms the presence of HVOC and/or petroleum COCs in the indoor air, additional indoor air mitigation will be implemented. The details of the indoor air mitigation will be included in a corrective action report. The second round of indoor air compliance sampling will occur prior to the completion of the draft Groundwater Closure Report. The indoor air sampling methodology, indoor air sampling results, and corrective actions for any additional indoor air mitigation (if any) for the first and second rounds of indoor air sampling, will be documented

in the Groundwater Closure Report.

8.0 PROPOSED SCHEDULE FOR SOIL REMOVAL IMPLEMENTATION, EXCAVATION GROUNDWATER PUMPING, AND GROUNDWATER MONITORING

Start soil excavation	2019
Soil Performance Monitoring	During soil excavation
Performance Groundwater Monitoring	During excavation pit water sampling
Install Compliance Monitoring Wells	3 months after soil excavation
Groundwater Compliance Monitoring	One year (4 consecutive quarters)

The following schedule provides more detail for the proposed groundwater performance and compliance monitoring schedules:

Quarterly Compliance Monitoring	4 quarters, complete in 2020
Indoor Air sampling	after buildings constructed and prior to occupancy and prior to draft Groundwater Closure Plan

Compliance wells will be selected based on the horizontal extent of the PCE plume from groundwater sampling results conducted in Spring 2019, to provide compliance groundwater monitoring for the Site, with concurrence from Ecology. It should be noted that the above schedule could change due to shorter or longer remedial action effort to reach cleanup levels. A groundwater compliance sampling contingency, which would extend the groundwater compliance monitoring for one year, will be started at the end of the proposed compliance monitoring in 2020, if COC groundwater cleanup levels have not been reached. After the one additional year, if COC groundwater cleanup levels have not been reached, the Potentially Liable Persons will include a compliance sampling event every five years for periodic review for the duration of the environmental covenant. This shall be documented in the Compliance Monitoring and Contingency Response Plan in the Engineering Design Report.

9.0 INSTITUTIONAL/ENGINEERING CONTROLS

If residual petroleum contamination remains on Wexler after cleanup, or any of the other criteria for triggering an institutional control under WAC 173-340-440 are met, institutional controls may be implemented, which may include an environmental covenant. Vapor intrusion risks will be addressed by the active remediation of contaminated soil and groundwater at the site. Engineering controls, such as vapor barriers, or other vapor intrusion mitigation methods, will be implemented for the new development structures and included in the environmental covenant.

10.0 PUBLIC PARTICIPATION

This criterion considers whether the community has concerns regarding the alternative and, if so, the extent to which the alternative addresses those concerns. This process includes concerns from individuals, community groups, local governments, federal and state agencies, or any other organization that may have an interest in or knowledge of the Site. A Public Participation Plan and Fact Sheet for the 30-day comment period will be prepared for review for the amended consent decree as required under MTCA.

11.0 REFERENCES

Applied Geotechnology, Inc, 1990. *Tank Removal and Hydrocarbon Assessment, Al's Auto Supply, 18129 Bothell Way N.E., Bothell, Washington.* Dated January 25, 1990.

Floyd & Snider, Inc, 2010a, *Phase I Environmental Site Assessment, Schuck's Auto Supply, Bothell, Washington*, Dated June 30, 2010

Floyd & Snider, Inc, 2010, *Phase II Environmental Site Assessment, Shuck's Auto Supply, Bothell, Washington*, Dated September 10, 2010.

HWA GeoSciences, 2008a, *Limited Phase II Environmental Site Assessment, Highway 522 Right-of-Way, 18030 Bothell Way NE, Bothell, WA*. Prepared for City of Bothell, April 15, 2008.

HWA GeoSciences, 2008b, *Phase II Site Assessment, Hertz Rentals Property, Bothell, WA*. Prepared for City of Bothell, October 10, 2008.

HWA GeoSciences, 2012, Remedial Investigation Feasibility Study Final Work Plan, Bothell Former Hertz Facility, Bothell, Washington, prepared for City of Bothell, September 10, 2012.

HWA Geosciences Inc., 2014. *City of Bothell Former Schucks / O'Reilly Soil Cleanup Report, 18125 Bothell Way NE, Bothell, Washington.* Dated August 25, 2014.

HWA, 2015, Remedial Investigation Feasibility Study Work Plan (Rev. 1), Bothell Service Center Site Bothell, Washington, August 10, 2015.

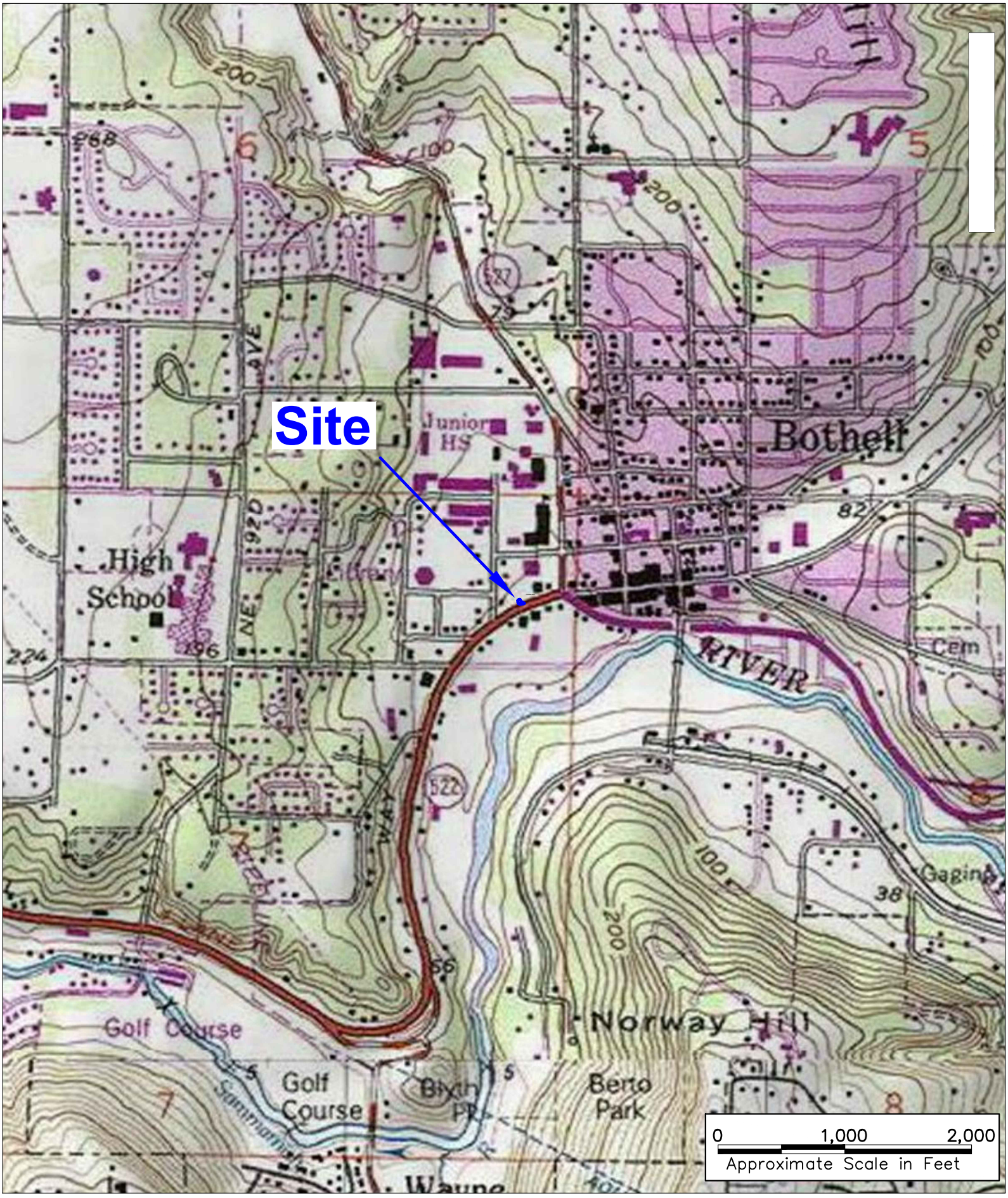
Liesch, B.A., C.E. Price, and K. Walters. 1963. *Geology and Ground-Water Resources of Northwestern King County, Washington.* US Geological Survey.

Shannon & Wilson, *Focused Soil and Groundwater Investigation, Horse Creek Project, Bothell, Washington,* Dated May 7, 2013.

Tuohy & Minor, 1989. *Letter to Bothell Fire Department, Attn: R. Denny Wright, Re: Wexler/Al's Auto Supply, 18127 Bothell Way*. Dated September 20, 1989.

Washington Department of Ecology, 2009, *Guidance for Evaluating Soil Vapor Intrusion in Washington State: Investigation and Remedial Action*, Washington State Department of Ecology, Toxics Cleanup Program, Publication no. 09-09-047, Review DRAFT Revised, February

Figures

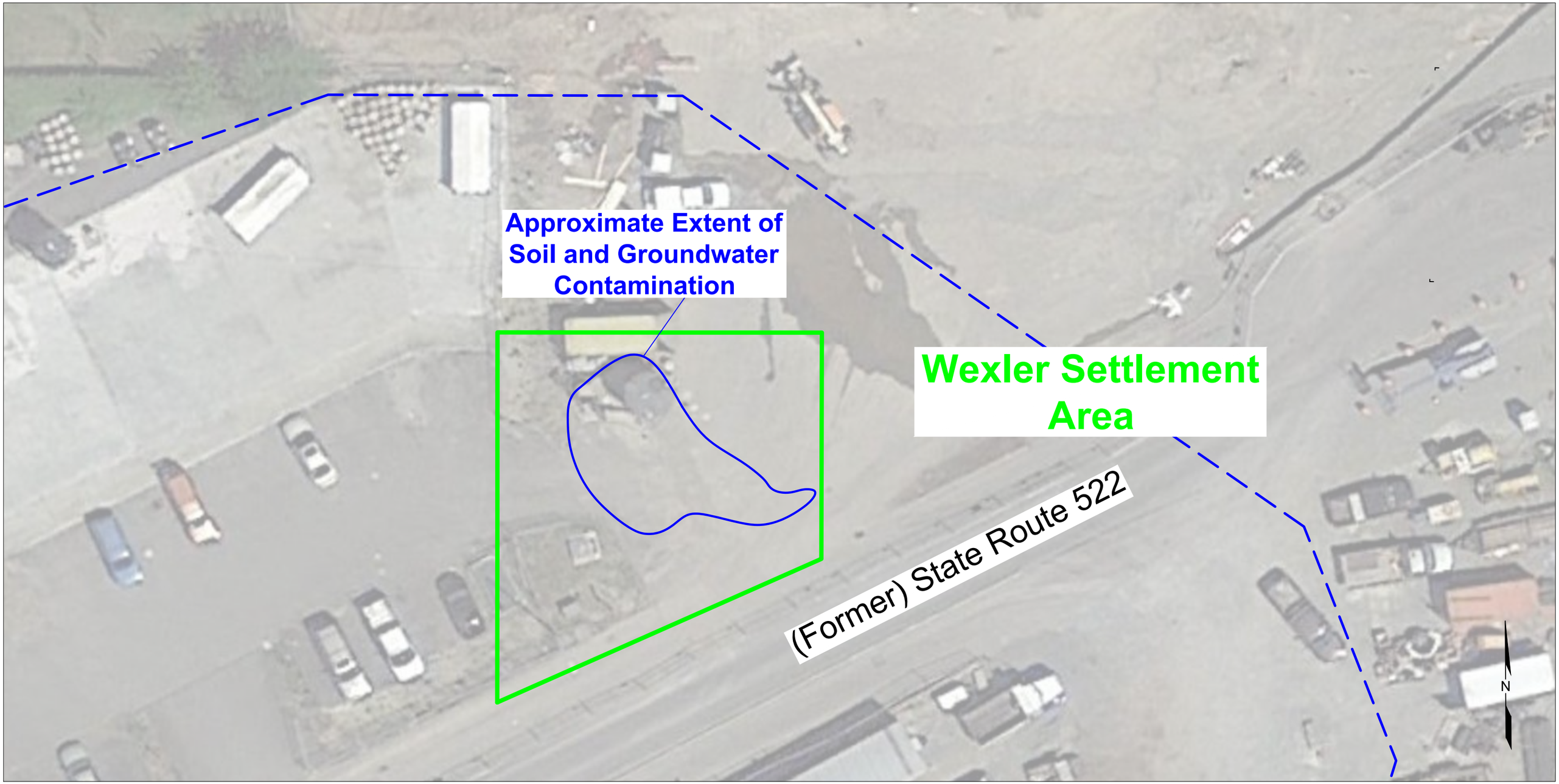


KANE ENVIRONMENTAL INC

Project No. 82305

Cleanup Action Plan
Former Wexler Property Site
Bothell, Washington 98011

Figure 1
Vicinity Map



Aerial Photo Source: Google Earth
Aerial Photo Date: May 22, 2017

LEGEND

Approximate location of Wexler Petroleum Contamination boundary

Approximate location of BSCSS Site Boundary Wexler Settlement Area

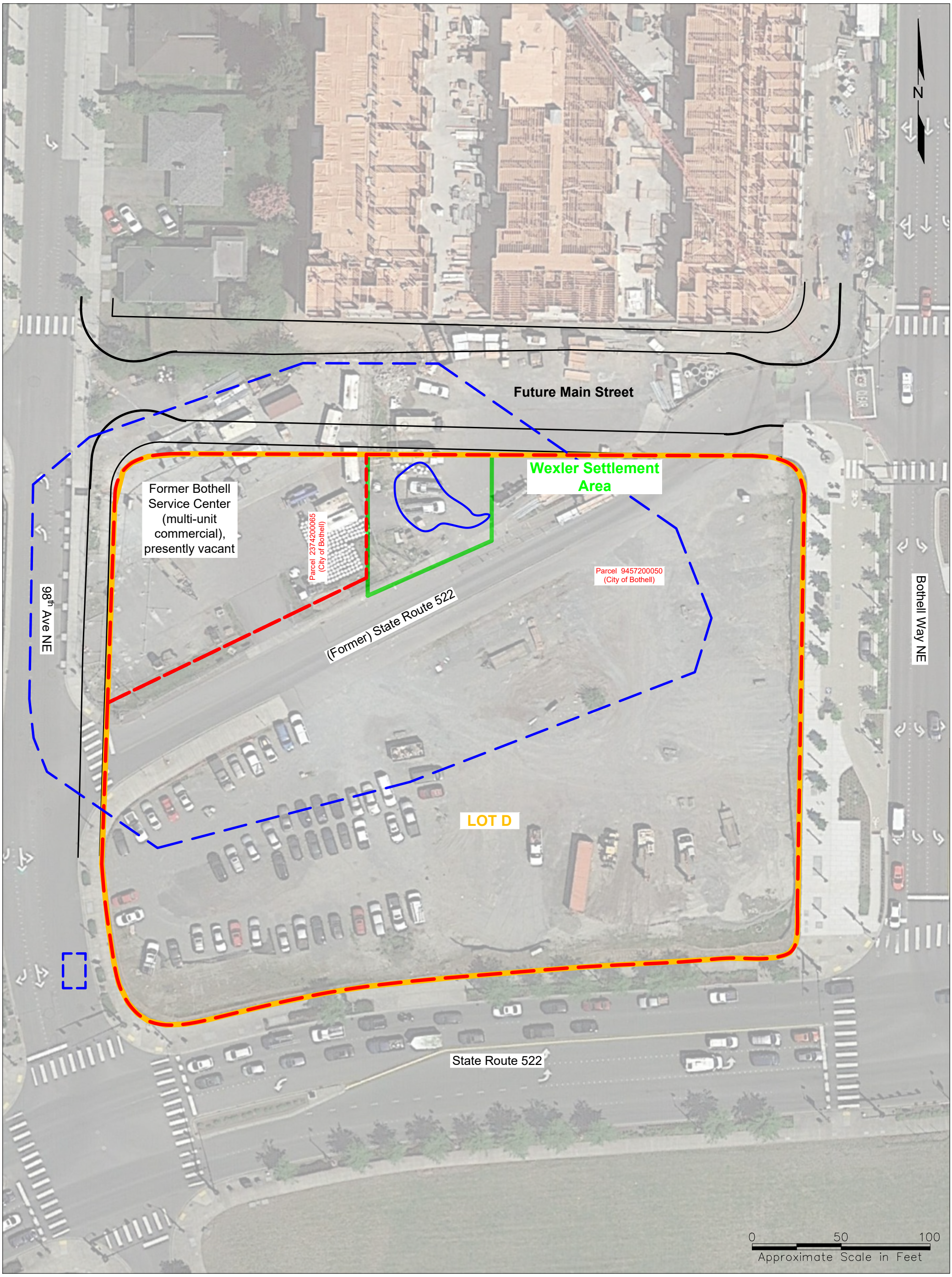
0 20 40
Approximate Scale in Feet

KANE ENVIRONMENTAL INC

Project No. 82305

Cleanup Action Plan
Former Wexler Property Site
Bothell, Washington 98011

Figure 2
Site Plan



Aerial Photo Date: May 2018

LEGEND

- Wexler Settlement Area
- Approximate location of parcel boundary, with label indicating parcel number and ownership
- Approximate location of Wexler Petroleum Contamination boundary
- Approximate location of BSCSS Site boundary
- Approximate location of Lot D
- Approximate location of future Main Street

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Project No. 82305

Cleanup Action Plan
Former Wexler Property Site
Bothell, Washington 98011

Figure 3
Area Site Plan

LEGEND

● - Potential Complete Pathway

Blank - Incomplete Pathway

PRIMARY SOURCE	PRIMARY RELEASE MECHANISM	SECONDARY SOURCE	SECONDARY RELEASE MECHANISM	EXPOSURE PATHWAY	CURRENT RECEPTORS					FUTURE RECEPTORS				
					Utility/Construction Worker	Commercial Worker	Resident/Child	Soil Biota	Plants/Animals	Utility/Construction Worker	Commercial Worker	Resident/Child	Soil Biota	Plants/Animals
Historical Operation of Gas & Service Station	Spills or Leaks From Product Piping, Fuel Dispensers, or Overfill	Soil Contamination		Dermal Absorption / Ingestion	●			●		●	●	●	●	
			Volatilization	Vapor Inhalation	●			●		●	●	●	●	
			Leaching											
Releases of HVOCs at Off-Property Historical Dry Cleaning Facility	Migration of HVOCs Contaminated Groundwater onto the Property	Groundwater Contamination	Volatilization	Vapor Inhalation	●			●		●	●	●	●	
			Advection / Diffusion	Dermal Absorption / Ingestion	●			●		●			●	

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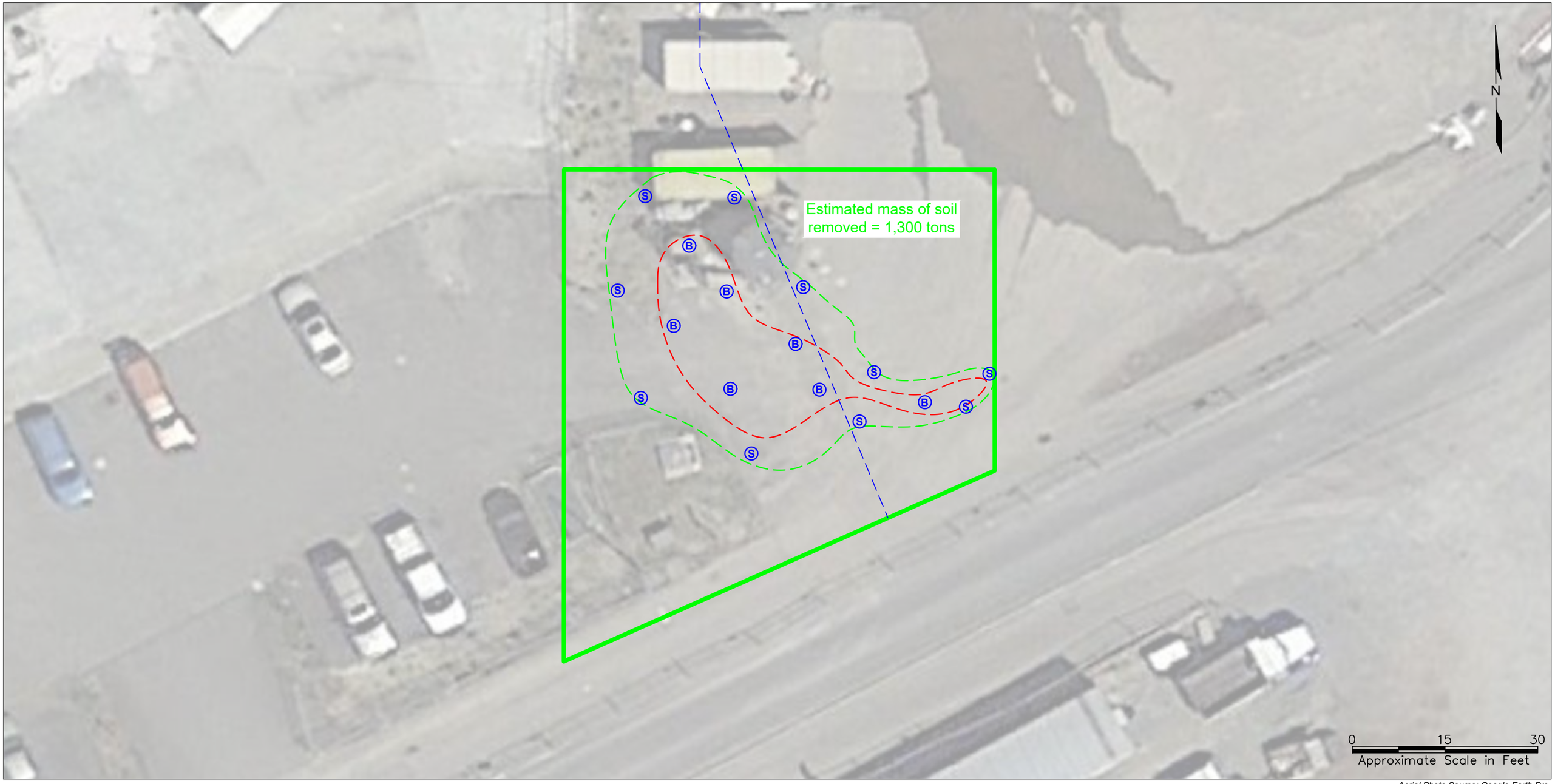
Figure 4
Conceptual Site Model



Aerial Photo Source: Google Earth Pro
Aerial Photo Date: May 22, 2017

LEGEND

- Wexler Settlement Area
- Approximate location of underground fire hydrant water supply line
- Approximate extent of soil containing petroleum contaminants at concentrations exceeding the the MTCA Method A cleanup level
- Approximate extent of proposed soil excavation
- (S) Approximate location of proposed soil confirmation sidewall sample
- (B) Approximate location of proposed soil confirmation bottom sample

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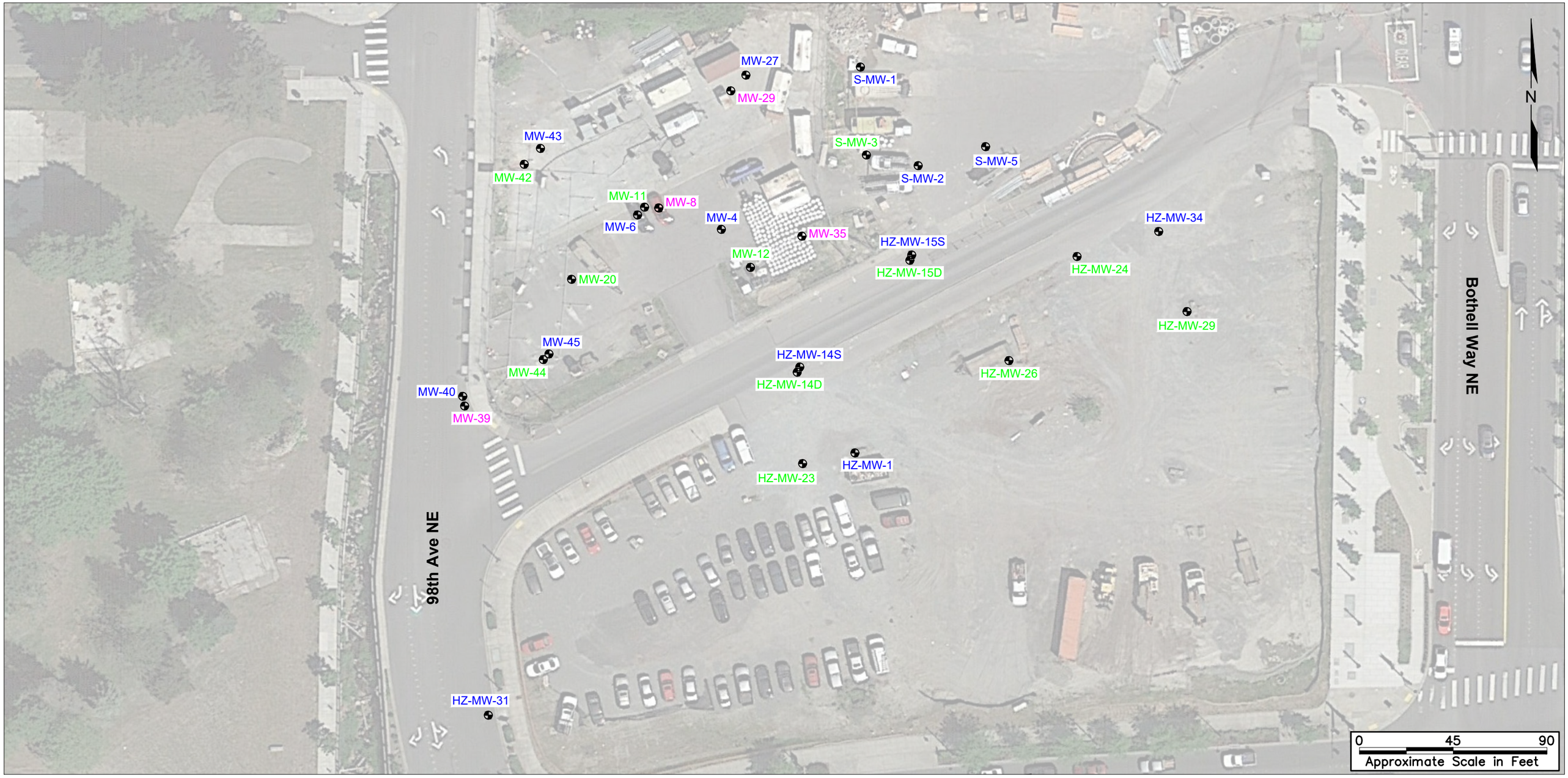
Cleanup Action Plan
Former Wexler Property Site
Bothell, Washington 98011

Figure 5
Preferred Remedial Alternative

ATTACHMENT A

GROUNDWATER PERFORMANCE AND COMPLIANCE MONITORING WELLS



LEGEND

MW-1 — Location of shallow monitoring well (screened 5-25 ft bgs) to be used for groundwater performance and compliance monitoring

MW-2 — Location of intermediate monitoring well (screened 25-35 ft bgs) to be used for groundwater performance and compliance monitoring

MW-3 — Location of deep monitoring well (screened 35-55 ft bgs) to be used for groundwater performance and compliance monitoring

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Project No. 82305

Cleanup Action Plan
Former Wexler Property Site
Bothell, Washington 98011

Attachment A
Groundwater Performance and Compliance Monitoring Wells

Groundwater Performance and Compliance Monitoring Well List*

MW-4
MW-6
MW-8
MW-11
MW-12
MW-20
MW-27
MW-29
MW-35
MW-40
MW-43

S-MW-1
S-MW-2
S-MW-3
S-MW-5

HZ-MW-1
HZ-MW-14D
HZ-MW-15S
HZ-MW-15D
HZ-MW-24
HZ-MW-26
HZ-MW-29
HZ-MW-31
HZ-MW-34

The following wells will be sampled on a limited basis. These wells will be sampled for four (4) consecutive quarters, starting on the Summer 2019 quarterly sampling event, and if 4 consecutive quarters groundwater analytical results are below cleanup levels for PCE, TCE, cis 1,2-DCE and VC, the wells will be decommissioned.

HZ-MW-14S
HZ-MW-23
MW-39
MW-42
MW-44
MW-45

*Selected groundwater monitoring wells may be moved and replaced or decommissioned due to physical obstructions prior to, during and after site development, per review and approval by Ecology as required in the environmental covenant. Selected groundwater monitoring wells may be permanently decommissioned from the quarterly groundwater compliance monitoring list based on attaining MTCA cleanup levels for COCs anytime during groundwater compliance monitoring, per review and approval by Ecology.

ATTACHMENT B

SEPA CHECKLIST

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

***Instructions for applicants*:**

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:
Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals: [help]

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background [help]

1. Name of proposed project, if applicable:

Bothell Service Center Consent Decree Amendment for \Wexler Settlement Area (Former Als Auto Bothell Wexler)

2. Name of applicant: [help]
City of Bothell

3. Address and phone number of applicant and contact person: [help]

Ms. Nduta Mbuthia
City of Bothell
18415 101st Avenue NE
Bothell, WA 98011
425-486-2768

Mr. John Kane
Kane Environmental, Inc.
PO Box 31936
Seattle, WA 98103
206-691-0476

4. Date checklist prepared: [help]

May 1, 2019

5. Agency requesting checklist: [help]

Washington State Department of Ecology

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

Excavation work is currently scheduled to begin in 2019. Remedial action will start after completion of public comment period held by Ecology, and is estimated to continue, including groundwater compliance monitoring as part of the overall BSCSS monitoring program.

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

This proposed work will require compliance groundwater monitoring. This SEPA Checklist is for the MTCA remedial actions for the Wexler Settlement Area.
Upon completion of major remediation activities, the land will be sold by the City of Bothell for redevelopment.

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

A report detailing the environmental conditions at the site and the proposed cleanup action, titled *DRAFT Remedial Investigation / Feasibility Study / Cleanup Action Plan*, dated May 2019 and the Draft Cleanup Action Plan were prepared by Kane Environmental, Inc. The reports include past and current site characterization data including soil and groundwater testing through 2019, and details for the Preferred Alternative for remedial action at the site.

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. [help]

No.

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

Water Discharge Permit – The existing water discharge permit for King County Department of Industrial Waste will utilized (since the petroleum is commingled with HVOCs) to place

groundwater pumped from the soil excavation pit into the sanitary sewer. The pit water will be treated prior to discharge into the sanitary sewer through activated carbon canisters prior to discharge. A construction surface water general permit is not required since the work site is less than an acre and there is no direct discharge to a stream.
Soil Disposal – If found to be commingled (TPH & HVOC), the excavated soil may require disposal under a Contained-In designation from the Washington State Department of Ecology for transport and disposal of the soils as non-hazardous waste in a Subtitle D landfill. If the soils are found to have TPH impact only, they will not be characterized as contained in. Although not likely to be found, soil exceeding 19 parts per million (ppm) will be managed as hazardous waste and will be manifested and transported to an appropriate disposal facility.
Grading Permit – If necessary, a grading permit will be obtained from the City of Bothell for soil excavation.

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.) [help]

This proposed amendment to the Bothell Service Center Simon & Son (BSCSS) consent decree incorporates a project that will remediate soil and groundwater contaminated with petroleum hydrocarbons from a former gasoline service station (Wexler) that resulted in commingling of the HVOC plume from BSCSS. The Wexler Settlement Area has a commingled groundwater plume from the western adjacent Bothell Service Center Simon & Sons Site (BSCSS) that has halogenated volatile organic compounds (HVOCs) traced to a release or releases of dry cleaning solvents from a former dry cleaning operation on the BSCSS property. The Wexler Settlement Area cleanup will consist of excavation and off-site disposal of petroleum-contaminated soil and pumping groundwater from the excavation into a 7,000-gallon temporary poly tank. The water in the tank will be treated through activated carbon canisters prior to permitted discharge into the sanitary sewer. Soil will be transported by truck to a licensed landfill. The excavation will be restored with clean fill material (gravel borrow mind from a quarry). Prior to filling the excavation, approximately 1,000-gallons of the bioremediation product, Carbstrate, will be placed in the excavation to enhance the remedial action of the HVOCs found in groundwater from the commingled plume on the Wexler Settlement Area site.

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. [help]

This project site is located within the BSCSS site, in a portion of parcel number 945720-0050 Bothell, Washington.

Figure Attached:

Site Plan

B. ENVIRONMENTAL ELEMENTS [help]

1. Earth [help]

a. General description of the site: [help]

The vacant site is upland from the Sammamish River and is currently covered in asphalt and concrete The former State Route 522 runs east-west through the southern portion of the site.

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other:
The site is level in the northern portion with an approximate 3% grade to the south toward the Sammamish River.

b. What is the steepest slope on the site (approximate percent slope)? [help]
There are no significant slopes on the site, nothing greater than 3% slope towards the river.

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 agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. [help]
Silt, sandy silt with mixed gravels (alluvium) with dense glacial till at approximately 55 feet below ground surface

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. [help]
There are no surface indications or history of mass wasting or landslides (unstable soils) on the site or in the vicinity of the site.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill. [help]
Petroleum contaminated soil excavation and excavation pit water pumping are proposed for this project, where petroleum hydrocarbon soil concentrations exceeding the Washington State Department of Ecology Model Toxics Cleanup cleanup levels will be removed. Approximatley 1,200 tons of soil will be removed from an approximate 1,000 square foot area and 2,000 gallons of groundwater will be pumpted from the excavation pit. Clean fill (gravel borrow) will be placed in the excavation and restored to current at-grade condtions.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. [help]
The proposed excavation area is surrounded by asphalt and concrete. As a preventative measure, a silt fence will be placed downslope from the excavation area and all on-site storm drains will be covered with filter fabric.

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

Approximately 90% of the site is currently covered by asphalt and concrete, with the last 10% covered with gravel.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: [help]
BMPs for erosion control and stormwater protection will be implemented for any soil excavation activity on the site, such as covering soil stockpiles with plastic and installing storm catch basin socks

2. Air [help]

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known. [help]
Equipment and vehicle emissions and potential for generation of dust during excavation activities are expected during the remedial action activity. A limited number of equipment will include diesel powered drill rigs and excavators. The equipment will emit carbon dioxide, carbons monoxide and diesel emissions. Dust will be mitigated with a water truck during the removal of surficial concrete and asphalt if the weather is warm and dry. Other vehicles and cars will be used by workers for travel to and from the site.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. [help]
None. There are no regional air quality limitations in this area.

c. Proposed measures to reduce or control emissions or other impacts to air, if any: [help]
Management practices that will be used to reduce or eliminate dust include covering soil stockpiles with plastic and the use of a water truck during dry weather conditions. All vehicles will have weekly maintenance to ensure optimum operating conditions.

3. **Water** [help]

a. Surface Water:

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. [help]
The Sammamish River is located approximately 800 feet to the south of the site. Horse Creek is located to the west of the site and flows in a southerly direction to the Sammamish River. Furthermore, the segment of Horse Creek near the site is isolated by a membrane. Groundwater flows away from Horse Creek in a southeasterly direction. No other surface water features are on or in the vicinity of the site.

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. [help]

Horse Creek is located to the west of the site across 98th Ave NE within 800 feet of the site. However, none of the remedial action activity will impact the creek since it is all occurring more than 500 feet to the east of 98th Ave NE.

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. [help]

None.

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

No.

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

No. King County iMap http://gismaps.kingcounty.gov/iMap/?mapset=hazards

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. [help]

No. Onsite catch basins will be protected with installed socks to prevent turbid stormwater from entering the stormwater system while excavation and drilling activities are taking place. No catch basins will be blocked and all will be protected with socks.

b. Ground Water:

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. [help]

No groundwater will be withdrawn from a well for drinking water. Groundwater monitoring wells will be installed for compliance groundwater monitoring associated with the cleanup as part of the overall BSCSS monitoring program, in addition to the ones already in place at the site, and groundwater will be periodically sampled for chemical analysis only. Groundwater will also be withdrawn within the excavation pit, treated through activated carbon prior to permitted discharge. Withdrawal of groundwater is for the groundwater compliance sampling and remedial action only.

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. [help]

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. [help]

Water collecting from a rain event within the excavations, including stormwater, will be collected and stored onsite in a temporary holding tank, then tested prior to offsite disposal or permitted disposal to sanitary sewer. This water will not be released to groundwater or surface waters. All other runoff water will be unaffected by the remedial action.

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

Waste materials could enter the stormwater catch basins, but all catch basins will have socks installed to remove any waste materials from entering the stormwater system.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe. [help]

No.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any: [help]

Excavations will be dewatered as necessary. Refer to 3 c 1 Water Runoff, above.

4. **Plants** [help]

a. Check the types of vegetation found on the site: [help]

____deciduous tree: alder, maple, aspen, other
____evergreen tree: fir, cedar, pine, other
shrubs
grass
____pasture
____crop or grain
____orchards, vineyards or other permanent crops.
____wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
____water plants: water lily, eelgrass, milfoil, other
____other types of vegetation

None. The site is unvegetated.

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

The site is unvegetated.

c. List threatened and endangered species known to be on or near the site. [help]

None. There are no threatened or endangered plants on the site.

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

None. There will be no land disturbance associated with this remedial action other than targeted soil excavation, drilling vertical borings for the installation of groundwater monitoring wells.

e. List all noxious weeds and invasive species known to be on or near the site. [help]

None.

5. **Animals** [help]

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. [help]

Examples include:

birds: **hawk,** heron, eagle, **songbirds**, other: Pigeons and Crows
mammals: deer, bear, elk, beaver, other:
fish: bass, salmon, trout, herring, shellfish, other Chinook Salmon, Coho Salmon, Sockeye Salmon, Steelhead, cutthroat trout and rainbow trout have been observed at the Horse Creek confluence with the Sammamish River.

b. List any threatened and endangered species known to be on or near the site. [help]

Chinook Salmon migrate up and down the Sammamish River.

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

No. The site is entirely covered in concrete and asphalt and no known bird or other species migration routes are present at the site. The remedial action will not impact migration routes.

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

None.

e. List any invasive animal species known to be on or near the site. [help]

None.

6. **Energy and Natural Resources** [help]

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. [help]

None.

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

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: [help]

None.

7. **Environmental Health** [help]

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. [help]

This project involves construction related to soil excavation, and removal for offsite disposal, of soil containing petroleum hydrocarbons, with concentrations of HVOCs in the soil and groundwater due to the commingled PCE plume from the BSCSS site. There are potential risks to workers from petroleum hydrocarbons and PCE and its breakdown products TCE, cis-1,2 DCE and Vinyl Chloride vapors during site remedial action activities that will be addressed in the Health & Safety Plan for the remedial action. There are no other toxic chemicals that will be used at the site. Health & Safety protocols will be strictly enforced to be sure there are no adverse impacts to human health and the environment. A Surface Water Pollution Prevention Plan (SWPPP) and an Erosion Control Plan will be completed prior to starting any remedial action at the site.

1) Describe any known or possible contamination at the site from present or past uses. [help]

For this remedial action, the primary contamination at the site is a result of a release of petroleum hydrocarbons from a former gasoline service station along with commingled PCE and daughter products are located in subsurface soil and groundwater from the BSCSS site.

The extent of the petroleum hydrocarbon contamination is presented in the draft Remedial Investigation/Feasibility Study report for the Wexler Settlement Area site.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity. [help]

3)

There is a gas meter at the northwest corner of the former BSCSS building, but the natural gas service was disconnected in the Summer 2016 prior to the BSCSS building demolition. There is a gas line in 98th Ave NE, but it is located toward the center of the street and will not be impacted by remedial action activities. There is also a gas line along Bothell Way NE, but it will not be impacted by the remedial action. A public and private underground locate will be conducted for any work conducted on the Wexler Settlement Area.

4) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project. [help]

Some limited equipment including excavators and related support vehicles may need intermittent refueling during remedial action activities, but toxic or hazardous chemicals, and fuel, will not be stored at the site.

5) Describe special emergency services that might be required. [help]

None anticipated. Standard emergency services such as 9-1-1.

6) Proposed measures to reduce or control environmental health hazards, if any: [help]

Appropriate personal protective equipment (PPE) and practices laid out in a Health & Safety Plan (HASP) will be used during site activities and established site access control.

b. Noise [help]

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

Traffic noise from Bothell Way NE and 98th Ave NE, but we expect this to be minimal. Ambient noise from excavators, drill rigs and support vehicles will be generated during approved work hours during the remedial action. The short-term construction noise will adhere to City of Bothell noise regulations. There are no long-term noise issues related to the remedial action.

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. [help]

Traffic and excavation equipment operation will cause noise during normal work hours (7 am through 6 pm). No other excessive or ongoing noise associated with the project is anticipated.

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

Work will be conducted during normal business hours.

8. **Land and Shoreline Use** [help]

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. [help]

The site is vacant. No structures are located on the site. Adjacent properties include additional commercial uses and residences to the north of the site. The project will not affect current land use at the site, or on nearby or adjacent properties.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use? [help]

No agricultural uses, site is not known to have ever been used for agricultural purposes.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how: [help]

No.

c. Describe any structures on the site. [help]

The site is vacant.

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

No. There are no structures on the Wexler Settlement Area property.

e. What is the current zoning classification of the site? [help]
The site is zoned Commercial by the City of Bothell. Reference: King County Parcel Viewer

f. What is the current comprehensive plan designation of the site? [help]
DC – Downtown Core Reference: City of Bothell Comp Plan 2015

g. If applicable, what is the current shoreline master program designation of the site? [help]
Not applicable, because the property is not within the shoreline designation. Reference: King County iMap

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.[help]
No. Reference: King County iMap

i. Approximately how many people would reside or work in the completed project? [help]
No change, the site is vacant.

j. Approximately how many people would the completed project displace? [help]
None. No change.

k. Proposed measures to avoid or reduce displacement impacts, if any: [help]
Not applicable, no one is being displaced.

L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: [help]
None. Project will not change property configuration.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any: [help]
Not applicable, no agricultural or forest land on or adjacent to the site.

9. **Housing** [help]

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. [help]
None. This is not a housing project.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. [help]
Not applicable, this is not a housing project.

c. Proposed measures to reduce or control housing impacts, if any: [help]
Not applicable, this is not a housing project.

10. **Aesthetics** [help]

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? [help]
No buildings are to be demolished, constructed, or modified, as part of this project.

b. What views in the immediate vicinity would be altered or obstructed? [help]
None.

b. Proposed measures to reduce or control aesthetic impacts, if any: [help]
Not applicable, no change.

11. **Light and Glare** [help]

a. What type of light or glare will the proposal produce? What time of day would it mainly occur? [help]
None. Work during daylight hours, no sources of light or glare.

b. Could light or glare from the finished project be a safety hazard or interfere with views? [help]
No.

c. What existing off-site sources of light or glare may affect your proposal? [help]
None.

d. Proposed measures to reduce or control light and glare impacts, if any: [help]
None. Work to be completed during daylight hours.

12. **Recreation** [help]

a. What designated and informal recreational opportunities are in the immediate vicinity? [help]
The site is vacant.

b. Would the proposed project displace any existing recreational uses? If so, describe. [help]
No.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: [help]
None.

13. **Historic and cultural preservation** [help]

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers ? If so, specifically describe. [help]
The site is vacant.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. [help]
None known.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. [help]
None.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required. [help]

None. If resources are discovered, appropriate agencies will be contacted.

14. **Transportation** [help]

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any. [help]

Access to the site will be from the former/vacated State Route 522/ Transit access road that runs east-west through the site, with access to the site through security fences. A traffic control plan will be submitted to the City of Bothell detailing traffic and pedestrian control measures to be implemented as needed during the duration of the project.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop? [help]

The site is accessed by King County Metro Transit bus route, which travels on 98th Ave NE and Bothell Way NE.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? [help]

This proposed project will not affect the number of parking spaces.

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private). [help]

No.

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

None.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates? [help]

The number of vehicular trips per day will not be affected by the completed project, since the site is vacant.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe. [help]

No.

i. Proposed measures to reduce or control transportation impacts, if any: [help]

None.

15. **Public Services** [help]

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe. [help]
No.

b. Proposed measures to reduce or control direct impacts on public services, if any. [help]
None.

16. **Utilities** [help]

a. Circle utilities currently available at the site: [help] None
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

c. 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. [help]
None.

C. Signature [help]

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: 

Name of signee: John Kane

Position and Agency/Organization: President, Kane Environmental, Inc.

Date Submitted: May 1, 2019

D. supplemental sheet for nonproject actions [help]

(**IT IS NOT NECESSARY** to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Proposed measures to avoid or reduce such increases are:

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

3. How would the proposal be likely to deplete energy or natural resources?

Proposed measures to protect or conserve energy and natural resources are:

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Proposed measures to protect such resources or to avoid or reduce impacts are:

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Proposed measures to avoid or reduce shoreline and land use impacts are:

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Proposed measures to reduce or respond to such demand(s) are:

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.