

APPENDIX 6 – HAZARDOUS MATERIALS UPDATES

April 14, 2021

To: Robert Woeck, WSDOT I-405/SR 167 Megaprogram Deputy Program Administrator

From: Anne Conrad, WSDOT Northwest Region Hazardous Materials & Solid Waste Management Lead, and WSDOT I-405/SR 167 Megaprogram environmental team

Subject: Update to I-405, SR 522 Vicinity to SR 527 Express Toll Lanes Improvement Project (MP 21.79 to 27.06) Environmental Assessment, Appendix G, *Hazardous Materials Analysis Technical Memorandum* and Appendix G1, *Hazardous Materials Analysis Addendum*

INTRODUCTION

The Washington State Department of Transportation (WSDOT) has prepared this update to the I-405, SR 522 Vicinity to SR 527 Express Toll Lanes Improvement Project (MP 21.79 to 27.06) Environmental Assessment Appendix G, *Hazardous Materials Analysis Technical Memorandum* dated October 2019 (Appendix G) and Appendix G1, *Hazardous Materials Analysis Addendum* dated February 2020 (Appendix G1). This update provides new and/or clarifying information on the site risk analyses and status of implementing recommendations for several sites of concern since Appendices G and G1 were prepared. This update also summarizes WSDOT's next steps for implementing the remaining recommendations.

This document should be used with Appendices G and G1 as follows:

- The text in Sections 2.0 and 3.0 of this addendum supplements the text in Section 3.7 of Appendices G and G1 for sites 4, 6, 7, 8, 9 and 13.
- Replace Table 7 of Appendices G and G1 with Table 7 in this update. Changes to the previous version of Table 7 are indicated with underlining and strikethrough formatting.

UPDATES TO RISK ANALYSES

Based on the updated risk analyses for the 18 potential sites of concern, 11 sites now have a low anticipated level of impact to the Project, as described below. Of these 11 low impact sites, two have the potential to become a moderate impact risk. The remaining 7 sites have a moderate anticipated level of impact to the Project, and two have the potential to become a high impact risk.

Site ID 6 King County Parks/Former BNSF Rail Line, King County Parcel Number 0926059170

This site is located within the Project limits, at the southeast corner of the I-405/SR 522 interchange. This parcel is the former BNSF railroad right of way, at the location of a proposed new bridge for the northbound off-ramp. The Project proposes to obtain an airspace easement for the new bridges and off-ramp, which is considered a partial property acquisition. The Project also proposes a temporary construction easement (TCE) for the site. Rail lines have historically been known to have petroleum, creosote, and heavy metals contamination. Although the rail tracks have been removed, there may still be residual contamination present. This site was previously considered a **Moderate** impact risk to the Project based on the description of potential construction activities at the site. The site is now considered a **Low** impact risk to the Project because construction activities are limited to potentially using the area for staging.

Site ID 7 WSDOT NE Woodinville Drive UST, NE Woodinville Drive and NB I-405, SE Corner, Bothell, FSID# 23108

This site is located within the Project limits at the southeast corner of the I-405/SR 522 interchange. A heating oil underground storage tank (UST) was discovered during the I-405, Bellevue to Lynnwood Improvement Project, when a drainage system was installed in 2015. The UST had leaked into the soil, and the TPH-D-contaminated soil was excavated and removed off-site. Groundwater was apparently not impacted. Following cleanup activities, the site received an NFA determination from Ecology in 2017.

The presence of a historical LUST that has been addressed to Ecology's satisfaction is a Historical Recognized Environmental Condition (HREC). The site was previously considered to be a **Moderate** impact risk to the Project because of its location, and residual TPH-D-impacted soil might be present and potentially impact the Project; if encountered, remediation would be straightforward. The site is now considered a **Low** impact risk to the Project because additional review of available documents indicated residual TPH-D-impacted soil had been over-excavated and removed.

FOLLOW-UP ON IMPLEMENTATION OF RECOMMENDATIONS

Site ID 4 Former Excell Cleaners/Shurgard/Canyon Park, Self-Storage Limited Partnership, 1715 228th Street SE, Bothell (Inactive drycleaner list)

This site is located adjacent to the Project limits, on the south side of the Project limits, and hydrologically cross-gradient. A dry cleaner operated on the site from 1994 to 1996. It is currently used as a storage facility. There is no evidence of releases to soil or groundwater, but no site investigations have been conducted. The history and file review of this site is described in more detail in Appendices G and G1.

Proposed Project activities include use of the site as a TCE. The following activities would occur in the WSDOT right of way adjacent to the site: excavation for a detention pond and stormwater treatment, construction of a stormwater outfall, a stream realignment, pavement resurfacing, addition of new pavement, construction of a retaining wall, and correcting a fish barrier.

A limited Phase II Environmental Site Assessment (ESA) was conducted in March 2021. Based on the findings of the investigation, there was no indication of a widespread release of volatile organic compounds (VOCs) to soil or groundwater. However, the groundwater results indicate impacts associated with total and dissolved arsenic, total lead, total chromium, total petroleum hydrocarbons as diesel (TPH-D), and total petroleum hydrocarbons as heavy oil (TPH-O).

The limited Phase II ESA did not alter the conclusion that the site is considered to be a **Moderate** impact risk to the Project. WSDOT will include a copy of the Phase II study with the design-build RFP and will develop General Special Provisions (GSPs) and Special Provisions (SPs) to limit dewatering and require assessment of any generated fluids prior to disposal.

Site ID 8 Chevron 93299, 15900 116th Ave NE, Bothell, FSID# 94213842

This site is located adjacent to the Project right of way, and east of the Project limits, within 500 feet of the I-405 pavement, and hydrologically upgradient. The history and file review of this site is described in more detail in Appendices G and G1.

Proposed Project activities closest to the site are excavations for a noise wall. The presence of shallow impacted groundwater that could potentially migrate off site and impact the Project is a REC. A limited Phase II Environmental Site Assessment (ESA) was conducted in November 2020. No evidence of contamination from the service station was discovered in a groundwater sample collected from a monitoring well located approximately 300 feet hydrologically down-gradient to cross-gradient from the site. However, the Project's proposed noise wall at this location extends approximately 300 feet closer to the Chevron site than the monitoring well that was sampled. It is unknown if impacts to groundwater from the Chevron site might reach to the northern end of the proposed noise wall.

The limited Phase II ESA did not alter the conclusion that the site is considered to be a **Moderate** impact risk to the Project. WSDOT will include a copy of the Phase II study with the design-build RFP and will develop General Special Provisions (GSPs) and Special Provisions (SPs) to limit dewatering and require assessment of any generated fluids prior to disposal.

Site ID 9 Juno Therapeutics (former Sonus Pharmaceuticals), 1522 217th Place SE, Bothell, FSID# 28356548

This site is located within the Project limits on the northwest side of SR 527. WSDOT proposes a partial acquisition of the tax parcel the Ecology site is located on along SR 527, where proposed improvements include additional pavement, pavement resurfacing, and a retaining wall. The history and file review of this site is described in more detail in Appendices G and G1. Based on the results of a hydrogeologic investigation, Ecology provided a No Further Action determination for this site in 2006.

As described in Appendices G and G1, the presence of historical impacted groundwater that has been addressed to Ecology's satisfaction is a historical REC (HREC). There is no change to the conclusion that the site is considered to be a **Low** impact risk to the Project, with the possibility of becoming a **Moderate** impact risk if Project activities on the site require dewatering.

A follow-up conversation with Ecology in July 2020 clarified that because WSDOT's proposed acquisition area is outside Ecology's site boundary on the tax parcel, and the site received a No

Further Action determination by Ecology, no further site investigation is recommended at this time. WSDOT has updated the recommendations in Table 7 to reflect the completion of this coordination with Ecology.

Site ID 13 Bothell City Shop/Public Works UST 2391 and City of Bothell King County parcel 0926059013, 17555 120th Avenue NE/17555 Brickyard Road NE, Bothell, FSID# 21681545

WSDOT proposes a partial acquisition and a temporary construction easement at the Bothell City Shop parcel (King County parcel 0926059001) and a full acquisition of the City of Bothell parcel (King County Parcel 0926059013).

In May 2020, WSDOT completed a limited Phase II ESA for Site ID 13. The investigation found oil-range total petroleum hydrocarbons (TPH-O) is present in soil above the MTCA Method A Cleanup Levels on the City of Bothell parcel 0926059013. The testing location is within the proposed acquisition footprint and is where street sweepings were historically dumped. Low concentrations of TPH-O are present in soil north and east of the building on the Bothell City Shop parcel, outside the current proposed partial acquisition footprint. These detections are likely the result of releases from historic operations at the site. Low concentrations of total petroleum hydrocarbons as diesel (TPH-D) are present in soil to the northeast of the building on the site, outside the current proposed partial acquisition footprint. These detections are likely the result of releases from the former underground storage tanks at the site that were not fully removed during the cleanup action in 1993. There were no detections for chemicals of concern in the groundwater samples.

The Phase II investigation did not alter the conclusion that the site is considered to be a **Moderate** impact risk to the Project because of the property acquisition and historical activities leading to possible releases of petroleum products, metals, and solvents. WSDOT will include a copy of the Phase II study with the design-build RFP and will develop General Special Provisions (GSPs) and Special Provisions (SPs) to require development of a Hazardous Materials Management Plan to address known and unknown contamination in the work area.

NEXT STEPS AND CONCLUSION

This update is intended to provide supplemental information to Appendices G and G1 for hazardous materials sites of concern. For the remaining sites of concern, WSDOT plans to implement the recommendations detailed in Table 7 of this update. Note that this update also includes minor changes to the wording of the recommendations for Site IDs 1, 4, 5, 6, 7, 8, 9, 10, 13, and 16 to clarify details, such as who is performing the recommendation and timing for completion.

Table 7. Recognized Environmental Conditions Summary Table

Site ID	Site (Facility Site ID)	Acquisition (A) or TCE	Site Address and Distance from Project	Groundwater Flow Direction	Planned/ Proposed Construction Activities	Databases	Contaminants of Concern	Impacted Media	Description	Likely Risk to Construction or WSDOT's Liability	Recommendations
1	AT&T Wireless NR5 Bothell 920307 (aka Cingular Wireless) (3706871)/AT&T Mobility Phase I Main Building (98437662)	TCE	20307 North Creek Parkway Bothell Adjoining to east	Southeast and southwest	Excavation adjacent to the site for retaining wall along NB I-405 and a fish barrier correction/ stream channel creation at Stream 25.0L. A TCE will be needed for clearing existing vegetation on the north bank of the wetland and replanting with native vegetation	ALLSITES, CSCSL, UST, VCP	TPH-D, TPH-O	Soil Groundwater	In 2008, ~10,000 gallons of diesel fuel were released from an AST into a storm drain and soil. Emergency response actions contained the spill within the property boundaries. In 2013 a remediation system to recover oil from groundwater was installed. Groundwater monitoring in 2017 indicated impacted groundwater is not leaving site. Status is cleanup started.	Moderate. High impact risk if contaminated groundwater plume migrates off-site to Project limits.	<u>WSDOT will include RFP language stating that if</u> excavation for the retaining wall extends into the shallow groundwater, <u>the contractor shall conduct</u> sampling and pre-characterizing the groundwater for disposal purposes is recommended.
2	Dry Clean US (5125580)	No	22833 Bothell Everett Highway Bothell 900 feet to south	North-northeast	Stream alignment, stormwater treatment	ALLSITES, CSCSL, ECHO, FINDS, HSL, VCP	PCE, HVOCs	Soil Groundwater Air	A dry cleaner operated on site beginning in 1992. Environmental assessments were conducted beginning in 2005. PCE present in soil and groundwater. Impacted soil removed in 2007 and 2009. Subsequent sampling of groundwater, soil gas, and indoor air found PCE and HVOCs above CULs. Soil vapor extraction system (SVE) pilot studies and air sparge study conducted in 2016. No additional work was completed, and current status is cleanup started. Groundwater was found between 3 to 8 feet bgs, but down-gradient monitoring well did not contain PCE above CULs in 2017. Status is cleanup started.	Moderate. High impact risk if contaminated groundwater plume migrates off-site to Project limits.	No action. The site is 900 feet away from planned construction activities.
3	Canyon Park Cleaners (77714595)	No	22615 Bothell Everett Highway Bothell Adjoining to south	Estimated to south	Excavation for detention pond, pavement resurfacing, additional pavement, retaining wall, fish barrier correction	ALLSITES, ECHO, FINDS, Historic cleaner, Inactive drycleaner, RCRA NonGen	Potential HVOCs	Unknown	Dry cleaners from 1987 to 2001. No known environmental releases; no investigations conducted.	Moderate	No action. The site is more than 500 feet away from planned intrusive work. Large scale dewatering not expected.

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4	Former Excell Cleaners/Shurgard / Canyon Park, Self-Storage Limited Partnership	TCE	1715 228th Street SE Bothell Adjoining to west	Estimated to north toward North Fork Perry Creek	TCE, Excavation for detention pond, stormwater treatment, stormwater outfall, stream alignment, pavement resurfacing, additional pavement, retaining wall, fish barrier correction	Historic cleaner	Potential HVOCs	Unknown	Dry cleaners from 1994 to 1996. No known environmental releases; no investigations conducted. (Snohomish County parcel 270530000401600)	Moderate	WSDOT would will develop language as part of TCE acquisition to limit liability. Conduct WSDOT conducted a Limited Phase II ESA in March 2021. WSDOT will develop GSPs and SPs to limit dewatering and require assessment of any generated fluids prior to disposal.
5	Jacksons 615/Shell 120935 (53947398)	No	22802 Bothell Everett Highway Bothell 650 feet to southwest	Northeast	Stormwater treatment	ALLSITES, CSCSL, ECHO, FINDS, ICR, LUST, Manifest, RCRA-NonGen, UST, VCP	TPH-G, Benzene	Soil Groundwater	A LUST with releases to soil and groundwater was reported to Ecology in 1990. Petroleum-impacted soil was excavated and disposed of off-site in 1991. Approximately 15,000 gallons of groundwater was removed, treated, and disposed of. A soil vapor extraction (SVE) and groundwater treatment system was installed and operated from 1993 through 2001. The site entered the VCP in 2009. Status is cleanup started.	Moderate	No action. The site is 650 feet away from planned construction activities.
6	King County Parks/Former BNSF Rail Line	Air Space TCE	King County Parcel # 0926059170 Project	Estimated north to Sammamish River	Permanent easement (Air Space only), TCE, construct new bridge for NB off-ramp		TPH, Creosote, Metals	Suspected in soil	Based on history of rail lines, any work in and around rail lines can encounter contamination.	Moderate Low	As part of obtaining the air space lease and TCE, WSDOT would will develop language to limit liability. WSDOT will develop GSPs and SPs to address the risk of encountering contamination in the work area. As part of developing the RFP, WSDOT will specify in the contract that the contractor must sample and pre-characterize soil to determine baseline conditions if the contractor proposes construction activities that would require any excavation on the site.

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7	WSDOT NE Woodinville Dr UST (23108)	Existing WSDOT ROW	NE Woodinville Drive and NB I-405, SE Corner Bothell Project	Estimated north to Sammamish River	Retaining wall, additional pavement, construct new bridge for NB off ramps	ALLSITES, CSCSL NFA	TPH-D	Soil	A heating oil UST was discovered during the I-405 Express Lanes Project when a drainage system was installed in 2015. The UST had leaked into the soil, and the petroleum contaminated soil was excavated and removed off-site. The site received an NFA in 2017.	Moderate <u>Low</u>	<u>WSDOT will d</u> Develop GSPs and SPs to address risk of encountering contamination in work area during construction.
8	Chevron 93299 (94213842)	No	15900 116th Ave NE Bothell Adjoining to east of ROW and a proposed noise wall	West	Pavement resurfacing, noise wall, retaining wall	ALLSITES, CSCSL, ECHO, Financial Assurance, FINDS, HSL, ICR, LUST, Manifest, RCRA-LQG, UST	TPH-G, Benzene	Soil Groundwater	Gasoline service station in operation since 1987. In 1993, an LUST was reported. TPH-G and benzene found in soil and groundwater above CULs in 1995. Depth to groundwater is approximately 12 feet bgs. Status is awaiting cleanup.	Moderate	<u>WSDOT Conducted a limited Phase II ESA to determine soil and groundwater quality at the location of the proposed noise wall adjoining the site in November 2020.</u> <u>WSDOT will d</u> Develop GSPs and SPs to limit dewatering and require assessment of any generated fluids prior to disposal.
9	Juno Therapeutics (former Sonus Pharmaceuticals Bothell) (28356548)	A	1522 217th Place SE Bothell Project	East	Partial acquisition, pavement resurfacing, signage	ALLSITES, CSCSL NFA, Manifest, RCRA NonGen, VCP	Metals (arsenic and manganese)	Groundwater	Metals (arsenic and manganese) in groundwater confirmed above MTCA CULs. Groundwater present between 0.35 and 4.18 feet bgs. The site received an NFA from Ecology in 2006, as the metals exceedances appeared to be naturally occurring. (Snohomish County parcel 27053000104100)	Low. Moderate impact risk if Project activities on the site require dewatering.	<u>WSDOT contacted Ecology and confirmed that the proposed acquisition is outside the Site boundary. No additional investigation is required. Contact Ecology for a written opinion on the NFA and associated conclusions related to arsenic as it pertains to the property acquisition and construction activities (dewatering and discharge). WSDOT will develop language as part of the property acquisition to limit liability.</u> <u>WSDOT will d</u> Develop GSPs and SPs to limit intrusive work to limit dewatering and require assessment of any generated fluids prior to disposal.

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10	Texaco Star Mart/Jacksons 616/Texaco #632321469/Shell 120531 (63265631)	No	11700 NE 160th Street Bothell Adjoining to east of ROW, 400 feet from I-405	Variable, but likely to southwest	Pavement resurfacing	ALLSITES, CSCSL, ECHO, FINDS, Historic Auto, ICR, LUST, Manifest, RCRA-NonGen, UST, VCP	TPH-G, TPH-D, BTEXN	Soil Groundwater	Site has been a gas service station since 1972. Leaks and spills from the USTs and pipes were reported to Ecology in 1991. In 1991, 1,740 cy of contaminated soil was excavated and removed. Contaminated soil remained, and groundwater was impacted. Additional investigations were conducted between 1992 and 2019. Groundwater depth varied between 9.95 to 39.8 feet bgs, with variable flow direction. Groundwater may migrate to stormwater drainage swale, which is connected to a culvert which flows to the I-405 ROW to a bioswale. Site status is cleanup started.	Low. Moderate impact risk if Project activities include excavation to groundwater level.	WSDOT will develop GSPs and SPs to limit dewatering and require assessment of any generated fluids prior to disposal.
11	Autosmith/Bothell North/One Hour Electric (91249646)	No	2326 228th Street SE Bothell ~400 feet to northeast	Estimated north to Perry Creek	Pavement resurfacing and additional pavement	ALLSITES, Historic auto, Historic cleaner, UST	Potential HVOCs, TPH-D	Unknown	UST removed in 1978. Transmission repair shop from 2007 to 2009. Drycleaning from 2006 to 2011. No records of releases to soil or groundwater.	Low	No action. The site is 400 feet away from planned construction activities.
12	Bang Property (59898498)	No	12631 & 12633 NE Woodinville Drive, Woodinville 0.31 miles to south	Northeasterly to Sammamish River	None	ALLSITES, CSCSL, FINDS, HSL	TPH-G, TPH-D, BTEXN	Soil Groundwater	In 2001, petroleum contaminated soil was found in the ROW of NE Woodinville Drive. Two LUSTs from a former gasoline service station were removed in 2015 to minimize migration onto the down-gradient Ferndale Grain site. Contaminated soil was excavated and removed and biological treatment slurry was placed in the excavation. Confirmation samples indicated TPH and BTEXN still present in sidewalls. Groundwater was not tested, and is suspected of contamination. Status is cleanup started.	Low	No action. The site is more than 0.25 mile from planned construction activities.

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13	Bothell City Shop/Public Works UST 2391 (21681545) and City of Bothell King County parcel 0926059013	A	17555 120th Ave NE/17555 Brickyard Road NE, Bothell Project	Estimated north to Sammamish River	Partial acquisition, retaining wall, additional pavement, construct new bridge for NB off ramps, demolish a building Full Acquisition	ALLSITES, CSCSL NFA, ECHO, FINDS, ICR, LUST, RCRA-NonGen, UST	TPH-G, TPH-D, Benzene, Metals, Solvents	Soil	One diesel UST and one gasoline UST, installed in 1977, were removed from the site in July 1993 due to failing a tightness test. Leaking petroleum products contaminated the soil, and Ecology received notification of a LUST in 1993. Approximately 130 cubic yards of petroleum contaminated soil was removed in August 1993. Groundwater was reported as not affected. The site was cleaned up and received an NFA in 2012. If residual contamination is present, cleanup will be straightforward. (King County parcel 0926059001) King County parcel 0926059013: Adjoining parcel to Bothell City Shop parcel. Operational activities from Bothell City Shop may have occurred on this parcel.	Moderate	WSDOT conducted Conduct a Phase II ESA to determine soil and groundwater quality at the site <u>in May 2020</u> . As part of property acquisition, WSDOT will <u>will</u> develop language for acquisition limiting liability. <u>WSDOT will develop</u> GSPs and SPs to address risk of encountering contamination in work area. Building assessments for asbestos and lead based paint is required as part of WSDOT's ROW acquisition process.
14	Ferndale Grain Woodinville (32147851)	No	12800 NE Woodinville Drive Woodinville 0.25 miles to southeast	Northeasterly to Sammamish River	Stormwater treatment	ALLSITES, CSCSL	TPH-O, TPH-G, TPH-D, Benzene, Xylenes	Soil Groundwater	The site was historically operated as a feed mill, until 1997. Subsurface soil and groundwater investigations in 1994 and 1995 were followed by installation of in-situ remediation system in 1996 which has been continuously operating. An upgradient off-site source from LUSTS at a former gasoline station (Bang Property, currently Twisted Cafe) has continued to impact the site. Ferndale removed the LUSTs from the off-site source in 2015 and has conducted quarterly groundwater monitoring. Status is cleanup started.	Low	No action. The site is 0.25 mile from planned construction activities.
15	Securite Gun Club/Dirt Lorde Property (11796)	No	12024 Woodinville Drive Bothell 150 feet to south	North and west to Sammamish River	Stormwater treatment, stream alignment north of Sammamish River	ALLSITES, CSCSL NFA, NPDES	TPH-D, TPH-O	Soil Groundwater	Releases of heating oil to soil and groundwater were found in 2016. Remediation conducted in 2017 removed impacted soil and groundwater. Three monitoring wells were installed in 2017 and groundwater was measured between 9.67 and 18.23 feet bgs in perched groundwater lenses. Following remediation, soil and groundwater concentrations of TPH-D and TPH-O were below applicable MTCA CULs. The site received an NFA in 2017.	Low	No action. The site is 150 feet from planned construction activities.

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16	Siemens Transmission/ Cepheid Bothell (3322)/Terminix Branch 2141 (11122292)	A	22121 17th Ave SE Bothell Project	Estimated south to Queensborough Creek	Partial acquisition, additional pavement	ALLSITES, ASBESTOS, ECHO, FINDS, Historic auto, Manifest, NPDES, RCRA-NonGen	Potential TPH, solvents, pesticides	Unknown	Two buildings were constructed in 1985 with several commercial businesses in operation. Siemens transmission repair shop operated from 2001 to 2004. Terminix, a pest control company, operated from at least 2000 to 2002. Cepheid, a molecular diagnostics company, was located at the same address. There has been no indication of releases of hazardous materials to soil or groundwater. ACM removed during remodeling of one of the buildings in 2017. (Snohomish County parcel 27053000403900)	Low	As part of property acquisition, WSDOT would will develop language for acquisition limiting liability.
17	Snohomish County Fire Station 45 (97654)	No	1608 217th Place SE Bothell Adjacent	Estimated west toward North Creek	Additional pavement/ sidewalk	ALLSITES, UST	Potential TPH	Unknown	Two USTs removed in 1996. No releases reported.	Low	No action. The site is 150 feet from planned construction activities.
18	Tan & Yang Property (8389076)	No	727 228th Street SE Bothell 0.28 mile to west	Estimated to east and northeast to Perry Creek	None	ALLSITES, CSCSL	TPH	Soil Groundwater	Private residence. TPH was confirmed in soil and suspected in groundwater in 2006. Status is awaiting cleanup.	Low	No action. The site is located more than 0.25 mile from planned construction activities.

ACM = asbestos-containing material; AST = aboveground storage tank; bgs = below ground surface; BTEXN = benzene, toluene, ethylbenzene, and total xylenes; CUL = cleanup levels; GSP= General Special Provision; HVOCs = halogenated volatile organic compounds; LUST = leaking underground storage tank; MTCA = Model Toxics Control Act; NFA = no further action; PCE = tetrachloroethene; ROW = right of way; SP=Special Provision; SVE = soil vapor extraction; TPH-D = total petroleum hydrocarbons as diesel; TPH-G = total petroleum hydrocarbons as gasoline; TPH-O = total petroleum hydrocarbons as heavy oil; UST = underground storage tank; VCP = voluntary cleanup program