

Technical Memorandum

TO: Andy Kallus, Washington State Department of Ecology
FROM: Dylan Frazer, LG and Larry Beard, PE, LHG
DATE: July 20, 2022
RE: **Interim Action Work Plan Addendum No. 1
Construction Phase 2—Low-Permeability Cap Expansion
Kimberly-Clark Worldwide Site Upland Area
Everett, Washington
Landau Project No. 0121049.080.081**

Introduction

On behalf of the Port of Everett (Port), this Interim Action Work Plan Addendum No. 1 (IAWP Addendum) presents plans for an additional phase of the 3rd Interim Cleanup Action (Interim Action) at the Upland Area of the former Kimberly-Clark Worldwide, Inc. (K-C) Model Toxics Control Act (MTCA) site (Site). The Site is located adjacent to and just north of the Port’s primary Marine Terminal facilities in Everett, Washington, and the Interim Action is being conducted in coordination with the Port’s Maritime Industrial Expansion (MIE) at Norton Terminal project (collectively referred to in this document as the Project), as illustrated on Figures 1 and 2. The Interim Action documented to-date includes a Preload Phase and a Primary Construction Phase; these phases are presented in the K-C Site Interim Action Work Plan (IAWP; Landau Associates, Inc. [Landau] 2021a). This IAWP Addendum describes plans for a second construction phase (Construction Phase 2), which consists of construction of additional low-permeability cap at the Site. Consistent with the two Interim Action phases underway, Construction Phase 2 will be constructed under the Agreed Order (AO) between the Port, K-C, and the Washington State Department of Ecology (Ecology; AO No. DE 9476), which addresses a 3rd Interim Cleanup Action to be completed at the Site by the Port (Ecology 2021).

Construction Phase 2 Scope

The IAWP identified that approximately 30 acres of the 46-acre upland area would be paved as part of the primary phase (i.e., Phase 1) of the interim action. This area is identified in blue shading on Figure 2. Construction Phase 2 of the Interim Action consists of additional low-permeable cap (i.e., paving) in approximately 4 acres of the northern portion of the K-C Site. This area is located within the maximum capping area as identified in the AO, and generally includes the northern 230 ft of the Site (identified as the “future PUD substation” and “future maritime tenant” areas in the project plans attached to the IAWP). All work will be conducted consistent with the IAWP, which includes general and project-specific engineering requirements, compliance monitoring, temporary erosion and sediment control (TESC) plans, stormwater pollution prevention plan (SWPPP), and cultural resources requirements.

Approximately 4 acres of low-permeable cap will be constructed under this phase of the Interim Action. The extent of the additional cap is illustrated in yellow on Figure 2. Construction of this cap will include multiple aspects of the Interim Action as identified in the IAWP: site grading, utility installation, cap construction, and soil and groundwater management. Similar to the permitting approach in the 3rd Interim Action, the activities in this expanded area are typically exempt from requiring further authorization by state or local governments through permit or approval actions. However, the action must still comply with the substantive requirements of such permits or approvals. The Port will work with the agencies with jurisdiction to clearly identify elements of work under this IAWP Addendum and other work elements that may not be part of the Interim Action. The Port will undertake any necessary permit modifications, as required, and obtain a letter of substantive requirements from the City of Everett regarding the project elements included in this IAWP Addendum.

Site Grading

The Construction Phase 2 area will receive clean import fill and will be graded to direct stormwater drainage and support construction of the low-permeability cap. Import, grading, and compaction of clean import fill will be conducted in accordance with the requirements described in Section 4.4 of the IAWP. A portion of the Construction Phase 2 area (the “future maritime tenant” area) is already planned to be a graded, temporary gravel surface. Grading within the Construction Phase 2 area not included in previous phases of the Interim Action (the “future PUD substation” area) will also be graded with clean import fill in coordination with the adjacent portions of the Site. Grading and compaction of clean fill will direct stormwater drainage to conveyance and treatment infrastructure under construction during the Primary Construction Phase, thus further reducing infiltration. Clean fill will also be compacted to meet subgrade design requirements for the low-permeability cap.

Utility Installation

Consistent with the Primary Construction Phase of the Interim Action, subsurface utilities and any above-grade utilities requiring subsurface foundations will be installed during Construction Phase 2 to support stormwater treatment and conveyance and minimize future disturbance of the cap. Utilities to be installed include a storm drainage system, which will convey stormwater to stormwater treatment systems currently under construction. Underground utilities that will be constructed within the Construction Phase 2 areas include fresh water, sanitary sewer, power, and communication.

Cap Construction

A low-permeability cap will be constructed in the Construction Phase 2 area to further reduce surface water infiltration and prevent exposure of terrestrial ecological receptors. This cap will consist of hot mix asphalt (HMA) pavement and will be designed to further exceed the 30 percent infiltration reduction performance goal of the Interim Action.

Soil and Groundwater Management

Consistent with the Interim Action phases underway, contaminated soil and groundwater in the Construction Phase 2 area will be managed in accordance with the K-C Site Soil and Groundwater Management Plan (Landau 2021b).

Interim Action Performance Goal

Implementation of Construction Phase 2 will increase the area of low-permeable cap at the Site and further exceed the 30 percent infiltration reduction minimum performance goal of the Interim Action. Approximately 30 acres of the Upland Area (or approximately 65 percent) is being paved as a part of the Primary Phase Interim Action (i.e., Phase 1), thus already exceeding the minimum performance goal for the Interim Action. The Construction Phase 2 will add approximately 4 acres of asphalt pavement cap at the Site, which will increase the total paved area to more than 33 acres (or approximately 72 percent of the Site).

Schedule and Reporting

Consistent with the Port's goal to clean up the Upland Area through the scope of the 3rd Interim Action and put it back into economic use as quickly as possible, the Construction Phase 2 will be implemented concurrently with phases of the Interim Action already underway, or after if necessary based on contracting constraints. The results of this additional phase will be documented in the Interim Action summary report following completion of the Interim Action.

Use of This Technical Memorandum

This technical memorandum has been prepared for the exclusive use of KPFF Consulting Engineers and the Port for specific application to the MIE Project at Norton Terminal. No other party, other than relevant regulatory agencies, is entitled to rely on the information, conclusions, and recommendations included in this document without the express written consent of Landau. Further, the reuse of information, conclusions, and recommendations provided herein for extensions of the project or for any other project, without review and authorization by Landau, shall be at the user's sole risk. Landau warrants that within the limitations of scope, schedule, and budget, our services have been provided in a manner consistent with that level of care and skill ordinarily exercised by members of the profession currently practicing in the same locality under similar conditions as this project.

Landau makes no other warranty, either express or implied. Re-assessment of permit/compliance needs may be needed based on results of pre-application comments from the agencies and/or changes to the Project as described above.

This document has been prepared under the supervision and direction of the following key staff.

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Attachments

Figure 1. Vicinity Map

Figure 2. Third Interim Action Site Diagram

References

Ecology. 2021. Second Amendment to Agreed Order No. DE 9476 In the Matter of Remedial Action by Kimberly-Clark Worldwide, Inc and the Port of Everett. Washington State Department of Ecology. May 18.

Landau. 2021a. Final Interim Action Work Plan, Kimberly-Clark Worldwide Site Upland Area, 3rd Interim Action, Port of Everett, Everett, Washington. Landau Associates, Inc. August 5.

Landau. 2021b. Final Soil and Groundwater Management Plan, Maritime Industrial Expansion at Norton Terminal, Port of Everett, Everett, Washington. Landau Associates, Inc. June 22.

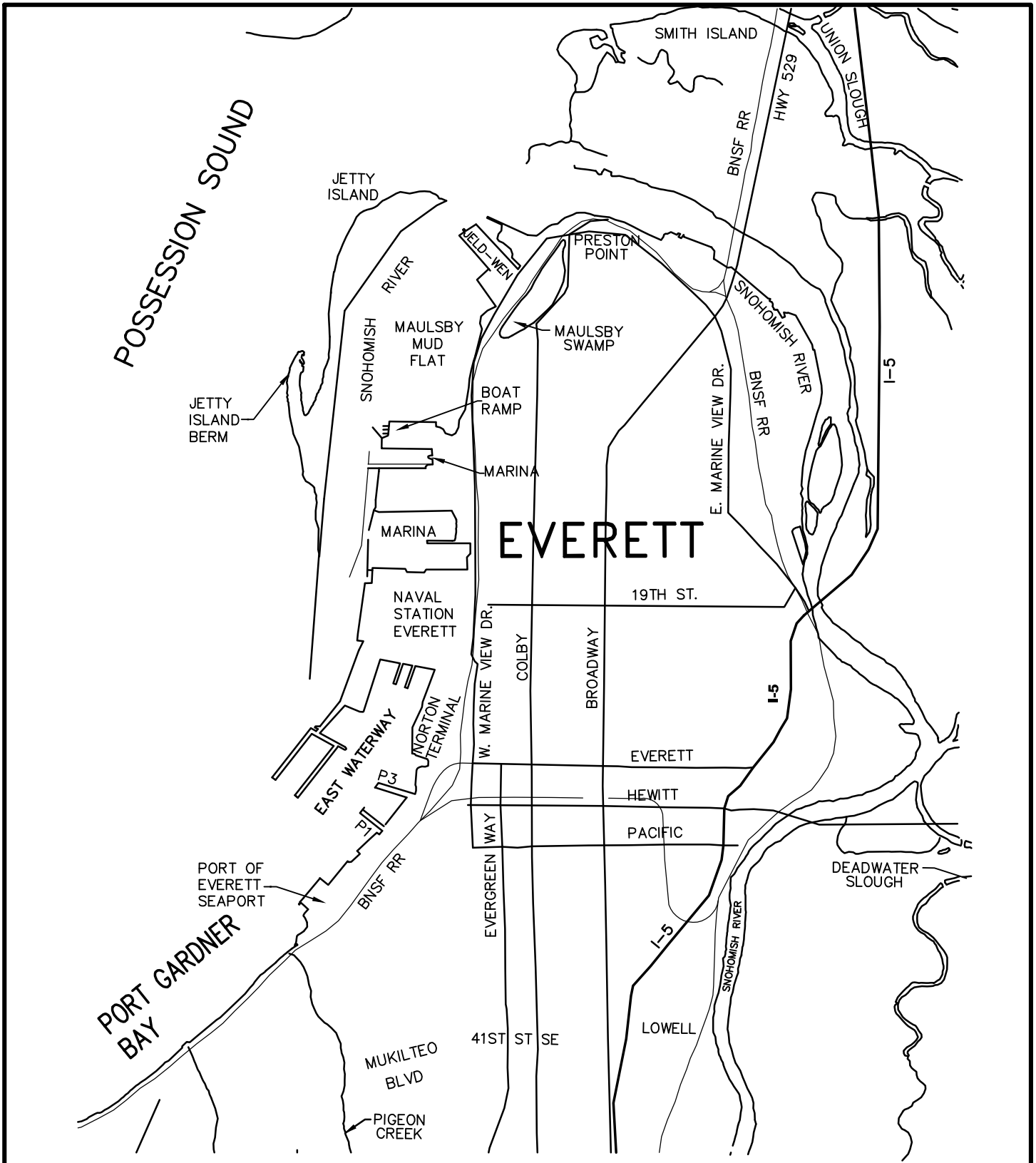
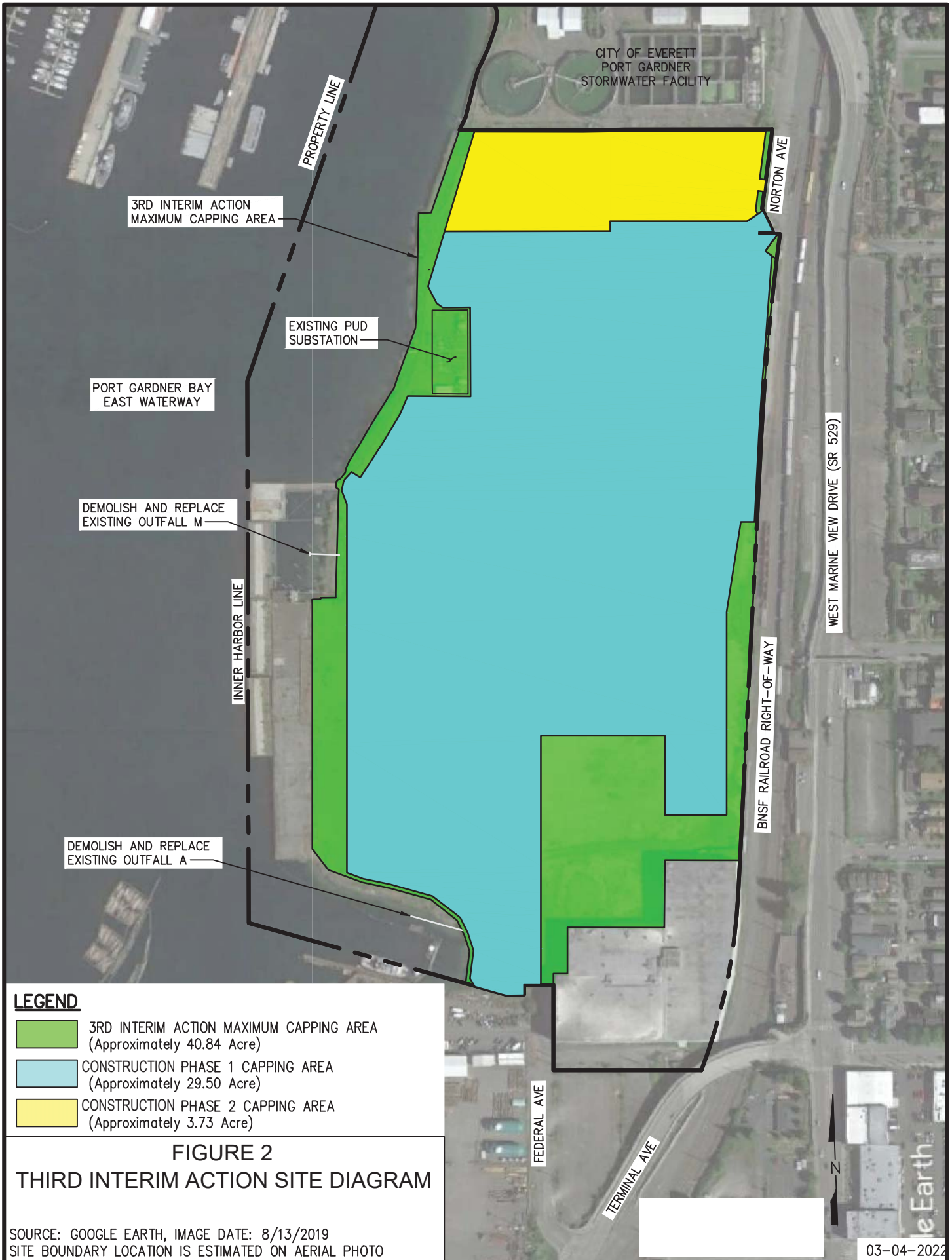


FIGURE 1
VICINITY MAP
 SCALE: NTS



3RD INTERIM ACTION
MAXIMUM CAPPING AREA

EXISTING PUD
SUBSTATION

PORT GARDNER BAY
EAST WATERWAY

DEMOLISH AND REPLACE
EXISTING OUTFALL M

DEMOLISH AND REPLACE
EXISTING OUTFALL A

CITY OF EVERETT
PORT GARDNER
STORMWATER FACILITY

PROPERTY LINE

NORTON AVE

WEST MARINE VIEW DRIVE (SR 529)

INNER HARBOR LINE

BNSF RAILROAD RIGHT-OF-WAY

FEDERAL AVE

TERMINAL AVE



LEGEND

- 3RD INTERIM ACTION MAXIMUM CAPPING AREA
(Approximately 40.84 Acre)
- CONSTRUCTION PHASE 1 CAPPING AREA
(Approximately 29.50 Acre)
- CONSTRUCTION PHASE 2 CAPPING AREA
(Approximately 3.73 Acre)

FIGURE 2
THIRD INTERIM ACTION SITE DIAGRAM

SOURCE: GOOGLE EARTH, IMAGE DATE: 8/13/2019
SITE BOUNDARY LOCATION IS ESTIMATED ON AERIAL PHOTO