STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300

STATE ENVIRONMENTAL POLICY ACT
DETERMINATION OF NONSIGNIFICANCE

Date of Issuance: June 1, 2023

Lead agency: Department of Ecology, Toxics Cleanup Program, Southwest Region

Agency Contact: Andrew Smith, Cleanup Project Manager, andrew.smith@ecy.wa.gov; 360-407-6316

Permit Number: Work is to be performed under the authority of a Model Toxics Control Act Agreed Order No. DE 11099 and First Amendment

Description of proposal:

Phase 1: USG proposes to treat vadose and saturated soils within the Core Remediation Area, where all soils that exceed a concentration of 250 mg/kg arsenic will be treated; the treatment methodology will also treat significant quantities of soil with lesser arsenic concentrations. The method of treatment is called in-situ solidification and stabilization (ISS). Based on the results of treatability studies, the recommended ISS mix is Portland Cement at a dosage rate of 13 percent by weight, bentonite at a dosage of 1 percent by weight, and ferrous sulfate heptahydrate at a mass ratio of about 20:1 to the arsenic concentration, equivalent to a mass ratio of 4:1 iron to arsenic. Excess soil is anticipated, some of which may be used to increase the site grade slightly; excess soil will be disposed of at an appropriate offsite facility (e.g., Subtitle D landfill). The site surface will be re-paved similar to preconstruction conditions.

Phase 2: WSDOT will also be conducting remedial actions on the property south and adjacent to the Core Remediation Area, referred to as the P429 Plus property. WSDOT will be conducting excavation and offsite disposal of all soils containing arsenic at concentrations greater than 20 mg/kg. WSDOT will then be rerouting the Hylebos Creek through this property and develop the area on either side of the new creek bed as a riparian zone.

Phase 3: In addition to the excavation of the P429 Plus property, WSDOT will excavate and remove arsenic-contaminated sediment from the existing Hylebos Creek channel. The existing

Hylebos Creek channel where this remediation occurs will serve only as an overflow ditch for an upstream wetland after this remediation occurs.

Location of proposal: The work will be employed at 7110 Pacific Highway East and 7100 Pacific Highway East, Fife, WA.

Applicant/Proponent: USG Corporation (USG)

Project Representative: Preston D. Wilson
E-MAIL: pdwilson@usg.com
PHONE: 312-436-6461
ADDRESS: 550 West Adams Street, Chicago, Illinois 60661-3676

Ecology has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). We have reviewed the attached Environmental Checklist, as well as the Revised draft Cleanup Action Plan. These documents are available at:

Pierce County Library, 1000 Laurel St, Milton, WA 98354

Ecology Lacey Office (by appointment), 300 Desmond Drive SE, Lacey, WA 98503

This determination is based on the following findings and conclusions:

- The project will bind concentrations of arsenic in the soil and reduce concentrations of these contaminants in the groundwater in the Core Remediation Area.
- The project will remove concentrations of arsenic lead to levels below the unrestricted cleanup level on the P429 Plus property.
- Arsenic contaminated soil will be disposed of at an appropriate landfill.
- An Operations Maintenance and Monitoring Plan will be prepared for the project.
- Groundwater monitoring and contingency plans will evaluate effectiveness of the remedy and provide contingencies if groundwater conditions do not change as anticipated.
- The Ecology cleanup project manager will provide oversight during project implementation.

The comment period for this DNS corresponds with the comment period for the Public Review Revised Draft Cleanup Action Plan and associated Agreed Order First Amendment. The comment period begins on June 15, 2023, and ends on July 17, 2023

Responsible official:

Rebecca S. Lawson, P.E., LHG
Section Manager
Toxics Cleanup Program
Southwest Region
Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7600
360-407-6241

Signature 

Date 5/31/2023

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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

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 Find help answering background questions

1. Name of proposed project, if applicable:

USG Interiors Highway 99 Site Cleanup Action

2. Name of applicant:

USG Corporation (USG)

3. Address and phone number of applicant and contact person:

USG Corporation
550 West Adams Street
Chicago, Illinois 60661-3676
Attn: Preston Wilson (312) 436-6461

4. Date checklist prepared:

February 24, 2023

5. Agency requesting checklist:

Washington State Department of Ecology

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

Tasks For Phase 1	Schedule to Submit to Ecology
Submit a Draft Engineering Design Report (EDR) for the Core Remediation Area.	120 days after agreed order amendment effective date
Submit the final EDR for the Core Remediation Area	30 days after receipt and incorporation of Ecology comments on the draft EDR.
Submit Draft construction plans and specifications for the Core Remediation Area	120 days after submittal of the final EDR for the Core Remediation Area
Submit Final construction plans and specifications for the Core Remediation Area	30 days after receipt and incorporation of Ecology comments on the draft construction plans and specifications
Begin Contractor Procurement for In situ Solidification Stabilization (ISS) treatment in the Core Remediation Area	45 days after receiving Ecology approval of final construction plans and specifications for the Core Remediation Area
Begin cleanup action in the Core Remediation Area	90 days after procuring contractor
Complete cleanup action in the Core Remediation Area	120 days after starting cleanup action

Submit Construction Completion Report and Operations Maintenance and Monitoring Plan (OMMP) for Core Remediation Area	90 days after completion of cleanup action
Tasks Phase 2	
Submit Draft construction plans and specifications for the P429 Plus Area and Hylebos Sediment Excavation Area	270 days after agreed order amendment effective date
Submit Final construction plans and specifications for the P429 Plus Area and Hylebos Sediment Excavation Area	60 days after receipt and incorporation of Ecology comments on the draft construction plans and specifications
Submit Draft Compliance Monitoring Plan	330 days after agreed order amendment effective date
Submit Final Compliance Monitoring Plan	60 days after receipt and incorporation of Ecology comments on the draft Compliance Monitoring Plan
Submit Draft Disposal and/or Treatment Plan	330 days after agreed order amendment effective date
Submit Final Disposal and/or Treatment Plan	60 days after receipt and incorporation of Ecology comments on the draft Disposal and/or Treatment Plan
Begin Cleanup Action for the P429 Plus Area and Hylebos Sediment Excavation Area	Summer 2024 or Summer 2025.
Submit Construction Completion Report for the P429 Plus Area and Hylebos Sediment Excavation Area	120 days following completion of cleanup action
Submit recorded environmental restrictive covenants.	1 year after completion of cleanup actions for Phase 1 and 2
Submit Combined Construction Completion Report for Phase 1 and 2 and revised OMMP	90 days following submittal of Phase 2 Construction Completion Report
Groundwater Trend Analysis Report	5 years after completion of cleanup action for Phase 1

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

If necessary, further groundwater treatment may be implemented using in situ methods.

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

a) *Revised Cleanup Action Plan, USG Interiors Highway 99 Site, Milton, Washington.* Issued for Public Review by the Washington State Department of Ecology. February 3, 2023.

b) Innovex Environmental Management, Inc. 2021. *SR 167/I-5 to SR 509 – New Expressway. USG Highway 99 Site, Hylebos Creek Contaminated Sediment Removal and Parcel P429 Plus Soil Excavation, Interim Action Work Plan*. September 15, 2021.
c) CDM Smith. 2012. *Remedial Investigation Report, USG Interiors Highway 99 Site, Milton, Washington.* June 23, 2016.
d) CDM Smith. 2013. *Feasibility Study, USG Interiors Highway 99 Site, Milton, Washington.* June 23, 2016.
e) CDM Smith. 2020. *Field Pilot Study Evaluation Report, USG Interiors Highway 99 Site, 7110 Pacific Highway East, Milton WA 98354*. June 12, 2020.
f) CDM Smith. 2020. *Conceptual Design Report, USG Interiors Highway 99 Site, Milton, Washington.* April 16, 2020.

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.

No

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

The cleanup action in the Core Remediation Area for the USG Highway 99 site will be conducted under an Agreed Order with the Washington State Department of Ecology; therefore, the cleanup action is exempt from the procedural requirements of certain laws and all local permits (WAC 173-340-710[9][a]) but must comply with the substantive requirements of these laws and permits. WSDOT will be conducting remediation work on its P429 Plus property and of Hylebos Creek as an independent cleanup action and therefore the exemption does not apply. See #12 for a full description of the Core Remediation Area and the P429 Plus property. Applicable requirements, but are not necessarily limited to:

- The Clean Water Act (33 USC 1251 et seq.)
- National Toxics Rule (40 CFR 131.36 et seq.)
- Comprehensive Environmental Response, Compensation, and Liability Act of 1980
- (42 USC 9601 et seq. and 40 CFR 300)
- Resources Conservation and Recovery Act (40 CFR Part 261 through 265, 268, 270,
- and 271)
- Endangered Species Act (16 USC § 1531 et seq.)
- Native American Graves Protection and Repatriation Act (25 USC 3001 through 3113;
- 43 CFR Part 10)
- Archaeological Resources Protection Act (16 USC 470aa et seq.; 43 CFR Part 7)
- National Historic Preservation Act (16 USC 470 et seq.; 36 CFR Parts 60, 63, and 800)
- MTCA (Revised Code of Washington [RCW] 70.A.305)
- MTCA Cleanup Regulations (WAC 173-340)
- Sediment Management Standards (WAC 173-204)
- Washington State Environmental Policy Act (RCW 43.21)
- Water Quality Standards for Washington Surface Waters (Chapter 173 201A WAC)
- Washington State Shoreline Management Act (RCW 90.58, Chapter 173 18 WAC, Chapter 173-22 WAC, and Chapter 173-27 WAC)
- Washington Underground Injection Control Program (Chapter 173-218 WAC)
- Washington State Hydraulics Projects Approval (RCW 77.55; Chapter 220-110 WAC)
- Washington Dangerous Waste Regulations (Chapter 173-303 WAC)
- Washington's Indian Graves and Records Law (RCW 27.44); Archaeological Site Assessment Requirements (RCW 27.44 and 27.53)

- State of Washington Worker Safety Regulations.

11. Give a 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.)

From 1971 through 1973, industrial waste from USG's Tacoma, Washington plant was used as fill at the site. The USG Tacoma plant used ASARCO slag as a raw material for mineral fiber production. ASARCO slag was produced as a result of lead and copper ore smelting and was later found to contain high concentrations of arsenic. The industrial waste generated by USG through use of this slag also contained high concentrations of arsenic. In the early 1980s, USG became aware of the association between ASARCO slag and arsenic contamination. USG conducted a source removal action in 1984/1985 at the site whereby approximately 20,000 to 30,000 cubic yards of waste fill and native soil was excavated and disposed at an offsite landfill. USG conducted post-remediation groundwater monitoring. In 2006, USG conducted an environmental site assessment at the site. The assessment showed that arsenic concentrations at the site still exceeded the Washington State Model Toxics Control Act (MTCA) Method A cleanup levels of 20 milligrams per kilogram (mg/kg) in soil and 5 micrograms per liter (µg/L) in groundwater.

There are three phases of this project to be conducted by two different entities: USG and WSDOT. The scope of each phase is described briefly below.

Phase 1: USG proposes to treat vadose and saturated soils within a presently vacant property that was most recently occupied by Discount RV (site location and features described in #12 below). The area of remediation on this property is referred to as the Core Remediation Area, where all soils that exceed a concentration of 250 mg/kg arsenic will be treated; the treatment methodology will also treat significant quantities of soil with lesser arsenic concentrations. The method of treatment is called in situ solidification and stabilization (ISS). Based on the results of treatability studies, the recommended ISS mix for the Highway 99 site consists of Portland Cement at a dosage rate of 13 percent by weight, bentonite at a dosage of 1 percent by weight, and ferrous sulfate heptahydrate at a mass ratio of about 20:1 to the arsenic concentration, equivalent to a mass ratio of 4:1 iron to arsenic.

Treatment will begin by excavating the top five feet of soils and temporarily stockpiling them onsite. These are clean soils that were used as backfill during the initial remedial action. Once these soils have been excavated, mass stabilization by ISS treatment will commence using an excavator to place and mix in the admixture. The treatment area will be divided into multiple "cells" and the excavator will complete work in one cell before moving to another. After completing the ISS, the temporarily stockpiled soil will be used to backfill the remainder of the excavation. Excess soil is anticipated, some of which may be used to increase the site grade slightly; excess soil will be disposed of at an appropriate offsite facility (e.g., Subtitle D landfill). The site surface will be re-paved similar to pre-construction conditions.

Phase 2: WSDOT will also be conducting remedial actions on the property south and adjacent to the Core Remediation Area, referred to as the P429 Plus property. The planned remedial action differs than in the Core Remediation Area in that WSDOT will be conducting excavation and offsite disposal of all soils containing arsenic at concentrations greater than 20 mg/kg. WSDOT will then be rerouting the Hylebos Creek through this property and develop the area on either side of the new creek bed as a riparian zone.

Phase 3: In addition to the excavation of the P429 Plus property, WSDOT will excavate and remove arsenic-contaminated sediment from the existing Hylebos Creek channel. The existing Hylebos Creek channel where this remediation occurs will serve only as an overflow ditch for an upstream wetland after this remediation occurs.

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.

USG's Highway 99 site is located in a commercial area situated between Pacific Highway East (aka Highway 99) and Interstate 5 (I-5) in Milton, Washington as shown on **Figure 1**. The western edge of the site is Pacific Highway East. The currently existing I-5 marks the eastern boundary of the site. Hylebos Creek and 70th Avenue East mark the southern boundary of the site.

While the site encompasses 8 parcels, the area of active remedial activities is focused on two vacant parcels that are situated south of Kanopy Kingdom (7110 Pacific Highway East, most recently occupied by Discount RV and is hereinafter referred to as the Core Remediation Area) and one of the parcels that was recently purchased by WSDOT (7100 Pacific Highway East) for planned freeway improvements, as well as a portion of the Hylebos Creek Channel. The WSDOT-owned parcel is presently being used as a lay-down area for current freeway construction activities. The WSDOT-owned parcel is referred to as the P429 Plus property because a WSDOT-owned right-of-way is also situated on the west side of the WSDOT P429 parcel (the same right-of-way also occupies a portion of the Discount RV parcel). **Figure 2** shows the parcel lines and areas occupied by these entities. For purposes of this SEPA, the Core Remediation Area and the P429 Plus property are referred to collectively as the "site" throughout the rest of this document.

B. Environmental Elements

1. Earth Find help answering earth questions

a. General description of the site:

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

The western portion of the site is relatively flat, but the site drops off sharply on the east where the surface slopes down either to Hylebos Creek. The Core Remediation Area is located at an elevation of approximately 20 feet above Mean Sea Level and is mostly asphalt paved, with a few concrete pads and minor areas near the creek

that are unpaved. The WSDOT P429 Plus property is level with the Core Remediation Area and has a combination of pavement and gravel surfacing.

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

59% slope to Hylebos Creek.

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.

Fill, Silty Sand

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

No

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.

The planned soil remedy for the Core Remediation Area employs in-situ methods and no soil fill is required. The site will be re-graded to a similar elevation as the current.

Following excavation of contaminated soil on the P429 Plus property, fill soil may be required to bring the site up to the design grade for the planned development of a riparian zone. If fill is needed, WSDOT's Design Builder will be responsible for determining the need and source of this material during the design phase.

Low permeability soil fill will be used to backfill excavated contaminated sediment in Hylebos Creek. The source of this fill will be determined by WSDOT's Design Builder.

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

Erosion could occur during excavation of the contaminated soil along the Hylebos Creek bed due to the steep slope.

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

The extent of the paved surface in the Core Remediation Area will be unchanged. The old, paved surface will be replaced with new.

On the P429 Plus property, any previous gravel and paved surfaces will be removed, and the property will developed as a riparian zone and a new channel of Hylebos Creek. The section of the existing channel for Hylebos Creek that undergoes remediation will become an overflow ditch for an upstream wetland.

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

Detailed plans and specifications will be prepared by USG's consultant and WSDOT's Design Builder to implement the remedial actions. These plans will be reviewed and approved by Ecology. Throughout the

implementation, water quality must meet the criteria of the NPDES Construction Stormwater General Permit and/or Section 401 Water Quality Certification or other regulatory requirements, as applicable.

Due to the potential for higher flow rates in the reconfigured portion of Hylebos Creek, the finished channel will include erosion control riprap.

2. Air Find help answering air questions

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.

Dust may be generated during application of the ISS amendments and during contaminated soil excavation. Dust generated can be easily managed with standard construction techniques such as watering.

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

No

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

Spray water to control dust during construction.

3. Water Find help answering water questions

a. Surface Water: Find help answering surface water questions

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.**

   Hylebos Creek is located on the eastern edge of the site. Hylebos Creek flows into Commencement Bay.

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.**

   Yes. Soil solidification will occur within 200 feet of the Hylebos Creek. WSDOT will conduct soil excavation within 200 feet of Hylebos Creek and will also excavate arsenic-impacted sediment from Hylebos Creek. The proposed plans for remediation in these areas area shown on Figures 3 and 4.

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.**

   The estimated amount of impacted sediment that will be removed for Hylebos Creek remediation is 320 bank cubic yards. This will be replaced with an equal amount of fill. The fill source has not yet been identified.

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

Yes. Coffer dams will be constructed at both ends of the impacted sediment area. The creek water would be pumped or gravity flow around the coffer dams. The impacted sediment would then be excavated from the creek bed.

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

   Hylebos Creek is within the 100-year floodplain.

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

   No

b. Ground Water: Find help answering ground water questions

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 a general description, purpose, and approximate quantities if known.**

   The need for dewatering during soil excavation on the WSDOT P429 Plus property is anticipated. The Design Builder will be responsible for permitting, treatment, and discharge/disposal of this water – either to surface water or to the sanitary sewer.

   Minimal quantities of groundwater will be periodically withdrawn during monitoring well purging and sampling as part of verification monitoring. Expected quantities per groundwater monitoring round are 5 to 15 gallons and this purged water will drummed, profiled and appropriately disposed of.

   There is no plan to discharge water to groundwater.

2. **Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (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.**

   Waste material will not be discharged into the ground as a part of the remediation.

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.**

   The completed riparian zone will encourage infiltration and result in slower runoff. Hylebos Creek receives stormwater runoff from this area, which flows into Commencement Bay, which is unchanged from pre-remediation conditions.

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

   No.

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

WSDOT's plan to restore the remediation area on the P429 Plus property as a riparian zone and the new Hylebos Creek channel does affect the drainage patterns, but is considered environmentally beneficial.

4. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any.

4. Plants Find help answering plants questions

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

- ☐ **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**

The site is primarily paved and developed. There is an area of grass along Hylebos Creek, but few trees or shrubs. The wet soil plants alongside Hylebos Creek are limited and the creek does not presently support a complex habitat.

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

Wetland soil plants and grass along the Hylebos Creek channel will be removed as a part of sediment excavation.

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

No threatened or endangered plant species are known to occur on or near the site.

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

The P429 Plus property will be a planned riparian restoration area. As such, this will include planting with native species appropriate for the site. The old Hylebos Creek bed where remediation occurred will likely be reseeded with native grass species.

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

None presently known.

5. Animals Find help answering animal questions

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

- birds: herons may utilize the creek, and songbirds adapted to urban areas (house sparrows, starlings), may occur in the grass.
- mammals: small mammals such as raccoon may utilize the creek area occasionally
- Fish: several species of salmon may occur in the creek (see below). Likely other species such as bass and sunfish also occur.

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

The following species can occur in Hylebos Creek:

- Chinook salmon (*Oncorhynchus tshawytscha*), federally threatened and designated critical habitat, state species of concern
- Steelhead (*Oncorhynchus mykiss*), federally threatened (and proposed critical habitat)
- There are documented occurrences of Pacific pond turtle (*Actinemys marmorata*), a federal species of concern, state endangered species, nearby. However, given the lack of suitable habitat it is unlikely for this species to occur at the site.

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

Yes, Hylebos Creek is a migratory route for salmonid species; however, there is presently no riparian vegetation at the site and very little habitat for other aquatic or terrestrial species.

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

The planned riparian restoration area and relocation of Hylebos Creek will enhance wildlife in the area.

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

None known

6. Energy and Natural Resources Find help answering energy and natural resource questions

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.

No significant sources of energy will be required for the completed the cleanup.

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

No

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

In situ methods proposed to treat contaminated soil and groundwater conserve energy inherently. No other energy conservation methods are proposed.

7. Environmental Health Find help with answering environmental health questions

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

Exposure to arsenic may occur during remedial activities, as well as the physical hazards associated with the construction methods to be employed.

Environmental

1. Describe any known or possible contamination at the site from present or past uses.

See the prior discussion of existing contamination.

a. 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.

There are no hazardous underground utilities in the project area. Above ground electrical poles adjacent to the excavation/ISS treatment area will be removed or supported prior to construction activities.

b. 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.

No toxic or hazardous chemical use is proposed at this time.

c. Describe special emergency services that might be required.

As with any construction project, ambulance service may be needed if an accident occurs during construction (e.g., solidification, excavation).

d. Proposed measures to reduce or control environmental health hazards, if any.

Construction workers and oversight staff will be trained in accordance with Occupational Safety and Health Administration HAZWOPER Standard 1910.120. Project health and safety plans will be developed to establish requirements to ensure that employees will wear appropriate personal protective equipment while working at the site and will follow proper decontamination procedures. Daily tailgate safety meetings will be held to discuss safety topics of the day.

b. Noise

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

The site is located between I-5 and Pacific Highway East. I-5 is associated with a large amount of traffic and traffic noise year-round. We do not expect this noise will affect the project, however.

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)?

Soil excavation and ISS mixing operations will create construction noise on a short-term basis during normal working hours. No significant short-term traffic or operation noise, or long-term noises of any kind are expected.

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

None proposed.

8. Land and Shoreline Use Find help answering land and shoreline use questions

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.

The parcels undergoing remediation are presently vacated. The adjacent parcel to the north is occupied by a retail truck canopy business, to the south the parcel is a part of the WSDOT construction project, to the west is Highway 99 and to the east is I-5. The proposal will not affect these land uses.

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 because 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?

Not in the recent past.

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?

No.

c. Describe any structures on the site.

There is a small shed on the site, none other than that.

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

The shed will be removed.

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

The site is currently zoned M-1: Light Manufacturing District.

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

The site is zoned M-1: Light Manufacturing District in the current comprehensive plan.

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

The shoreline master program designation of the site is Urban Conservancy.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

The site is situated within a high-risk seismic hazard area. The eastern edge of the site (Hylebos Creek) is situated within a FEMA Flood Hazard Area.

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

None

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

None

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

Not Applicable

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

An environmental covenant will be implemented to restrict future land use.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any.

Not Applicable

9. Housing Find help answering housing questions

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

No housing units will be constructed by this project.

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

No housing units will be eliminated by this project.

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

Not applicable as the project will not construct or eliminate any housing units.

10. Aesthetics Find help answering aesthetics questions

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

Not applicable as this project does not include construction of any structures.

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

Eventually trees that are planted in the restoration project area will obstruct some of the view.

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

None

11. Light and Glare Find help answering light and glare questions

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

Remedial activities will occur during daylight hours and no artificial lights will be used. No light or glare will be generated by the completed project (i.e., no permanent lights will be installed).

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

No light or glare will be generated by the completed project.

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

The existing lighting from adjacent businesses and highway street lights/traffic will not affect the project.

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

Not applicable as no lights will be installed as a result of this project.

12. Recreation Find help answering recreation questions

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

There are none.

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

No

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

Not applicable; the completed project will not displace any existing recreational uses.

13. Historic and Cultural Preservation Find help answering historic and cultural preservation questions

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.

No

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.

None recorded by Washington Department of Archaeology and Historical Preservation (DAHP) or the Nisqually Indian Tribe.

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.

USG had an Inadvertent Discovery Plan (IDP) completed for the Core Remediation Area and WSDOT had a Cultural Resources Investigation completed to support the NEPA Re-Evaluation of the SR-167 Extension project, of which the P429 Plus property is within.

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.

According to the IDP, in the event that archaeological deposits are inadvertently discovered during any portion of the remedial action, ground-disturbing activities in the vicinity of the find will cease. Ecology will be notified and then Ecology will contact the DAHP and the interested Tribes, as appropriate.

14. Transportation Find help with answering transportation questions

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.

Pacific Highway E. (also known as Highway 99) services the site. Access to Pacific Highway E. will be by existing driveways.

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?

Yes; the site is serviced by Pierce Transit Route 500.

c. 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).

No

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

No.

e. 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?

The only vehicular trips generated by the completed project, will be for the required periodic groundwater sampling.

f. 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.

No

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

Not applicable as the completed project will not generate additional vehicular trips or impact transportation.

15. Public Services Find help answering public service questions

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.

No

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

Not applicable; no additional public services will be needed as a result of this project.

16. Utilities Find help answering utilities questions

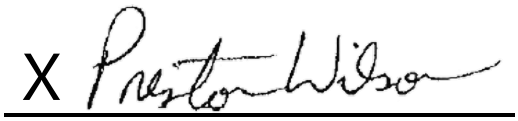
a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

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

The completed project will not require any utilities.

C. Signature Find help about who should sign

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.

X 

Type name of signee: Preston Wilson

Position and agency/organization: Environmental Services Manager/USG Corporation

Date submitted: 3/30/2023

D. Supplemental sheet for nonproject actions

Find help for the nonproject actions worksheet

IT IS NOT REQUIRED to use this section 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?**

   It is unlikely. The intent of the proposal is to reduce and control the release of toxic substances (i.e., arsenic).

   - **Proposed measures to avoid or reduce such increases are:**

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

   When WSDOT has completed the soil removal, the completed riparian zone will enhance plant, wildlife, and fish habitat.

   - **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?**

   Unlikely

- **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?**

   See #2 above.

   - **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?**

   There will be no affect on land and shoreline use.

   - **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?**

   There will be no increased demands on public services or 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.**

   The proposal will not conflict with local, state, or federal laws or requirements for protection of the environment.

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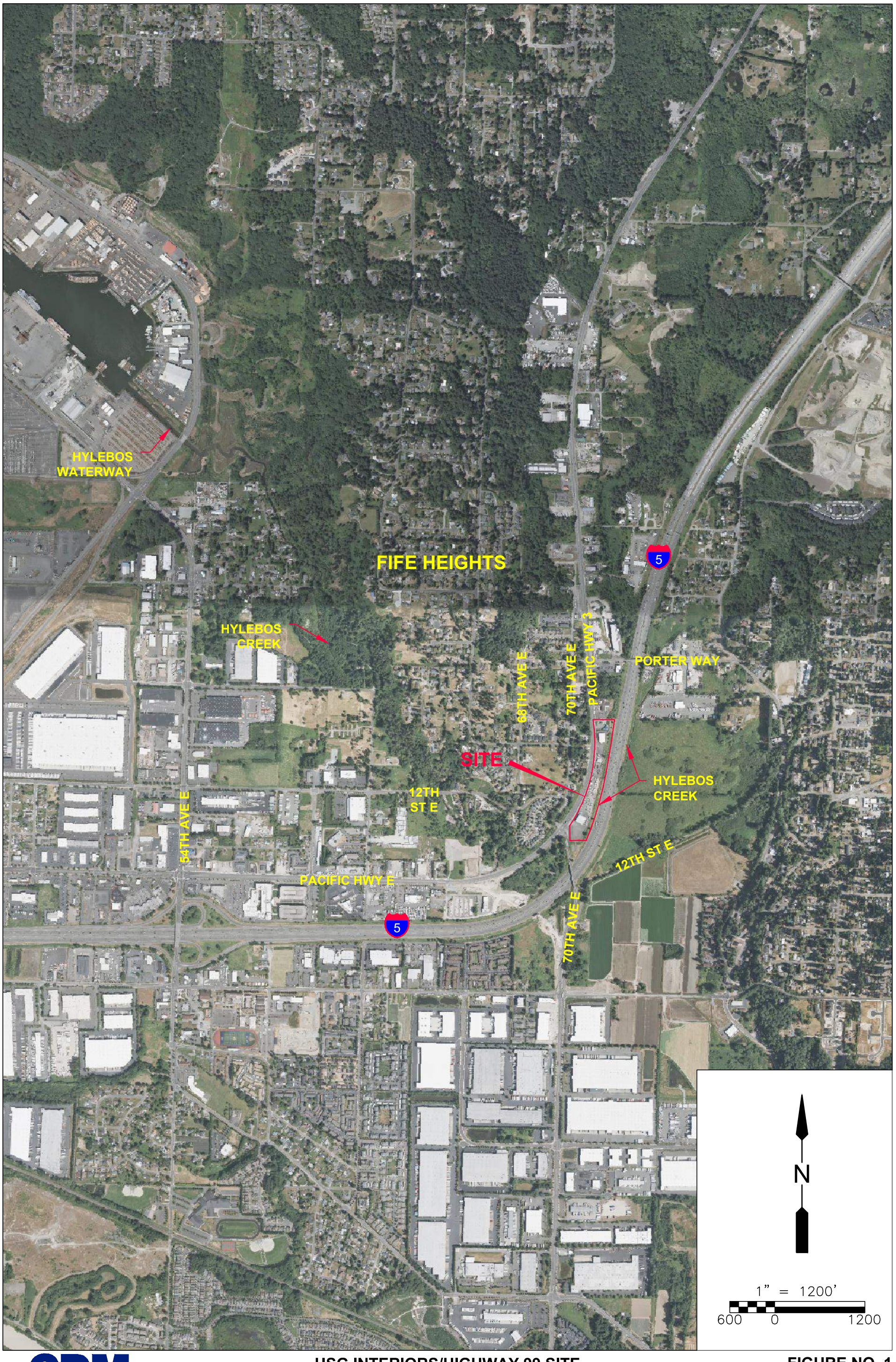

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CDM Smith

USG INTERIORS/HIGHWAY 99 SITE
MILTON, WASHINGTON

FIGURE NO. 1
VICINITY MAP

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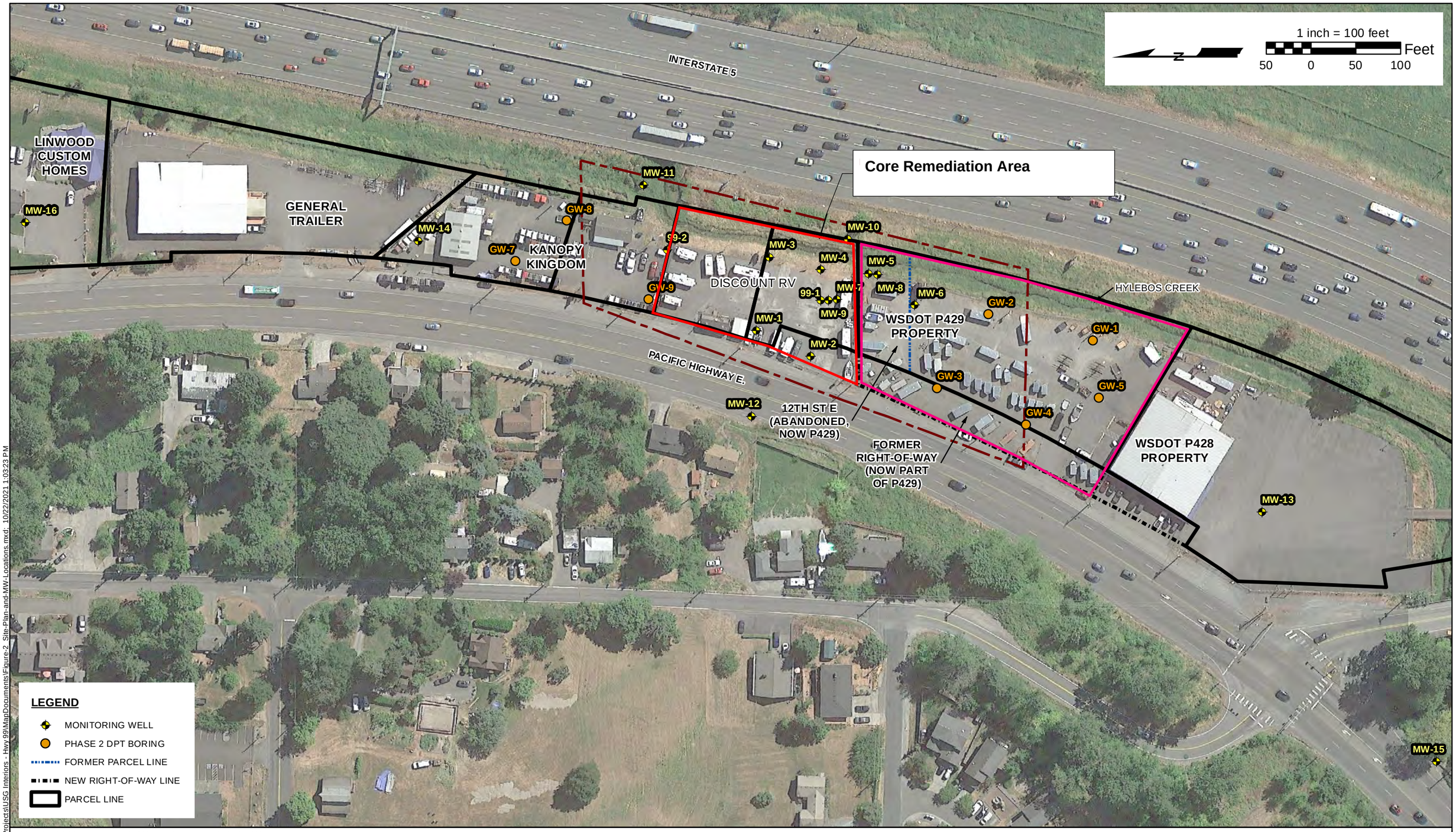

SOURCE: GOOGLE EARTH PRO, 2021, IMAGE DATE AUGUST 20, 2020

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USG INTERIORS/HIGHWAY 99 SITE
MILTON, WASHINGTON

FIGURE NO. 2

SITE PLAN

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N

PLAN

1" = 30'

1" = 30'

15 0 30

LEGEND:

MODELED IMPACTED SOILS EXCEEDING 250 PPM TOTAL ARSENIC.

TREATMENT AREAS.

NOTES:

1. BASEMAP PROVIDED FROM DRAWING ENTITLED "USG HWY 99 REMEDIAL INVESTIGATION SURVEY" PREPARED BY WH PACIFIC INC. ON JUNE 10, 2020.
2. ELEVATIONS NOTED ARE IN FEET AND BASED ON HORIZONTAL DATUM NAD 83 WASHINGTON STATE PLANE, SOUTH ZONE AND VERTICAL DATUM NGVD–88

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USG INTERIORS/HIGHWAY 99 SITE
MILTON, WASHINGTON

FIGURE NO. 3
PROPOSED TREATMENT AREA
OF ARSENIC > 250 PPM IN SOIL - PLAN VIEW

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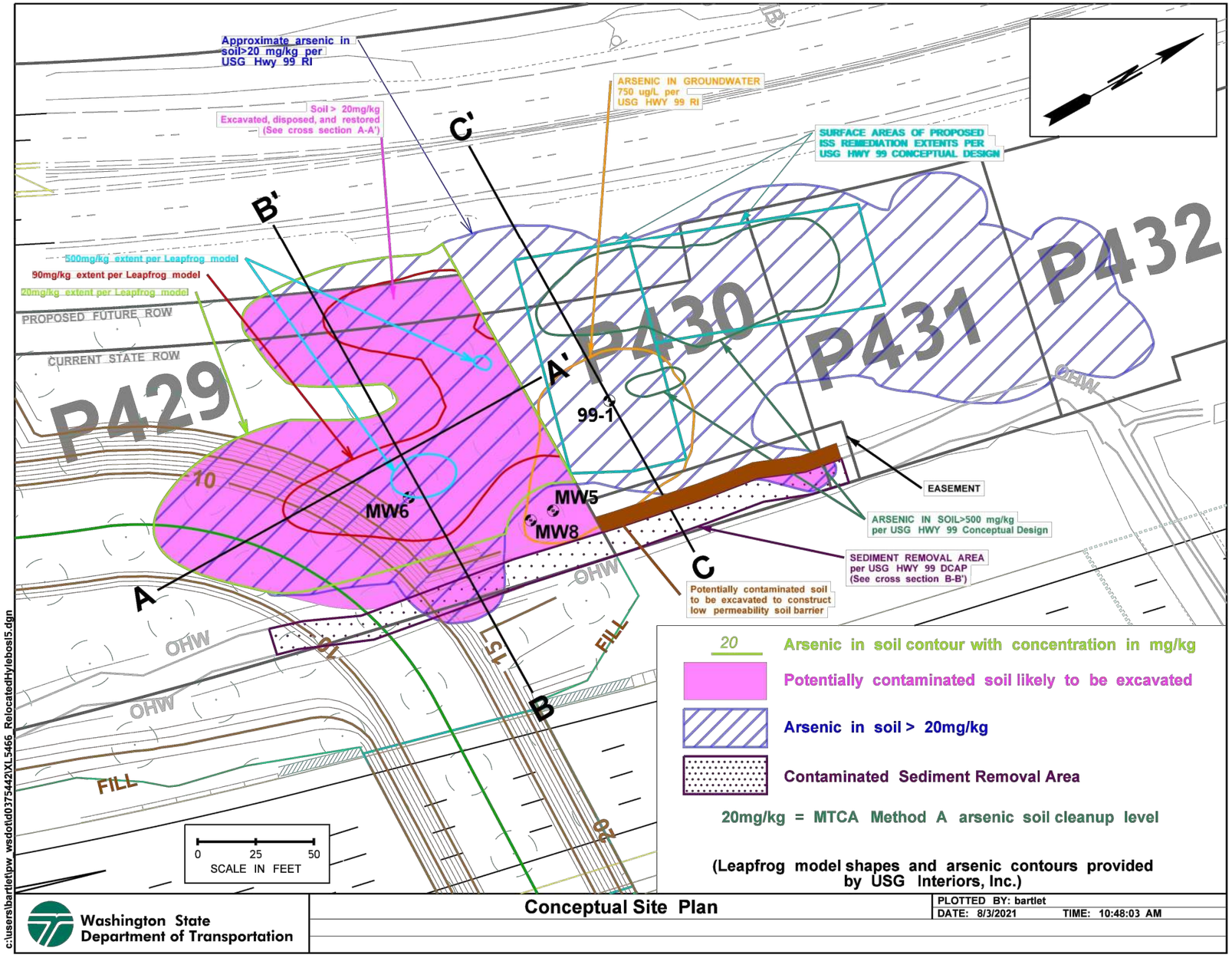

REFERENCE: INNOVEX ENVIRONMENTAL MANAGEMENT, INC. 2021. SR 167/I–5 TO SR 509 – NEW EXPRESSWAY, USG HIGHWAY 99 SITE, HYLEBOS CREEK CONTAMINATED SEDIMENT REMOVAL AND PARCEL P 429 PLUS SOIL EXCAVATION, INTERIM ACTION WORK PLAN, PREPARED FOR WASHINGTON STATE DEPARTMENT OF TRANSPORTATION. SEPTEMBER 15.

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CDM Smith

USG INTERIORS/HIGHWAY 99 SITE
MILTON, WASHINGTON

FIGURE NO. 4
PLANNED REMEDIAL EXCAVATION WSDOT P429 PLUS PROPERTY AND CREEK BED - PLAN VIEW

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