Soil Management Plan

Seahawks Headquarters and Practice Facility – North and South Baxter Properties

Renton, Washington

Prepared by:

AECOM Environment
710 Second Avenue, Suite 1000
Seattle, Washington 98104

AECOM Project Number: 12468-001-400

Prepared for:

The Port Quendall Company
c/o Vulcan Inc.
505 Fifth Avenue South
Seattle, Washington 98104

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1 Plan Scope and Purpose

Soil at the J. H Baxter North and South Properties (Sites) located in Renton, Washington (Figure R-1) was the subject of remediation activities in conjunction with development work at the Sites. The remediation work was conducted to satisfy the requirements specified in the Prospective Purchaser Consent Decrees (between Washington State Department of Ecology [Ecology] and Port Quendall Company), form Environmental Covenants, and Cleanup Action Plans (CAPs) (ThermoRetec, 2000b and ThermoRetec, 2000c). As part of development activities for the Sites, Football Northwest LLC (Owner), successor owner to the Port of Quendall Company, redeveloped the North and South Baxter properties as the location of the Seattle Seahawks Headquarters and Training Facility. The cleanup activities completed at the Sites in 2007 and 2008 (environmental capping and institutional controls) are outlined in the *Engineering Design Report* (EDR; RETEC, 2006) and were required to complete cleanup obligations in accordance with the Consent Decrees. Earlier cleanup activities were performed on the South Baxter property in 2002 and 2004 and certified as completed by a Partial Certificate of Completion letter issued by Ecology on April 10, 2006.

This Soil Management Plan (SMP) addresses procedures associated with post-site-development penetration of the environmental cap and excavation of contaminated soil located below the environmental cap and the indicator layer. These SMP procedures include health and safety standards, soil stockpiling, analytical testing, and soil reuse or disposal options at the Site as specified in the CAPs and form Environmental Covenants (August 4, 2010), as approved in the attached letter from Ecology (Attachment A). In the event of a conflict between the SMP and the Environmental Covenants negotiated for the Sites, the Environmental Covenants shall govern. In accordance with these documents, soil must be handled and managed in a manner that is protective of human health and the environment. Site maintenance staff and contractors shall follow the procedures outlined in this document during maintenance and construction activities at the Sites.

The SMP will be periodically updated as necessary and re-submitted to Ecology for review and approval to ensure compliance with applicable regulatory requirements and continued protection of human health and environment.

2 Location of Contaminated Soil

The Sites were undeveloped until the mid-1950s, when a wood treating facility was constructed on the Sites. Both creosote and pentachlorophenol (PCP) treating solutions were used. Creosote was used to treat railroad ties

and pilings and PCP solutions were used to treat utility poles. Wood was treated and stored predominantly on the South Property; although some treated wood storage may have occurred on the North Property. Wood treating operations ceased in 1981. The North Property was then used on a limited basis for bark mulch storage.

Contamination is present within pre-development site soil throughout the Sites. The extent of contamination was described in the Feasibility Studies and CAPs prepared for the Sites, copies of which are maintained by the Owner (see References). Some contaminated soil was regraded with Ecology pre-approval during site development, so previous maps may no longer be accurate or fully relevant. As a guide during maintenance and construction activities, a visual indicator layer has been placed above any contaminated soil on the Sites. In most areas, the indicator layer is a woven geotextile. A product data sheet of the woven geotextile is provided in Attachment B. In a few areas, a 30-mil geomembrane was used as both the physical barrier and the visual indicator. A product data sheet of the 30-mil geomembrane is provided in Attachment C. Figure R-2 illustrates the site areas where each of these visual indicators were used to indicate the presence of underlying contaminated soil.

3 Environmental Caps

Environmental caps are present throughout the site, to within 25 feet of the Lake Washington shoreline or to the waterside edge of the wetland buffer.

There are numerous types and sections of environmental caps that were developed to integrate protection of human health and the environment with site development. Figure R-3 provides a plan view illustration of the locations of the various caps. Figures R-4 through R-8 provide section details for each of the various cap types. Attachment D provides a large-size drawing of both the cap locations and sections that can be posted for maintenance staff and contractors.

4 Notification Requirements

Limited excavation, utility placement or repair, minor site grading, or other Ecology pre-approved activities related to construction are permitted as long as appropriate health and safety protocols specified in this document are followed and a structure or cap that provides protection from direct contact, as required by the CAP, is provided. Structure or cap maintenance is permitted without notice to Ecology as long as appropriate health and safety protocols specified in this document are followed.

In the event that future construction activities are planned at the Sites that are beyond the scope of activities described above, the Owner will notify Ecology pursuant to the Environmental Covenants negotiated for the Sites (as conformed copies of the Environmental Covenants provided in Attachment E). The notification will include a description of work to be performed and the procedures to be used including: 1) health and safety standards; 2) soil stockpiling and analytical testing protocols; 3) soil reuse or disposal plans; 4) other methods to prevent the spread of contaminated soils to uncontaminated areas, if necessary; and 5) materials and methods for replacing the environmental capping system. The Owner will notify Ecology immediately in the event of a hazardous substance release from onsite activities.

5 Soil Handling Procedures

The following minimum procedures shall be followed for handling any soil associated with future planning and construction activities at the Sites.

5.1 Prior to Completing Work Activities

1) Determine location, nature, and anticipated depth of work activities and include the details on project specific figures.

2) Identify stockpile locations for temporary storage of soil material. The location of these stockpiles may be determined based on field activities, and should take into consideration proximity to receptors (including the Lake Washington, storm drains, site traffic, and ecological receptors). All stockpiling of soil at the site shall follow sediment erosion and control best management practices including runoff control and catch basin protection. Stockpiles shall be managed to minimize groundwater infiltration. Stockpile locations shall be protective of sensitive areas (wetlands, storm drains and the Lake Washington).

5.2 During Work Activities

Soil handled during construction shall be managed in accordance with the following procedures:

1) Follow appropriate health and safety procedures. Work in these areas shall require that workers are appropriately trained in accordance with OSHA standards for worker protection.

2) If import fill is used for backfilling operations, the fill material shall be obtained from an approved source and meet the requirements specified in the project specifications.

3) Soil removed from site areas as part of construction activities that penetrate the environmental cap shall be temporarily placed in the stockpile area (see 4, below, for stockpiling procedures).

   a. This soil may be reused on site as long as it is placed beneath an environmental cap.

   b. Soil that cannot be reused on site beneath the restored environmental cap shall be characterized for shipment and disposal at an approved offsite facility. At a minimum, samples collected from the excavated soil stockpile shall be analyzed for polynuclear aromatic hydrocarbons (PAHs) and PCP by Method 8270.

4) The following soil stockpiling procedures shall be followed:

   - Soil shall be covered with weighted plastic sheeting or tarp at the end of each working day and during periods of precipitation.

   - Contaminated soil stockpiles shall be placed on a continuous 20-mil (minimum thickness) liner that extends under the entire stockpile area.

   - Stockpiles shall be constructed to prevent surface water that comes into contact with the soil from running out of the stockpile area. They shall also be constructed to prevent clean surface water from running onto the stockpile area.

   - Transport of soil between excavation and stockpile areas shall be performed to minimize the potential for spread of contamination. Any soil spillage shall be immediately collected by sweeping or vacuuming.

5) For disposal of contaminated soil, the soil shall be managed in accordance with applicable state and federal regulations and based on the characterization sampling results. This will include adherence to transportation requirements, receiving pre-approval from a disposal facility, manifesting, record keeping, etc., as appropriate to the material. The disposal facility shall be a regulated licensed facility that is authorized to receive the waste material. Copies of all approved soil profiles from the disposal facility and weight tickets for each truckload of soil disposed shall be promptly obtained.

6 Decontamination

6.1 Equipment

Any equipment working with contaminated soil shall be decontaminated prior to working with clean soil or leaving the Sites. Only those portions of the equipment contacting contaminated soil need to be decontaminated. Decontamination shall be accomplished by means of removing dry soil by brushing, or washing off of soil using water. All soil and water generated by this process shall be contained and managed as contaminated.

Approved methods for containment of decontaminated soil and water are:

1) Holding the portion of the equipment that contacted contaminated soil (such as an excavator bucket or drill augers) over an area of contaminated soil, either in the excavation or in a truck, and brushing or rinsing that portion of the equipment so that the water and soil fall onto the contaminated soil below (this method applies primarily to heavy equipment).

2) Establishment of a decontamination area at the boundary between contaminated and uncontaminated soil, consisting of an area graded to drain into water collection system, a minimum of two layers of 6-mil or greater continuous plastic sheeting, and plywood placed on equipment travel areas to prevent equipment from tearing the plastic sheeting; or

3) Pressure washing within equipment or a structure specifically designed to contain the washed materials and waters and operated to prevent inadvertent release of these materials.

6.2 Personnel

Personnel walking on contaminated soil and working with contaminated water should be protected through the use of appropriate personal protective equipment (PPE) and according to the procedures in the contractor health and safety plan. To prevent spreading of contaminated materials, personnel shall be decontaminated after walking on or working in contaminated soil, and prior to working with uncontaminated materials or leaving the facility. Work is typically anticipated to occur in Level D PPE, which normally consists of long pants, steel-toed boots, hard hat, safety glasses, and gloves when necessary. For decontamination of this level of PPE, visible soil or waters shall be removed from PPE. This may be accomplished by brushing or washing in an equipment decontamination area, or establishment of a separate personnel wash. An approved personnel wash consists of a plastic tub containing clean

water and a boot brush in which the water is changed daily. Higher level of PPE may be required depending on site construction activities.

6.3 Water Management

Water resulting from decontamination shall be containerized in labeled 55-gallon drums or other appropriate containers. At a minimum, water samples will be collected and analyzed for PAH and PCP by EPA Method 8270. Water shall be handled in accordance with state and federal regulations based on the concentrations of contaminants found in the decontamination water. Likely disposal options, depending on concentrations include permitted discharge to a metro sanitary sewer or treatment at a licensed treatment facility.

7 Health and Safety

Work shall be performed consistent with health and safety requirements. A health and safety plan shall be developed to follow all local, state and federal guidelines for health and safety standards and guidelines implemented through, but not limited to, the Occupational Safety and Health Act (OSHA), the National Institute for Occupational Safety and Health (NIOSH), the American Conference of Governmental Industrial Hygienists (ACGIH), and the United States Environmental Protection Agency (USEPA). Workers trained and monitored according to the HAZWOPER Requirements (OSHA 40-hour trained) shall be used at the site during soil handling activities. The appropriate level of personnel training and equipment for personnel shall consider OSHA Section 1910.120(e)(3)(i) in making such a determination.

8 References

Shannon and Wilson, 2006. *Geotechnical Report, Seahawks Headquarters and Practice Facility, Renton, Washington.* Prepared for Football Northwest, LLC. September 13.

The RETEC Group, Inc. (RETEC), 2002. *Engineering Design Report: J.H. Baxter South Property*. Prepared for Port Quendall Company, May 2002.

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ThermoRetec Consulting Corporation (ThermoRetec), 2000a. *Feasibility Study: J.H. Baxter South Property*. Prepared for Port Quendall Company, April 2000.

ThermoRetec, 2000b. *Cleanup Action Plan: J.H. Baxter South Property*. Prepared for Port Quendall Company, April 2000.

ThermoRetec, 2000c. *Feasibility Study and Cleanup Action Plan: J.H. Baxter North Property*. Prepared for Port Quendall Company, April 2000.

Woodward-Clyde Consultants, 1990. *Draft Remedial Investigation Report, J.H. Baxter, Renton, Washington*. Prepared for J.H. Baxter Company. December 1990.

Attachment A

Letter from Ecology

Note: Attachment A will be provided upon receiving the letter from Ecology.

Attachment B

Geotextile Product Data Sheet

Attachment C

Geomembrane Product Data Sheet

Attachment D

Drawing

Attachment E

Environmental Covenants