ECOLOGY LOGO

Site-Specific Cleanup Action Plan (SCAP)

Development Sites 8 and 9
Tacoma, Washington

FSID # 30005

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Table of Contents

[1.0 Introduction 1](#_Toc391542449)

[2.0 Summary of site background and conditions 2](#_Toc391542450)

[2.1. Regulatory Framework 2](#_Toc391542451)

[2.2. Site Description and Current Conditions 3](#_Toc391542452)

[2.3. Description of Adjacent Sites 7](#_Toc391542453)

[2.3.1. Dock Street ROW 7](#_Toc391542454)

[2.3.2. 11th Street ROW 8](#_Toc391542455)

[2.3.3. 1147 Dock Street Property 8](#_Toc391542456)

[2.3.4. Thea Foss Waterway 9](#_Toc391542457)

[2.4. Historical Land Use 10](#_Toc391542458)

[3.0 Summary of Site characterization Results 11](#_Toc391542459)

[3.1. Fill and Soil Characteristics and Quality 12](#_Toc391542460)

[3.2. Groundwater Characteristics and Quality 13](#_Toc391542461)

[3.3. Summary of Site Contaminants and Conditions 14](#_Toc391542462)

[4.0 Emergency Interim Action 14](#_Toc391542463)

[5.0 Cleanup Action Requirements 17](#_Toc391542464)

[5.1. Thea Foss Redevelopment Cleanup Action Plan 17](#_Toc391542465)

[5.2. Land Use and Proposed Redevelopment Plan 17](#_Toc391542466)

[5.3. Site Cleanup Standards 19](#_Toc391542467)

[5.3.1. Soil Cleanup Standards 19](#_Toc391542468)

[5.3.2. Groundwater Cleanup Standards 19](#_Toc391542469)

[5.4. Remedial Actions for the Proposed Redevelopment and Site Use 20](#_Toc391542470)

[5.4.1. Remediation of Excavated Soil 20](#_Toc391542471)

[5.4.2. Isolation Beneath Soil or Pavement Caps 21](#_Toc391542472)

[5.4.3. Over-Excavation or Lining of Excavation Areas 21](#_Toc391542473)

[5.4.4. Institutional Controls 21](#_Toc391542474)

[5.4.5. Compliance Monitoring 21](#_Toc391542475)

[6.0 Site-specific cleanup action plan 21](#_Toc391542476)

[6.1. Site Preparation and Demolition 22](#_Toc391542477)

[6.2. Remediation of Excavated Soil 23](#_Toc391542478)

[6.3. Isolation Beneath Soil or Pavement Caps 26](#_Toc391542479)

[6.4. Over-Excavation or Lining of Excavation Areas 27](#_Toc391542480)

[6.5. Institutional Controls 27](#_Toc391542481)

[6.6. Compliance Monitoring 27](#_Toc391542482)

[7.0 Cleanup Action Evaluation Criteria 28](#_Toc391542483)

[7.1. Threshold Requirements 28](#_Toc391542484)

[7.1.1. Protection of Human Health and the Environment 29](#_Toc391542485)

[7.1.2. Compliance with Cleanup Standards 29](#_Toc391542486)

[7.1.3. Compliance with Applicable State and Federal Laws 29](#_Toc391542487)

[7.1.4. Provision for Compliance Monitoring 30](#_Toc391542488)

[7.2. Additional Evaluation Criteria 30](#_Toc391542489)

[7.2.1. Short-Term Effectiveness 30](#_Toc391542490)

[7.2.2. Long-Term Effectiveness 31](#_Toc391542491)

[7.2.3. Permanent Reduction of Toxicity, Mobility, or Volume 31](#_Toc391542492)

[7.2.4. Implementability and Technical Feasibility 31](#_Toc391542493)

[7.2.5. State and Community Acceptance 32](#_Toc391542494)

[7.2.6. Cost 32](#_Toc391542495)

[8.0 IMPLEMENTATION OF THE CLEANUP ACTION 32](#_Toc391542496)

[8.1. Anticipated Schedule for Design and Implementation 34](#_Toc391542497)

[9.0 Limitations 34](#_Toc391542498)

[10.0 References 35](#_Toc391542499)

List of Figures

Figure 1. Vicinity Map

Figure 2. Site Aerial

Figure 3. Site Plan

Figure 4A. Current Conditions – Development Site 9

Figure 4B. Current Conditions – Development Site 8

Figure 5. Historical Land Use

Figure 6A. Cross Section – Development Site 9

Figure 6B. Cross Section – Development Site 8

Figure 7A. Summary of Exceedances in Soil and Groundwater – Development Site 9

Figure 7B. Summary of Exceedances in Soil and Groundwater – Development Site 8

Figures 8 & 9. Proposed Cleanup Action Plan

List of tables

Table 1. Soil and Groundwater Cleanup Levels and Soil Contamination Maximums

Table 2. Site-Specific Applicable and Relevant and Appropriate Requirements (ARARs)

Table 3. Remedial Action Cost Estimate

Appendices

Appendix A. Area-Wide Consent Decree and Thea Foss Redevelopment Cleanup Action Plan

Appendix B. Draft Site-Specific Remedial Investigation Report

Appendix C. Sitts & Hill Survey Drawing

Appendix D. Emergency Interim Action Documentation

Appendix E. Regulated Building Material Survey Report

Appendix F. Replacement Esplanade Plans for Development Site 9

**Appendices consist of a 41.2 MB file and are available from Ecology upon request.**

1. Introduction

This Site-Specific Cleanup Action Plan (SCAP) has been prepared for Development Sites 8 and 9 (the Site) located at 1131 and 1119 Dock Street, respectively, in Tacoma, Pierce County, Washington (Figure 1). This SCAP was prepared to meet the requirements of the area-wide Consent Decree (CD) between the Washington State Department of Ecology (Ecology) and the City of Tacoma (City) and Foss Waterway Development Authority (FWDA) for remediation and redevelopment of City-owned, upland properties located adjacent to the Thea Foss Waterway (Ecology, 1994 and 2002, CD No. 94‑2‑10917‑6) and the Thea Foss Redevelopment Cleanup Action Plan (CAP) included as Exhibit C to the CD (Ecology, 1994). This SCAP has been prepared for the FWDA to support remediation and redevelopment of the upland portion of Development Sites 8 and 9 and identifies the remedial actions that are to be performed at the Site as part of redevelopment to meet the requirements of the CD and Thea Foss Redevelopment CAP.

Remediation of sediment present at the Site was completed in 2006 under an Administrative Order of Consent (AOC) (EPA, 1994) and CD (EPA, 2003) between the Environmental Protection Agency (EPA) and the City. Therefore, this SCAP does not include the requirements for remedial actions for sediment present at the Site.

The upland portion of the Site is currently used to provide public access and parking as well as access to the Foss Harbor Marina (Figure 2). The Site is proposed to be redeveloped for mixed-use commercial and residential use. Proposed land use plans include construction of a multi-story building or buildings at grade or with below grade parking, residential or commercial development on the ground floor, and residential housing on the upper floors. Proposed land use will also continue to include public access and open space as well as access to the Foss Harbor Marina. The proposed land use will require excavation for construction of building foundations, below grade parking, installation of utilities, as well as replacement of structures that support public access at the Site. Additionally, areas around the building will include asphalt/concrete pavement, landscaping, and open space.

This SCAP presents the cleanup actions required to be performed at the Site to support redevelopment of the Site for mixed commercial and residential land use in accordance with the area-wide CD (Ecology, 1994 and 2002; CD No. 94-2-10917-6) and the Washington State Model Toxics Control Act (MTCA) cleanup regulations [Chapter 173-340 Washington Administrative Code (WAC)]. Specifically, this SCAP has been prepared to:

* Describe the Site background and current conditions including an overview of the Site history and environmental conditions.
* Identify the media of concern and site-specific cleanup levels for the Site.
* Identify the land use and a conceptual redevelopment for the Site.
* Summarize the remedial action requirements specified in the Thea Foss Redevelopment CAP.
* Describe the remedial actions based on a conceptual redevelopment for the Site.
* Identify the estimated costs and assumptions for remedial actions.
* Describe the justification for the cleanup action for a conceptual redevelopment of the Site.
* Identify applicable State and Federal laws pertaining to the remedial actions.

Additionally, this SCAP describes an emergency interim action that was performed to remedy a failing bulkhead located on the shoreline of Development Site 9. The emergency interim action was performed by the City and included excavation and off-site disposal of contaminated soil present behind the failing bulkhead, removing the bulkhead and a wooden esplanade and capping the shoreline slope.

The following sections describe Site conditions, Site history and environmental conditions and summarize the cleanup action alternative specified in the Thea Foss Redevelopment CAP. Also presented are the remedial actions for soil and groundwater containing concentrations of total carcinogenic polycyclic aromatic hydrocarbons (cPAHs), petroleum hydrocarbons, arsenic, lead, and/or nickel at concentrations greater than cleanup levels.

1. Summary of site background and conditions
	1. Regulatory Framework

Development Sites 8 and 9 and the Thea Foss Waterway lie within the larger Commencement Bay Nearshore/Tideflats (CB/NT) Superfund Site. The CB/NT Superfund site encompasses approximately 10 to 12 square miles of shallow water, shoreline, and adjacent uplands, most of which is highly developed and industrialized land.

In the 1980s the City began to acquire property along the Thea Foss Waterway in an effort to spur environmental cleanup and redevelopment in downtown Tacoma within the CB/NT Superfund Site. Then, in 1994, the City voluntarily entered into an Administrative Order of Consent (AOC) with the EPA (EPA, 1994) for pre-remedial design investigation and remedial design for a portion of the Thea Foss Waterway and a CD (CD No. 94-2-10917-6) with Ecology for cleanup of the area encompassing the adjacent, City-owned upland properties. Cleanup work administered under the AOC (EPA, 1994) with EPA and CD (CD No. 94-2-10917-6) with Ecology are closely related, sharing a common boundary at mean higher high water (MHHW).

Under the AOC (EPA, 1994) as well as a CD (EPA, 2003) with EPA, the City completed remedial design and remediation of sediment within the portion of the Thea Foss Waterway from the “Mouth” of the Waterway (i.e., where the Thea Foss Waterway enters the larger Commencement Bay) to near the 21st Street Bridge, including the Wheeler-Osgood Waterway. The portion of the Thea Foss Waterway remediated by the City encompassed sediment at and below (i.e., water-ward) the MHHW line at Development Sites 8 and 9. Remediation of sediment within the Thea Foss Waterway by the City was completed in 2006. The remedial actions performed by the City at the Site are described further in Section 2.2.5 below and the Thea Foss and Wheeler-Osgood Waterways Remediation Project Remedial Action Construction Report (City of Tacoma, 2006a).

The area-wide CD (CD No. 94-2-10917-6) with Ecology for the City-owned upland properties adjacent to the Thea Foss Waterway specifically requires the following remedial actions to be performed at properties subject to the CD:

* Perform a remedial investigation (RI).
* Prepare a SCAP for soil contamination that is consistent with the Thea Foss Redevelopment CAP (i.e., Exhibit C to the CD).
* Remediate soil contamination in accordance with the SCAP.
* Provide and maintain institutional controls and compliance monitoring as required in the CD.

A copy of the original area-wide CD (Ecology 1994; CD No. 94-2-10917-6), First Comprehensive Amendment to the CD (Ecology 2002) and the Thea Foss Redevelopment CAP (Ecology, 1994) are presented in Appendix A.

Environmental investigations of the Hicks-Bull and Coast Iron Works properties that include Development Sites 8 and 9 were performed in the 1980s and 1990s and an RI was performed in 2001 to evaluate the presence of contamination in soil and groundwater resulting from past filling and industrial activities at the Site. The results of the RI are presented in the report titled Draft Site-Specific Remedial Investigation, Thea Foss Upland Properties, Hicks-Bull, Coast Iron Works, and Steam Plant Properties, Tacoma, Washington (City of Tacoma, 2002). A copy of the RI that includes Development Sites 8 and 9 is provided in Appendix B. The RI identifies contaminant releases at Development Sites 8 and 9 that require cleanup at the Site.

This SCAP has been prepared pursuant to the area-wide CD (Ecology 1994 and 2002; CD No. 94-2-10917-6) and Thea Foss Redevelopment CAP (Ecology, 1994) as well as MTCA (Chapter 70.105D RCW) and associated implementing regulations (Chapter 173-340 WAC).

* 1. Site Description and Current Conditions

Development Sites 8 and 9 are located at 1131 and 1119 Dock Street, respectively, in Tacoma, Washington (Figure 1). The Site is comprised of four Pierce County Parcels that include 8950001961, 8950001962, 8950001963 and 8950001964 (Figure 2). Development Sites 8 and 9 are bounded on the west by Dock Street and the Dock Street right-of-way (ROW), on the north by the Murray Morgan Bridge and the East 11th Street ROW, on the east by the Thea Foss Waterway, and on the south by the proposed Central Waterfront Park property (Figure 2).

Parcel 8950001961 comprises upland area on the southern portion of the Site between Dock Street and the Thea Foss Waterway and is approximately 0.92 acres in size (Figure 2). Parcel 8950001962 comprises upland area on the northern portion of the Site between Dock Street and the Thea Foss Waterway and is approximately 0.81 acres in size. Parcel 8950001963 is approximately 0.45 acres in size and is comprised of upland, shoreline, and marine areas on the northern portion of the Site as well as a 10-foot wide marine area that extends along the waterward side of Parcel 8950001964. Parcel 8950001964 is approximately 0.51 acres in size and is comprised of upland, shoreline and marine property located on the southern portion of the Site.

A survey was performed by Sitts & Hill Engineers, Inc. of Tacoma, Washington in April 2013 to document Site conditions. An emergency interim action was subsequently performed along and adjacent to the shoreline on the northern two parcels (parcels 8950001962 and 8950001963) in January through March (January-March) 2014. The drawing from the 2013 survey is provided in Appendix C. Interim action design drawings identifying modifications to the shoreline performed after the 2013 survey are provided in Appendix D. Figure 3 as well as Figures 4A and 4B present the conditions at the time of the April 2013 survey and identify the approximate area where the interim action was performed at the Site in January-March 2014. Post-construction survey of the interim action area has not been completed to date.

The western portion of Development Sites 8 and 9 are uplands between the Dock Street ROW and the Thea Foss Waterway. The upland portion of the Site is generally flat with elevations ranging from approximately +17 feet Mean Low Low Water (MLLW) at the top of the shoreline slope adjacent to the Thea Foss Waterway to the approximate elevation of +19 feet MLLW adjacent to the Dock Street ROW on the western boundary of the Site (Figure 3). The elevation of the western boundary of the Site is approximately 2 feet lower than the elevation of the adjacent concrete sidewalk that runs along the eastern side of the Dock Street ROW. The upland portion of the Site slopes down from the top of the shoreline (i.e., approximate elevation of +17 feet MLLW) to approximate elevations between -6 and ‑10 feet MLLW in the marine area on the eastern boundary of the Site.

The northern portion of the upland area of the Site (i.e., Development Site 9) is paved with asphalt and is used as a lot for paid parking or reserved parking for the Foss Harbor Marina that is located in the Thea Foss Waterway east of the Site (Figures 2 and 3). Access to the parking lot on the northern portion of the upland area is via two driveways from Dock Street. One driveway is located on the northwest corner of the Site adjacent to the 11th Street ROW and the other driveway is located in the central portion of the Site. Multiple landscape features bounded by concrete curbing are located on the northern portion of the Site in the parking lot area. Additionally, walkway ramps from the upland parking area to the adjacent marina floats are located on the northern and southern portions of Development Site 9.

Multiple utilities are currently present on the northern portion of the Site within the parking lot area that include power, stormwater, sanitary sewer and communications (Figure 4A). Utilities that were present within the interim action excavation area were removed and rerouted/replaced prior to initiation of interim action construction activities. Engineering design plans identifying the utilities that were removed and rerouted/replaced as part of the interim action are presented in Appendix D. Structures associated with the power utilities include below ground lines, junction boxes/vaults, meters and pad-mounted transformers. Structures associated with stormwater utilities include catch basins, manholes and conveyance piping. Structures associated with sanitary sewer utilities include a manhole and conveyance piping. Structures associated with communication utilities include manholes and communication lines. It should be noted that a fiber optic cable has been identified to be present on the northern portion of the Site that passes under the Thea Foss Waterway (City of Tacoma, 2006a). Multiple utilities including power, stormwater, and communications cross the Site between Dock Street and the Thea Foss Waterway shoreline adjacent to the Murray Morgan Bridge and the 11th Street ROW. Utilities also traverse the eastern portion of Development Site 9.

A timber bulkhead previously formed the eastern boundary of the upland area on the northern portion of the Site (i.e., Development Site 9) and a timber esplanade supported by wood piling also extended from the bulkhead over the marine area on Development Site 9 (Figures 2 and 3) prior to implementation of the interim action. The timber bulkhead was installed by the U.S. Army Corps of Engineers (USACE) in the early 1900s (Exeltech, Inc., 2005). The timber bulkhead and esplanade were in poor condition and the potential collapse of the bulkhead was the reason for performing the emergency interim action on the northern portion of the Site in January-March 2014. The timber bulkhead, esplanade and associated timber piling were removed as part of the interim action. The engineering design plans for the emergency interim action are provided in Appendix D.

The shoreline water-ward of the timber esplanade on Development Site 9 underwent remediation as part of the City’s remedial actions for the Thea Foss Waterway. Remedial actions included dredging and capping the shoreline slope water-ward of the face of the timber esplanade to an approximate elevation of -20 feet MLLW in 2004 and 2005. The cap that was placed on the shoreline slope consists of an approximate 18-inch layer of sand and gravel that is armored with an approximate 18‑inch layer of riprap. Additionally, the voids of the riprap armoring were filled with sand and rounded gravel habitat mix to enhance the habitat at the Site. The shoreline slope cap was constructed at an approximate 1.5 foot vertical to 1 foot horizontal (1.5V/1H) slope (City of Tacoma, 2006a). Regular monitoring of the remedial action cap is conducted by the City to ensure that the remedial actions continue to remain protective of human health and the environment (City of Tacoma, 2006b). Remedial actions performed by the City for the Thea Foss Waterway are further described in Section 2.3.4.

As part of the emergency interim action, the shoreline above the slope cap placed as part of the remedial action of the Thea Foss Waterway was excavated to create a 2H/1V slope and then capped. The capping that was completed as part of the emergency interim action was similar to capping completed as part of the remedial action of the Thea Foss Waterway. The cap that was placed on the shoreline slope excavated as part of the interim action also consists of an approximate 18-inch layer of sand and gravel armored with an approximate 18-inch layer of riprap and habitat mix was placed to fill the voids of the riprap armoring. Interim action activities performed by the City in response to the failing bulkhead are further described in Section 4.0.

Two buildings are present on the southern portion of the Site (i.e., Development Site 8) that are approximately 13,600 and 500 square feet in size (Figures 2, 3 and 4B). The larger building previously housed the Coast Iron and Machine Works until the 1980s and then was vacant until the Boy Scouts of America began using the building in the early 1990s to support a Sea Scouts program. The larger building has more recently been identified as the Sea Scouts Building. The Sea Scouts program used the building as a meeting and equipment storage facility until 2012. The larger building is currently vacant. The smaller building appears to have been used for wood working as wood debris (i.e., sawdust, wood chips, etc.) was observed to be present on workbench and floor of the building.

The larger building (i.e., Sea Scouts Building) is constructed of wood and has concrete floors. The interior of the building is generally comprised of two large open spaces with several smaller interior rooms. A survey of potential regulated building materials was conducted on the larger building in April 2013 by Pacific Rim Environmental, Inc. of Seattle, Washington. The purpose of the survey was to provide a preliminary evaluation of the presence and quantity of regulated materials (i.e., asbestos-containing materials, lead-based paint, and universal wastes) present in the building that require mitigation and management prior to and during building demolition. The results of the survey indicated that lead based paint, asbestos-containing material, and universal waste materials (i.e., fluorescent fixtures, ballasts and tubes) are present on/in the larger building. The report presenting the results of the survey is provided in Appendix E.

The second, smaller building located on the southeast corner of larger building (Figures 2, 3 and 4B) is constructed of wood and is currently empty. A survey of potential regulated building materials was also conducted on the smaller building in April 2013 by Pacific Rim Environmental, Inc. The results of the survey indicated that that lead based paint and universal waste materials (i.e., fluorescent fixtures, ballasts and tubes) are present in the smaller building (Appendix E).

The southern portion of the upland area of the Site (i.e., southern portion of Development Site 8) is a combination of gravel/soil and pavement (i.e., asphalt and concrete) and is used for two paid parking areas (Figures 2, 3 and 4B). Access to the parking areas on the southern portion of the upland area is via two driveways from Dock Street. One driveway is located on the southwest corner of the Site adjacent to the proposed Central Waterfront Park property and the other driveway is located in southern portion of the Site. A concrete sidewalk traverses the southern portion of the upland area between the two parking areas that provides public access from the Dock Street ROW to a concrete pile-supported, wood-surfaced esplanade structure constructed over the Thea Foss Waterway on Development Site 8.

The concrete pile-supported esplanade structure present on the southern portion of the Site (i.e., Development Site 8) was constructed in the late 1980s. The upper shoreline slope adjacent to the concrete pile-supported esplanade structure and north of the esplanade is armored with riprap placed over geotextile material. Placement of the geotextile and riprap armoring on the upper shoreline slope was performed in conjunction with construction of the concrete pile-supported esplanade structure (Hart Crowser, 2002).

The lower shoreline slope beneath and water-ward of the esplanade and north of the esplanade on Development Site 8 underwent remediation as part of the City’s remedial actions for the Thea Foss Waterway. Remedial actions included capping the shoreline slope beneath and water-ward of the face of the esplanade on Development Site 8 as well as north and south of the esplanade to an approximate Elevation -20 feet MLLW in 2005. The cap that was placed on the shoreline slope consists of an approximate 18-inch layer of sand and gravel that is armored with approximate 18‑inch layer of riprap. Additionally, the voids of the riprap armoring were filled with sand and rounded gravel habitat mix to enhance the habitat at the Site. The shoreline slope cap was constructed at between an approximate 2V/1H and 1.5V/1H slope (City of Tacoma, 2006a). Regular monitoring of the remedial action cap is conducted by the City to ensure that the remedial actions continue to remain protective of human health and the environment (City of Tacoma, 2006b). Remedial actions performed by the City for the Thea Foss Waterway are further described in Section 2.3.4.

A habitat enhancement feature consisting of a benched area planted with riparian plant species was also constructed south of concrete pile-supported esplanade on Development Site 8 by the City as part of remedial actions for the Thea Foss Waterway (Figure 2). The habitat area was constructed using logs placed horizontally on the surface of the shoreline slope cap at an approximate elevation of +11 feet MLLW. The habitat enhancement area is also monitored by the City.

The area between the west side of the buildings at the Site and the top of the shoreline slope of the Thea Foss Waterway is either soil or concrete pavement (Figures 2, 3 and 4B). Concrete pavement esplanade sidewalk is located along the top of the shoreline slope between northern end of the concrete pile supported esplanade on Development Site 8 and Development Site 9. An approximately 160-foot-long landscaping strip is located in the concrete paved area that contains bushes and relatively mature trees. The remaining portion of the area is soil with grass and brush.

Two monitoring wells (HB-MW02 and HB-MW03) are located on the upland portion of Development Site 8 adjacent to the Thea Foss Waterway. The wells were constructed in March 2001 as a part of the remedial investigation of the Site (City of Tacoma, 2002). The wells are constructed of 2‑inch‑diameter schedule 40 PVC and have 10-foot well screens. Based on measurements taken in April 2013 the total depths and depths to groundwater, respectively, in the monitoring wells are the following:

* HB-MW02 – 14.59 feet bgs and 8.80 feet bgs; and
* HB-MW03 - 14.24 feet bgs and 8.54 feet bgs.

Monitoring well HB-MW01 was decommissioned prior to initiation of the emergency interim action as the well was located in the interim action excavation area (Figure 3).

* 1. Description of Adjacent Sites
		1. Dock Street ROW

Remedial actions were completed in 2008 within the Dock Street ROW from East 15th Street to 470 feet north of East 11th Street. The remedial actions conducted within the Dock Street ROW were completed pursuant to a CD with Ecology (CD No. 94-10917-6) (City of Tacoma, 2005). The remedial actions included upgrades to infrastructure within and resurfacing of the Dock Street ROW.

An investigation of the Dock Street ROW was performed prior to the remedial actions and upgrades in the Dock Street ROW (City of Tacoma, 2001). Contaminants were identified to be present at concentrations greater than MTCA cleanup levels in soil and groundwater. Contaminants detected at concentrations greater than MTCA cleanup levels in soil included carcinogenic polycyclic aromatic hydrocarbons (cPAHs) and arsenic. Contaminants detected at concentrations greater than MTCA cleanup levels in groundwater include benzene and arsenic.

Upgrades to the infrastructure within the Dock Street ROW consisted of replacing utilities including stormwater, sanitary sewer and water lines. Remedial actions included placing all utilities in a combined utility trench that was lined with geotextile and backfilled with clean bedding material or overexcavating the utility corridor 1 foot and then backfilling with clean bedding material. The Dock Street ROW was also upgraded by resurfacing the street with asphalt and constructing concrete curbs and gutters, sidewalks, and driveway entry pans. The asphalt and concrete surfaces comprise a remedial action cap to physically isolate residual contaminants in soil and to limit infiltration of precipitation within the ROW. Additionally, the surface grade was raised and sloped toward the west to promote surface water flow away from the Thea Foss Waterway and into the reconstructed stormwater system. All unsuitable soil materials that were encountered during construction were transported to an off-site disposal facility (City of Tacoma, 2001).

* + 1. 11th Street ROW

A remedial investigation within the 11th Street ROW was conducted by Hart Crowser in 1998. Three soil borings were advanced to 20 feet bgs, two test pits were excavated to depths of between 5 and 6.5 feet bgs, and one monitoring well was installed to a depth of approximately 15 feet bgs beneath the west side of the Murray Morgan Bridge between Dock Street and the Thea Foss Waterway.

Samples collected as part of the remedial investigation in 1998 were analyzed for total metals, toxicity characteristic leaching procedure (TCLP) metals, semi-volatile organic compounds (SVOCs), volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), pesticides, and total petroleum hydrocarbons (TPH). One sample, (11ROW-L1) collected as part of the investigation contained lead at a concentration of 4,680 milligrams per kilogram (mg/kg). A TCLP lead analysis on the sample indicated that there is a potential for the presence of characteristic Dangerous Waste at the Site. Additionally, total PCBs, total cPAHs and TPH as heavy oil were detected in fill within the 11th Street ROW at concentrations above screening levels. These contaminant concentrations are likely related to cutting oils and other lubricants that may be present in machined metal observed within the ROW. A groundwater sample collected from R11-MW01 within the 11th Street ROW had detections of dissolved metals exceeding the CD cleanup levels (City of Tacoma, 2002).

Construction activities have recently been completed to restore and upgrade the Murray Morgan Bridge structure. Additionally, utility upgrades were performed in the 11th Street ROW beneath the bridge between Dock Street and the Thea Foss Waterway as part of the project including stormwater infrastructure (i.e., an oil/water separator vault) to treat and convey stormwater from the west side of the bridge deck. Stormwater from the west side of the bridge deck is conveyed to the Thea Foss Waterway through stormwater outfall 6000403 located in the northeast corner of the Site (City of Tacoma, 2013).

* + 1. 1147 Dock Street Property

The property south of the Site is currently vacant and was recently purchased by the FWDA for the proposed Central Waterfront Park. The northern portion of the 0.7-acre property was previously the location of a steam plant from the 1920s to the 1980s and a warehouse was previously located on the southern portion of the property. The steam plant was demolished in the mid-1980s and the warehouse was demolished by the end of the 1970s. The property has remained unused except for parking since the mid-1980s.

Two 35,000 gallon underground storage tanks (USTs) used for Bunker-C fuel storage were removed in October 1992 from the central portion of the property along with approximately 120 cubic yards of associated petroleum-contaminated soil (Investco Financial Corporation, 1993). In December 1992, additional remedial excavation occurred in the area of the USTs where exceedances of petroleum hydrocarbons and PAHs remained in a sidewall and the base of the previous excavation. The additional remedial excavation removed approximately 20 cubic yards of petroleum hydrocarbon-contaminated soil. Petroleum hydrocarbons were either not detected or were detected at concentrations less than the current MTCA Method A cleanup level in confirmation soil samples collected as part of the additional remedial excavation. Five additional borings were installed in 1994 to further assess petroleum hydrocarbon contamination on the property. Petroleum hydrocarbons were either not detected or detected at concentrations less than the current MTCA Method A cleanup levels for petroleum hydrocarbons in the samples collected from the soil borings (Looney, 2007).

An Ecology-lead interim remedial excavation of approximately 1,000 tons of mercury-contaminated fill soil was completed on the northern shoreline of the property in 1998. The source of the mercury was reportedly fill materials consisting of consolidated ash and boiler waste. Other contaminants detected in the soil at concentrations greater than MTCA Method A cleanup levels or sediment at concentrations greater than sediment quality objectives (SQOs) on the northern portion of the shoreline included petroleum hydrocarbons, lead, zinc, and cPAHs. Confirmation soil samples were collected from the base and sidewalls of the remedial excavation. Mercury, cPAHs and lead were detected above the MTCA Method A cleanup levels and the SQOs in the samples. A geotextile barrier and several feet of crushed rock armoring were placed in the excavation as a cap in 1998 to prevent contaminant migration from the upland to the Waterway. As part of the remedial action in the Thea Foss Waterway in 2005, additional capping materials consisting of gravel and sand were placed over the previous cap to enhance shoreline marine habitat (Looney, 2007).

Approximately 46 cubic yards of mercury-contaminated soil was also excavated from two locations on the Site in 2005. Confirmation soil samples were collected from the base and sidewalls of each excavation for mercury analysis. Mercury was either not detected or was detected at concentrations less than the current MTCA Method A cleanup level in the confirmation soil samples collected from the two excavations (Looney, 2007).

Ecology entered into an Agreed Order (#DE 3373) in 2007 with a former property owner, Federal Asset Recovery. Ecology granted a No Further Action (NFA) in 2007 for soil and groundwater on the Site based on the results of previous investigations and remedial actions. Additionally, a restrictive covenant was established for the shoreline portion of the property that was capped in 2006 as part of remediation of the Foss Waterway (Ecology, 2007).

* + 1. Thea Foss Waterway

As stated in Section 2.1, Development Sites 8 and 9 and the Thea Foss Waterway lie within the larger Commencement Bay Nearshore/Tideflats (CB/NT) Superfund Site. In 1994, the City voluntarily entered into an AOC with the EPA for investigation and remedial design of the portion of the Thea Foss Waterway from the "Mouth" of the Waterway to near the 21st Street Bridge (EPA, 1994). Remedial actions were subsequently performed under a CD between the City and EPA (EPA, 2003). Remedial actions performed under the AOC and CD with EPA are applicable to the portion of the waterway at and below (i.e., water-ward) the MHHW line (EPA, 1994).

Remediation of sediment within the Thea Foss Waterway was completed in 2006. The remedial actions performed by the City are described in the Thea Foss and Wheeler-Osgood Remediation Project Remedial Action Construction Report (City of Tacoma, 2006a). The remedial actions performed in the Thea Foss Waterway are periodically monitored by the City to ensure that the remedial actions are continuing to be protective of the human health and the environment. Monitoring of the remedial actions is being performed under an Operations, Maintenance, and Monitoring Plan (OMMP) prepared for the Site (City of Tacoma, 2006b). The results of the periodic monitoring are documented in a report that is prepared upon completion of each monitoring event.

Under the AOC and CD, the City completed remedial design and remediation of sediment along the shoreline of Development Sites 8 and 9 and adjacent to Development Sites 8 and 9 within the Thea Foss Waterway. The portion of Development Sites 8 and 9 included in remedial actions for the Thea Foss Waterway are within a portion of the remediation area designated Remedial Area 8 (RA 8). The portion of the Thea Foss Waterway remediated by the City encompassed sediment water-ward of the MHHW line at Development Sites 8 and 9 but also extended above the MHHW line to the top of the shoreline slope south of the esplanade on Development Site 8 where a habitat enhancement area was constructed on the shoreline slope (Figure 2). The remedial actions performed at Development Sites 8 and 9 included dredging and/or capping the shoreline as well as placement of habitat mix on the shoreline surface (see Section 2.2).

The remedial actions performed as part of the Thea Foss and Wheeler-Osgood Waterway Remediation Project were/are subject to monitoring in 2006, 2008, 2010, 2013 and 2016 as part of the OMMP prepared for the Site (City of Tacoma, 2006b).  Monitoring activities include evaluation of the physical integrity of the cap that includes cap inspections and hydrographic survey and evaluation of sediment quality that includes sediment sampling and analysis. The report prepared for monitoring performed in 2010, the most recent year for which a monitoring report was available, identified that the slope cap at Development Sites 8 and 9 was intact based on slope cap integrity monitoring and that chemical concentrations in the sediment samples were less than the cleanup levels (City of Tacoma, 2010).

* 1. Historical Land Use

The historical land use at the Site presented in this section is a summary of the information provided in the RI (City of Tacoma, 2002). A more detailed presentation of the historical land use is presented in the RI that is included as Appendix B. Figure 2, from the RI is reproduced in this SCAP as Figure 5 for reference in the discussion presented below.

Prior to Euroamerican settlement, the Tacoma waterfront and area encompassing the Port of Tacoma were tidelands of the Puyallup River Delta with steep bluffs on the west and east sides of the delta and the Puyallup River valley to the south. The Site is located on the west side of the Puyallup River Delta at the base of a bluff below what is now Downtown Tacoma.

Initially, railroad lines were developed along the base of the bluff west of the present day location of the Site. Beginning in the 1890s through the early 1900s, the tidelands were filled under the ownership of the Tacoma Land Company, a subsidiary of the Northern Pacific Railroad Company with material dredged from the current Thea Foss Waterway along with material removed from the adjacent bluff. The present day alignment of the Thea Foss Waterway was finished in 1905. The parcels south of 11th Street remained relatively undeveloped until 1910 when Northern Pacific Railway transferred the properties to the City of Tacoma. The City began leasing the property to various industries that primarily consisted of machine and metal working shops (Figure 5). A summary of historical land use at the Site includes the following:

* The Hicks-Bull Machine Shop resided on Lots 1 through 3 (Figure 5) comprising the northern portion of the Site between the 1910s and 1937. Dravis Engineering and Machine Works, who bought Hicks-Bull, operated in a similar area from 1937 to 1963 then transferred the facilities to Atlas Foundry who used the buildings that were present on the property at that time for storage. In 1978, the City leased the lots to Moorage Associates (Totem Boat Haven).
* Tacoma Welding Company, Coast Iron and Machine Works, multiple fish and seafood packers, and an auto repair business operated on Lots 3 through 5 from approximately 1914 to 1975. Tacoma Welding Company operated in a building located on Lot 4 adjacent to Dock Street from approximately 1914 to the mid-1930s. An auto repair business subsequently operated in the building for approximately 10 years until 1946. Coast Iron and Machine Works operated in a building on Lot 5 starting in approximately 1914 but later relocated the operations to Lots 7 and 8. The Tacoma Fish Packing Company, Marush Fish and Oyster Company, and Johnny’s Seafood operated from buildings on Lots 3 through 5 sometime between approximately 1920 and 1975.
* A steam boiler works and welding facility operated on Lot 6 and a portion of Lot 7 from approximately 1920 to 1955. The boiler works and welding company name changed multiple times during that period (i.e., Tacoma Steam Boiler Works, Tacoma Steam Boiler and Welding Works, etc.).
* Coast Iron and Machine Works occupied a building on Lots 7 and 8 from the early 1930s to the 1980s. The building was most recently used by the Boy Scouts of America for the Sea Scouts program.
* The Pacific Machine Shop occupied Lot 9 from approximately 1918 through 1986. The machine shop building was demolished in 1990.
* The Ryan Fruit Company warehouse is indicated to have operated on the southern portion of Lot 9 and Lots 10 and 11 starting in the 1920s. The William Brothers was identified to have succeeded the Ryan Fruit Company and also performed warehousing but in the late 1940s operated a maintenance garage. In approximately 1966, the Western Fish and Oyster Company operated a retail store built primarily on Lot 10 and the southern portion of Lot 9. Lot 11 was used for parking. The Western Fish and Oyster Company building was demolished in 1990.
* The City established the Tacoma Steam Plant No. 1 on Lots 11 and 12 in 1922. This electrical plant was built as a backup system and was reportedly rarely operated. The plant was demolished by the City in 1985.
1. Summary of Site characterization Results

Characterization of Site media was performed as part of multiple investigations completed between 1980 and 2001. Various investigations were performed to evaluate specific areas of the Site and specific media between 1980 and 1998. In 2001, an RI was performed to characterize the nature and extent of impacts to soil and groundwater on the Site. The RI report prepared for the Site (City of Tacoma, 2002) (Appendix B) describes each of the investigations.

The specific objectives of the RI included the following:

* Evaluate fill and soil quality at the Site;
* Evaluate groundwater quality entering the Thea Foss Waterway;
* Identify the vertical and lateral extent of slag and other waste material; and
* Identify potential sources of contamination to soil and groundwater.

This section presents a summary of the characterization results for Site soil and groundwater based on the results presented in the RI (City of Tacoma, 2002). For a detailed description of the results, refer to the RI presented in Appendix B.

The results of characterization of sediment at the Site is not presented in this SCAP as sediment at the Site has been remediated as part of the Thea Foss and Wheeler-Osgood Waterways Remediation Project and was completed in 2006. As described above in Sections 2.1 and 2.3.4, the remedial actions for sediment at the Site were performed under an AOC and CD between EPA and the City (City of Tacoma, 2006a). Monitoring of the sediment remedial actions is being performed by the City to ensure that the remedial actions continue to be protective of human health and the environment (City of Tacoma, 2006b).

* 1. Fill and Soil Characteristics and Quality

As part of the RI, 10 test pits were excavated to depths up to 10 feet and five soil borings advanced to approximately 17 feet. Thirty-three soil samples were collected and analyzed for metals, diesel- and oil-range petroleum hydrocarbons, and PAHs. One soil sample was analyzed for benzene, ethylbenzene, toluene and xylenes (BETX). The following is a summary of the fill and soil characteristics and stratigraphy presented in the RI (Appendix B).

The results of the Site investigation identified that fill is present overlying native tide-flat deposits comprised of sand containing shells. Based on the results of the RI, the fill ranges from approximately 1 to 12 feet thick and is comprised of a mix of debris and dredged sediment. Debris observed to be present in the fill includes brick, asphalt, concrete, wood, creosote treated wood, burnt wood, coal, slag, ash and cinders. Material interpreted to be dredged fill is comprised of sand with occasional shells. Additionally, creosote-treated piling that likely supported a previous structure were observed to be present at an investigation location on the southern portion of the Site. The fill containing debris was observed to be thickest along the shoreline on the eastern portion of the Site and was not observed in borings advanced in the Dock Street ROW. Figures 8 and 9 from the RI that present cross sections based on observations during the remedial investigation of the Site are reproduced in this SCAP as Figures 6A and 6B.

The results from the remedial investigation identified that metals including arsenic and lead, cPAHs, and oil-range petroleum hydrocarbons were present in fill and soil at concentrations greater than soil cleanup levels. The sample locations where contaminant concentrations were detected in fill and soil greater than cleanup levels as part of the remedial investigation of the Site are shown on Figures 7A and 7B and include the following:

* Total cPAHs were detected at concentrations exceeding soil cleanup levels in fill materials present throughout much of the Site. Total cPAHs concentrations exceeding soil cleanup levels were predominantly detected in fill material containing a mix of debris.
* Lead and arsenic were detected at concentrations exceeding soil cleanup levels predominantly in the central portion of the Site. The highest concentration of lead (i.e., 2,630 mg/kg) and the only detection of arsenic at a concentration greater than the soil cleanup level (i.e., 77.2 mg/kg) was in a sample collected from 3 to 5 feet bgs at test pit location HB-TP05 completed east of the Sea Scouts building on Development Site 8, which was previously used by Coast Iron and Machine Works and by the Tacoma Steam Boiler Works. Lead was also detected at a concentration exceeding soil cleanup levels (i.e., 252 mg/kg) in a sample collected from 1 to 2 feet bgs at test pit location HB-TP10 in the southwest corner of the Site where the former Tacoma Steam Plant resided. The sample was collected of fill consisting of tan ash material.
* Oil-range petroleum hydrocarbons were detected at a concentration exceeding the soil cleanup level (i.e., 4,000 mg/kg) in a sample collected at test pit location HB-TP01 in the northeast corner of the Site. The sample was collected from the surface to 1-foot bgs.
	1. Groundwater Characteristics and Quality

Groundwater characteristics and quality were evaluated using four monitoring wells present at the Site. Three of the monitoring wells (i.e., HB-MW01 through HB-MW03) were installed as part of the remedial investigation of the Site. Groundwater characteristics and quality were also evaluated using one previously existing monitoring well (i.e., RD3-UMW2A) at the Site. Eleven groundwater samples were collected from the four monitoring wells and analyzed for a combination of: dissolved metals; gasoline-, diesel-, and oil-range petroleum hydrocarbons; PAHs; and BETX. The following is a summary of the groundwater characteristics and quality presented in the RI (Appendix B).

Water level measurements were collected from the four monitoring wells present at the Site during high and low tides and a tidal monitoring study was performed using monitoring well RD3-UMW2A. Based on the water level measurements and tidal study, the minimum groundwater depth at the Site was estimated to be approximately 7 feet bgs and the average depth to groundwater was estimated to be approximately 9 feet bgs. Additionally, the net groundwater flow across the site was identified to be toward the Thea Foss Waterway, with short-term flow reversals that likely occur during high tides.

Groundwater samples collected during the remedial investigation identified that dissolved arsenic, copper, and nickel concentrations were greater than groundwater cleanup levels. Dissolved arsenic and copper detections were attributed to the high salinity of the groundwater and were in the general range of concentrations detected at other upland parcels adjacent to the Thea Foss Waterway with similarly high salinity groundwater. A reference sample of surface water collected at Owen Beach at Point Defiance Park, North Tacoma had dissolved arsenic and copper concentrations higher than the samples collected at the Site indicating that the dissolved arsenic and copper concentrations detected in Site groundwater were partly attributable to the salinity in the groundwater.

Dissolved nickel was detected at concentrations ranging from 25.8 micrograms per liter (µg/L) to 47 µg/L in groundwater collected from monitoring well HB-MW02. The reference sample collected from Owen Beach had a dissolved nickel concentration of 10.8 µg/L. The results for dissolved nickel in the reference sample collected from Owen Beach was consistent with results of other samples collected from the Site. Therefore, groundwater in the vicinity of monitoring well HB MW02 was identified to be the only location where groundwater was impacted by the Site. The highest concentrations of nickel in soil were observed in three test pits (i.e., HB-TP05, HB-TP06 and HB‑TP07) nearest to monitoring well HB-MW02 (Table B-3 in Appendix B) indicating that soil in this area is most likely a source of nickel in groundwater and contributing to nickel in groundwater at concentrations greater than the cleanup level.

* 1. Summary of Site Contaminants and Conditions

Based on the remedial investigation, metals (i.e., arsenic, copper, lead and nickel), cPAHs and petroleum hydrocarbons are present at concentrations greater than cleanup levels at the Site. Contaminants present in Site soil exceeding cleanup levels include arsenic and lead, total cPAHs, and petroleum hydrocarbons. Metals including arsenic, copper, and nickel were detected in groundwater at concentrations exceeding cleanup levels. However, only nickel appears to be present in groundwater at a concentration exceeding the cleanup level as a result of sources in Site soil.

Site contaminants at concentrations greater than cleanup levels are predominantly detected in fill materials containing various debris (Figures 6A, 6B, 7A and 7B). Total cPAHs were detected at concentrations exceeding soil cleanup levels in fill materials present throughout much of the Site. Metals and petroleum hydrocarbons were also detected in fill material containing debris but were generally detected in localized areas.

Dissolved nickel was detected in groundwater at monitoring well HB-MW02 at concentrations ranging from 25.8 µg/L to 47 µg/L (Figure 7B) and greater than a reference sample collected from Owen Beach (i.e., 10.8 µg/L). The highest concentrations of nickel in soil were observed in three test pits (i.e., HB-TP05, HB-TP06 and HB-TP07) nearest to monitoring well HB-MW02 indicating that soil in this area is most likely a source of nickel in groundwater and contributing to nickel in groundwater at concentrations greater than the cleanup level.

The site-specific RI states that “… the site meets the intent of the Consent Decree Cleanup Action Plan with expected contaminant types, land use history, and analyte concentrations”. The site-specific RI also states that “The CAP [i.e., Thea Foss Redevelopment CAP] identifies Alternative 3 Remediation of Soils Based on Future Land Use Development as the appropriate alternative for site cleanup all along the Thea Foss waterfront based on the an Area-Wide Feasibility Study” (City of Tacoma 2002). Therefore, based on the results of the RI, the cleanup action requirements of the Thea Foss Redevelopment CAP will be implemented as part of the redevelopment of Development Sites 8 and 9.

1. Emergency Interim Action

This section presents a summary of the tasks performed to implement an emergency interim action at Development Site 9. For a more detailed description of components of the interim action, refer to the interim action documentation provided in Appendix D.

An emergency interim action was performed by the City in January-March 2014 to remedy a failing bulkhead on the shoreline of Development Site 9. The emergency interim action included excavation and off-site disposal of soil and sediment present adjacent to the failing bulkhead, removing the bulkhead and adjacent wooden esplanade and capping of the excavated shoreline slope. Tasks performed to complete the emergency interim action included the following:

* Engineering design and permitting;
* Removing, rerouting and replacing utilities that were in the interim action excavation area;
* Characterizing soil and sediment for off-site disposal;
* Excavation of soil from behind the bulkhead to create a 2H/1V slope;
* Excavation of sediment water-ward of the bulkhead down to the existing slope cap;
* Removal of the bulkhead and wooden esplanade; and
* Capping of the shoreline slope.

Engineering design was performed to develop the project plans used to implement the interim action as well as provide the basis for permitting the interim action. Permitting included preparation and submittal of a Joint Aquatic Resources Permit Application (JARPA), State Environmental Policy Act (SEPA) checklist and Biological Evaluation. Project permits and approvals included a Corps of Engineers Nationwide Permit 3, Hydraulic Project Approval and SEPA Determination of Non-significance (DNS). Additionally, a Notification of Intent to Proceed with the Site 9 Emergency Interim Action was submitted by the City to Ecology upon receipt of project permits and approvals. The engineering design plans, permitting submittals and project permits and approvals prepared to perform the interim action are provided in Appendix D. Additionally, photographs of the failing bulkhead prior to the emergency interim action are provided in the JARPA (Appendix D).

Utilities present within the interim action area were removed prior to initiation of interim action excavation activities. Utilities were relocated and replaced west of the interim action excavation area (see engineering design plans in Appendix D). Soil excavated as part of utilities replacement was characterized and disposed of offsite. Three samples of the stockpiled soil were analyzed for a combination of total metals, TCLP lead, PAHs, polychlorinated biphenyls (PCBs) and gasoline-, diesel-‑ and oil-range petroleum hydrocarbons. Additionally, a fish bioassay test was performed on one sample in accordance with Ecology Publication 80-12. Based on the stockpile sample results, the soil was disposed of at the LRI Subtitle D landfill under a Waste Disposal Authorization (WDA) from the Tacoma Pierce County Health Department (TPCHD) (see utility excavation WDA in Appendix D). Approximately 125 tons of soil excavated to install utilities was disposed of at the LRI landfill (Appendix D).

During utility replacement activities, a buried tank was encountered west of the interim action excavation area on the northeast portion of Development Site 9. The tank was approximately 4-feet long and 2-feet in diameter and constructed of steel. The tank was filled with sand indicating that it had previously been closed in place. The buried tank was left in-place at the Site. Ground penetrating radar (GPR) was performed within the upland portion of the interim action excavation area to evaluate the potential presence of additional buried tanks. A report was prepared that identified the location of the tank encountered on the northeastern portion of Development Site 9 as well as a location on the southeastern portion of Develop Site 9 where there was a question as to whether an additional tank was present (see buried tank information in Appendix D). The second location was determined to be a buried concrete slab with a void space present beneath it during the interim action excavation activities (Appendix D).

Also removed from the interim action area prior to initiation of excavation was monitoring well HB‑MW01. Monitoring well HB-MW01 was decommissioned by a licensed driller (see well decommissioning report in Appendix D).

Soil and sediment sampling and analysis was performed to pre-characterize the soil and sediment to be excavated from the interim action area for off-site disposal. Soil borings were advanced at 11 locations. Soil samples were collected from at or near the Site surface to depths up to 10 feet bgs. Sediment samples were collected from seven locations from near the sediment surface to depths up to 30 inches. The soil and sediment samples from the interim action excavation area were analyzed for a combination of total metals, TCLP metals, PAHs and diesel- and oil-range petroleum hydrocarbons. cPAHs were detected in soil samples collected from the interim action excavation area at concentrations greater than the soil cleanup level. Additionally, lead was detected in several soil samples at concentrations greater than the soil cleanup level. One sample was also collected from a two to 6-inch thick “oil mat” that was present in the upland portion of the interim action area. The oil-range petroleum hydrocarbon concentration in the sample (7,000 mg/kg) was also greater than the cleanup level. Samples collected of sediment located within the interim action excavation area contained cPAHs and lead at concentrations similar to soil. Based on the pre-characterization sample results, the soil and sediment was approved for disposal at the LRI Subtitle D landfill under a WDA from the TPCHD (see interim action soil and sediment pre-characterization and WDA in Appendix D).

Excavation of sediment in front of the bulkhead as well as soil behind the bulkhead was performed to create an approximate 2H/1V slope from the top existing slope cap installed as part of remediation of the Thea Foss Waterway to the top of the shoreline slope in the interim action area. Excavation was performed in 25 to 50 foot wide swaths starting from the south end of the interim action area and proceeding to the north. Soil and sediment excavation was performed during low tides so that the excavation was performed in the dry (i.e., when the soil and sediment were not covered by water). A containment boom was also deployed to encompass the interim action area during construction activities. Capping of the shoreline slope with slope cap filter material (i.e., mix of sand and gravel) was performed upon completion of excavation of each swath. The portion of the bulkhead and esplanade present in each swath was also removed. All of the material (i.e., soil, sediment, bulkhead, and esplanade) that was removed was transferred to the upland and disposed of off site at the LRI landfill. Approximately 4,085 tons of contaminated soil and sediment excavated as part of the emergency interim action were disposed of at the LRI landfill (Appendix D).

The excavated slope was capped with an approximate 18-inch layer of slope cap filter material comprised of sand and gravel and armored with an approximate 18-inch layer of riprap. Habitat mix was placed to fill the voids of the riprap armoring. Approximately 3,500 tons of slope cap filter material, rip rap and habitat mix were placed to complete the cap. Additionally, 15 root wads were anchored to the slope at an approximate elevation of +10 feet MLLW to enhance the habitat at the Site. Physical and chemical testing was performed on the capping material prior to use at Development Site 9. Chemical testing included analysis for total metals, semi-volatile organic compounds, PCBs and pesticides (see capping material testing results in Appendix D).

1. Cleanup Action Requirements
	1. Thea Foss Redevelopment Cleanup Action Plan

The Thea Foss Redevelopment CAP included in the CD for remediation of City-owned upland properties adjacent to the Thea Foss Waterway, consistent with MTCA, requires that remedial actions be performed to protect human health and the environment, comply with cleanup standards and other applicable or relevant and appropriate requirements (ARARs), as well as provide for compliance monitoring. Additionally, the Thea Foss Redevelopment CAP, the CD and MTCA specify that remedial actions should recognize land use planning and the ultimate use of the Site.

The feasibility study process for the City-owned properties evaluated multiple remedial alternatives to address potential risks to human health and the environment from soil contamination present at the City-owned upland properties including Development Sites 8 and 9. Based on comparative analysis, the alternative selected by Ecology specified in the Thea Foss Redevelopment CAP is Remediation Based on Future Land Use Development (identified as Alternative 3 in the CAP) (Ecology, 1994). The Thea Foss Redevelopment CAP identified three land use scenarios and specific remedial actions that are to be performed based on the land use scenario. The land use scenarios identified in the CAP include the following:

* Scenario 1: Proposed redevelopment with ground floor residential use;
* Scenario 2: Proposed redevelopment for commercial/retail, open space, or upper story residential uses; and
* Scenario 3: Proposed industrial use for properties located on the east side of the Thea Foss Waterway.

The Thea Foss Redevelopment CAP also identified cleanup levels for soil and groundwater at the City-owned upland properties that are protective of human health and the environment and in consideration of Site use.

As specified in the CAP, the site-specific cleanup levels and required remedial actions to be performed at Development Sites 8 and 9 are based on the land use and the proposed redevelopment to occur at the Site. Redevelopment at Development Sites 8 and 9 will include Scenario 1 and/or Scenario 2 land use. The following sections identify the land use and conceptual redevelopment for Development Sites 8 and 9 and the site-specific cleanup levels and summarize the remedial actions specified in the Thea Foss Redevelopment CAP.

* 1. Land Use and Proposed Redevelopment Plan

Development Sites 8 and 9 are located within an area that is zoned S-8, Shoreline District – Thea Foss Waterway under City of Tacoma Municipal Code Chapter 13.10 (City of Tacoma, 2003). The intent of the “S-8” Shoreline District is to improve the environmental quality of Thea Foss Waterway and provide continuous public access to the waterway as well as encourage the reuse and redevelopment of the area for the following (City of Tacoma, 2003):

* Mixed-use, pedestrian oriented development;
* Residential development;
* Marinas, related facilities, and waterborne transportation;
* Water-oriented commercial uses and maritime activities; and
* Water-oriented public parks and public facilities.

Proposed redevelopment plans for Development Sites 8 and 9 are consistent with the intent of the S-8 Shoreline District zoning as well as the Master Redevelopment Strategy for the Thea Foss Waterway (FWDA, 2012). Redevelopment is anticipated to consist of mixed use including a combination of the following:

* Construction of a multi-story building or buildings with commercial development or residential use on the ground floor and residential use on the upper floors.
* Construction of the multi-story building or buildings on the existing Site surface or with below grade structures including below grade parking.
* Public access to the Thea Foss Waterway as well as access to the Foss Harbor Marina.
* Public open space and/or park area.

The actual extent of each general type of land use identified above (i.e., commercial, residential, public access and a public park) will be determined based on the market conditions at the time of redevelopment. The actual redevelopment that is constructed will be based on the design prepared by a developer of the Site.

Redevelopment will require excavation for construction that may include a building or buildings and associated infrastructure including foundations, below ground parking, installation of utilities, as well as replacement of structures that support public access at the Site. Where redevelopment consists of residential use on the ground floor, all fill and soil is required to be excavated to the mean-high groundwater level as specified in the Thea Foss Redevelopment CAP.

Areas around and beneath the building or buildings would include asphalt/concrete pavement for walkways and vehicle access and parking. Areas around the building or buildings would also include landscaping and open spaces (i.e., lawn area). A park could also be developed to provide a larger open space for the public.

* Replacement of structures that provide public access to the waterway and public open space will be part of Site redevelopment. The esplanade structure on Development Site 8 will be maintained and access to the esplanade on Development Site 8 and between the esplanades on Development Sites 8 and 9 will be integrated into redevelopment for the Site. Plans have been prepared for replacement of the esplanade structure on Development Site 9. The plans include installing a new concrete pile supported and surfaced esplanade adjacent to and over the new shoreline slope created as part of the emergency interim action.

The current plans for the replacement esplanade on Development Site 9 are provided in Appendix F.

The Site is currently used to provide access to the Foss Harbor Marina. Access to Foss Harbor Marina floats is currently provided by two walkways located at the north and south ends of Development Site 9 that connects the upland to the marina floats and facilities. Walkways will be maintained and/or reconstructed to continue to provide access to the Foss Harbor Marina as part of redevelopment and Site use.

The land use and redevelopment described above provide the basis for the site-specific cleanup levels and the remedial actions required to be performed at Development Sites 8 and 9 under the Thea Foss Redevelopment CAP.

* 1. Site Cleanup Standards

The Thea Foss Redevelopment CAP specifies site-specific cleanup standards based on the requirements of MTCA (Chapter 173-340 WAC) and the proposed Site redevelopment. Additionally, the CAP identified maximum contaminant concentrations for soil. Table 1 presents the cleanup standards for soil and groundwater for individual constituents identified in the CAP as well as the individual maximum contaminant concentrations for soil that are applicable to Development Sites 8 and 9 based on the land use and proposed redevelopment. The cleanup standards presented in this SCAP have been updated from the cleanup levels presented in Thea Foss Redevelopment CAP based on updates to the cleanup levels in MTCA as well as other applicable state and federal criteria (Table 1). The following sections further describe the cleanup levels for soil and groundwater.

* + 1. Soil Cleanup Standards

The cleanup standards for the Site soils are based on protection of groundwater and surface water, and on estimates of reasonable maximum exposure expected for protection of human health based on Site use. The residential use scenario as defined in MTCA represents the reasonable maximum exposure scenario for direct contact at Development Sites 8 and 9 because of the proposed redevelopment for residential use. The cleanup standards for residential use are the MTCA Method B cleanup levels. For contaminants for which Method B cleanup levels are not established, the MTCA Method A cleanup levels for unrestricted land use are used.

The CAP identified maximum soil concentrations that were characterized as the upper limit for site-wide contaminant concentrations for which the remedial technologies specified in the CAP are applicable (Table 1). The CAP identified that there were upland Sites adjacent to the Thea Foss Waterway where materials including slag are present in soil that may contain contaminants greater than the maximum soil concentrations identified in the CAP but also identified that the materials could be readily removed from soil at the Sites. Therefore, the CAP identified that the presence of the material doesn’t exclude a Site from applicability under the CAP (Ecology, 1994).

* + 1. Groundwater Cleanup Standards

The cleanup standards for Site groundwater are based on protection of marine surface water including protection of aquatic life (i.e., marine chronic criteria specified in Chapter 173‑201A WAC and 40 CFR 131) and the protection of human health from consumption of aquatic organisms (40 CFR 131) (Table 1). Protection of surface water is applicable for Site groundwater since groundwater at the Site was determined to be non-potable as specified in the Thea Foss Redevelopment CAP (Ecology, 1994).

Consistent with MTCA (WAC 173-140-720), shallow groundwater at Development Sites 8 and 9 is not considered a potable water source as shallow groundwater from the Site is not currently being used for potable water and is not suitable as a future potable water source due to the high potential for saline water intrusion as a result of groundwater extraction. It is also unlikely that a contaminant in the shallow groundwater will be transported to an area where groundwater is a current or potential future source of potable water (Ecology, 1994).

* 1. Remedial Actions for the Proposed Redevelopment and Site Use

Remedial actions required under the Thea Foss Redevelopment CAP for the proposed redevelopment and Site use at Development Sites 8 and 9 include the following:

* Remediation of excavated soil;
* Isolation of contaminants below soil and pavement caps;
* Over-excavation or lining of the excavation area with geotextile and backfilling with clean soil in areas where repeated excavation may occur;
* Establishment of institutional controls where residual contamination remains on site; and
* Compliance monitoring.

The following sections further describe each of the remedial actions required for the Site.

* + 1. Remediation of Excavated Soil

Remediation is required for all contaminated soil removed from excavations performed at the Site. Treatment of excavated contaminated soil is preferred, whenever practicable, but actual treatment process options are dependent on the contaminant characteristics and type of excavated material. Soil that is treated and reused on site must meet cleanup levels presented in Table 1.

The results of the remedial investigation indicate that fill and soil is present at the Site that contains cPAHs, metals and petroleum hydrocarbons at concentrations greater than the cleanup levels. Additionally, fill/soil is present with lead concentrations greater than the maximum soil contaminant concentration and fill/soil is present that is a source contributing to nickel in groundwater at concentrations greater than the groundwater cleanup standards that must be excavated to meet the requirements of the Thea Foss Redevelopment CAP. Fill and soil excavated from the Site containing contaminant concentrations greater than the maximum soil concentrations and/or cleanup levels and/or contributing to concentrations in groundwater greater than the groundwater cleanup levels will require treatment based on its chemical characteristics and type. Alternatively, excavated material that is not practical to treat may be disposed of offsite at an appropriate disposal facility.

* + 1. Isolation Beneath Soil or Pavement Caps

Where residential use is not proposed for the ground floor, caps consisting of soil or pavement are required to isolate contaminants left on site and to prevent exposure.

A cap comprised of soil constructed to isolate contaminated soil present at the Site must consist of 3 feet of clean soil cover. Remedial actions could include excavating and treating up to 3 feet of soil to meet MTCA Method B standards followed by reuse as backfill.

Pavement comprised of asphalt or concrete can be used for isolating contaminated soil to be left on site. A building or structure can also be used to cap contaminated Site soils. Building foundations may rest on contaminated soil, but backfill around the foundation must be clean or soil treated to meet the site-specific cleanup levels.

* + 1. Over-Excavation or Lining of Excavation Areas

In utility corridors or other areas where repeated excavation is anticipated to occur in the future and contaminants are present at concentration greater than the cleanup standards, over-excavation and backfilling with clean soil or lining the excavation with geotextile fabric before backfilling with clean soil is required to limit future exposure to contaminated soil by utility or other workers.

Utility trenches are required to be constructed to state and city standards. Additionally, the CAP requires that all utility trenches excavated through soil with contaminant concentrations exceeding the cleanup level be over-excavated to allow for a minimum 1-foot perimeter of clean soil outside the standard trench dimensions or the utility trench is required to be lined with geotextile fabric. The utility trenches are also required to be backfilled with clean or treated soil meeting the cleanup standards.

* + 1. Institutional Controls

Institutional controls are required in areas of the Site where residual contamination remains following remedial actions to control future land use and disturbance of soil, provide for long-term maintenance of caps (i.e., soil and pavement caps), to prohibit use of groundwater for potable water and to provide compliance monitoring.

* + 1. Compliance Monitoring

Compliance monitoring is required to confirm that human health and the environment are protected during the construction and operation and maintenance of the cleanup action. Compliance monitoring will also be required to confirm that cleanup actions have attained the cleanup standards prescribed in the cleanup action plan and ensure the long-term effectiveness of the remedial action including the long-term integrity of any isolation systems as well as other requirements for isolation technologies.

1. Site-specific cleanup action plan

This section presents the site-specific cleanup action plan for Development Sites 8 and 9 based on the requirements of the CD and CAP for a conceptual redevelopment plan for the Site that includes mixed use including a combination of the following:

* Construction of a multi-story building on the existing Site surface that is used for commercial development on the ground floor and residential use on the upper floors.
* Construction of a multi-story building with residential use on the ground floor and residential use on the upper floors and with below ground parking.
* Public and vehicle access to the Thea Foss Waterway and Foss Harbor Marina.
* Public access along the shoreline.
* Utility corridors.
* Public open space or park area.

Figure 8 presents a Site map that depicts a conceptual redevelopment plan and Figure 9 presents a cross section through the Site that depicts a conceptual representation of the remedial actions required to be performed as part of the cleanup action.

As stated in Section 4.2, the actual extent of each type of land use identified above (i.e., commercial, residential, public access and public park) will be determined based on the market conditions at the time of redevelopment and design prepared by a developer of the Site. The specific engineering design for remedial actions to be performed at Development Sites 8 and 9, based on the actual redevelopment to be constructed at the Site, will be presented in an Engineering Design Report (EDR) and construction plans and specifications. The EDR will be prepared in accordance with MTCA requirements. The EDR and construction plans and specifications will provide specific design requirements and procedures for completing the remedial actions at the Site.

The following sections provide additional descriptions of the actions that would be required to be performed as part of redevelopment of Development Sites 8 and 9 based on the conceptual redevelopment plan.

* 1. Site Preparation and Demolition

Redevelopment and remedial actions at the Site to support the conceptual redevelopment plan will require site preparation and demolition activities that may include the following:

* **Demolition of the two buildings present on the southern portion of the Site**. The existing buildings will likely need to be demolished to allow for Site redevelopment and implementation of remedial actions. Regulated building materials as well as other components of the existing buildings are required to be managed and disposed of in accordance with all local, state and federal regulations.
* **Demolition of pavement present at the surface over a majority of the Site.** The existing asphalt and concrete pavement will need to be demolished to the extent necessary to allow for Site redevelopment and remedial actions. The demolished asphalt pavements are required to be removed from the Site and are anticipated to be recycled or disposed of at appropriate disposal facilities. Demolished concrete pavements from the Site may be removed from the Site and recycled or disposed of at appropriate disposal facilities or may be reused onsite, where appropriate (ex., in the vadose zone), as base course beneath pavement and buildings.
* **Demolition of piling associated with existing and former Site structures.** Piling that are associated with existing or former Site structure(s), where present, will need to be demolished to extent necessary to support construction of buildings or other structures and completion of remedial actions. Demolished piling will need to be disposed of at an appropriate disposal facility.
* **Demolition of utilities.** In areas where excavation to support redevelopment and remedial actions requires removal of existing utilities, the utilities will be required to be demolished and/or decommissioned in accordance with applicable requirements. Utilities that are truncated at the limits of an excavation and have the potential to provide a transport pathway for soil or water (ex., stormwater and sanitary sewer pipes, etc.) will be required to be plugged. Grout will need to be placed in the ends of utility pipes that are truncated to prevent transport of Site media, including soil and groundwater, in the remaining portion of the pipes. The demolished components of existing utilities within the excavation will need to be disposed of at an appropriate disposal facility.
* **Demolition of other remnant structures.** Remnant structures including previous building support structures (i.e., concrete footings, pilings, etc.), concrete pads, utilities, as well as other structures (ex., buried tanks, piping, etc.) may be present beneath the surface of the Site and may be encountered during remedial actions and redevelopment activities. Remnant structures that are encountered will need to be demolished to the extent necessary to support completion of remedial actions and redevelopment and the demolished structures will need to be managed and recycled and/or disposed of at appropriate recycling and/or disposal facilities.
* **Decommissioning or modification of existing monitoring wells.** Existing monitoring wells at the Site may need to be decommissioned prior to remedial actions and redevelopment activities at the specific monitoring well locations. However, the existing monitoring wells could be protected and the well casings and protective casings could be modified (i.e., raised) to account for changes in the Site surface as a result of redevelopment activities. Decommissioning and/or modification to the monitoring wells are required to be performed by a licensed driller in accordance with state regulations.
	1. Remediation of Excavated Soil

Redevelopment of the Site, as identified in the conceptual redevelopment plan, may include excavation of soil for the following;

* Removal of all fill and soil with contaminant concentrations greater than the site-specific cleanup standards down to the mean-high groundwater level where residential use will occur on the ground floor;
* Construction of building foundations and structures;
* Below grade parking;
* Installation of utilities; and
* Grading the site.

Remedial actions at the Site are also required to include remedial excavation and removal of fill and soil on the eastern portion of the Site with lead concentrations greater than the maximum soil contaminant concentration and fill and soil that is a source contributing to nickel concentrations in groundwater that are greater than the groundwater cleanup standard to comply with the Thea Foss Waterway Redevelopment CAP.

The extent of excavation to install building foundations and structures will be dependent on the design of the building to be constructed. Excavation to construct below grade parking is to be performed to the depth of the mean-high groundwater level. Installation of utilities will include excavation of utility trenches and corridors in accordance with the requirements of the CAP and Site grading will be needed to facilitate stormwater conveyance as well as transition between surface features on the Site (i.e., between building access areas and esplanade structures) and between Site surface features and surface features on adjacent Sites (i.e., between esplanade structures on the Site and on adjacent Sites). Additionally, Site grading will be required to facilitate transition between different cap types (i.e., soil cap and pavement caps) utilized to contain contaminated soil (Figure 9).

As previously stated, remediation is required for all soil with contaminant concentrations greater than site-specific cleanup standards removed from excavations performed at the Site. The CAP specifies that excavated soil with contaminant concentrations greater than the cleanup standards can’t be relocated on site and capped. Contaminated soil that is treated to meet the cleanup levels presented in Table 1 or soil present at the Site that meets the cleanup levels as well as other Site redevelopment considerations (ex., geotechnical requirements) can be reused on site.

Fill and soil present at the Site has been identified to contain cPAHs, metals, and petroleum hydrocarbons at concentrations greater than the cleanup standards. Additionally, fill/soil with lead concentrations greater than the maximum soil contaminant concentration and fill/soil that is a source contributing to nickel concentrations in groundwater at concentrations greater than the groundwater cleanup standards is present on the eastern portion of the Site. Nickel concentrations in fill/soil present in the area of monitoring well location HB-MW02 were the highest detected at the Site. A conceptual redevelopment plan that includes excavation of all fill/soil down to the mean-high groundwater table is anticipated to remove lead detected at a concentration greater than the maximum contaminant concentration (i.e., 2,630 mg/kg in a sample collected from test pit location HB-TP05; Figure 7B) and fill/soil with the highest concentrations of nickel (i.e., sampling locations HB-TP04, HB-TP05, HB-TP06 and HB-TP07; Figure 7B; Table B-3 in Appendix B) contributing to nickel in groundwater at monitoring well HB-MW02 (Figure 7B).

Additional characterization will be required to evaluate fill and soil at the Site for treatment, off-site disposal, or on site reuse and to confirm the limits of soil with elevated nickel concentrations and lead at concentrations greater than the maximum soil contaminant concentration on the eastern portion of the Site. The specific procedures for performing additional characterization for evaluating and determining appropriate treatment and/or disposal and for confirming the area with elevated nickel concentrations and lead at concentrations greater than the maximum soil contaminant concentration will be identified in a Compliance Monitoring Plan included in the EDR prepared for performing remedial actions and redevelopment construction activities. The Compliance Monitoring Plan will be prepared in accordance with MTCA requirements (WAC 173-340-410). Possible approaches include performing insitu characterization prior to remedial and redevelopment construction and/or characterization during construction.

Pre-construction insitu characterization could include advancement of test pits and/or soil borings in the proposed excavation and remedial action areas and sampling and analysis of various fill and soil at the Site. Analysis would include Site contaminants as well as analytes and analyses required by potential treatment and disposal facilities including compliance with the Dangerous Waste Regulations (Chapter 173-303 WAC). The results of the insitu characterization would be compared to site‑specific cleanup standards, requirements specified by potential disposal facilities, as well as evaluated for potential treatment. Additional testing including geotechnical analyses could be performed to evaluate potential reuse onsite of soil meeting the site-specific cleanup standards.

Characterization during remedial and redevelopment construction would include excavation, stockpiling, and sampling and analysis to evaluate treatment, disposal, and reuse and sampling and analysis to confirm the extent of fill and soil with elevated nickel concentrations and lead at concentrations greater than the maximum soil contaminant concentration on the eastern portion of the Site. A combination of the results from previous remedial investigations and field screening during remedial and redevelopment construction could be used to segregate fill and soil for evaluation for treatment, off-site disposal, or on site reuse as well as confirm the extent of fill and soil with elevated nickel concentrations and lead at concentrations greater than the maximum soil contaminant concentration. Field screening would include, but not be limited to, evaluation for the following:

* Fill of various types that would have similar contaminant characteristics and/or similar disposal designations including debris such as: asphalt; concrete; creosote-treated wood; slag; ash, cinders, burned debris; coal; or other material types;
* Fill and soil having visual signs of contamination including, but not limited to, staining, oxidation or discoloration as well as olfactory indication of contamination (i.e., odor);
* Fill and soil with oil residue or other indications of petroleum contamination (i.e., sheen, tar, etc.);
* Fill and soil that register "hits" or signs of potential contamination on field screening devices (i.e., organic vapor analyzer).

Similar to insitu characterization, analysis of stockpiled materials and fill/soil sampled to confirm the extent of elevated nickel concentrations and lead at concentrations greater than the maximum soil contaminant concentration would include Site contaminants as well as analytes and analyses required by potential treatment and disposal facilities. The results would be compared to site-specific cleanup standards, requirements specified by potential disposal facilities, as well as evaluated for potential treatment. Additional testing including geotechnical analyses could be performed to evaluate potential on site reuse of soil meeting the site-specific cleanup levels.

The evaluation of the applicability of treatment, off-site disposal, or on site reuse will be based on fill and soil type and characteristics and the results of sampling and analysis. The following will be considered when evaluating treatment and off-site disposal of excavated fill and soil:

* Thermal desorption is potentially applicable for cPAH and petroleum hydrocarbon contaminated soil with relatively low levels of metals and minimal to no debris. This is a preferred remediation method as contaminants are permanently destroyed in the process of treatment. Thermal desorption can either be conducted on Site or performed at an off-site treatment facility.
* Subtitle D landfill disposal is potentially applicable for contaminated fill and soil that does not designate as hazardous or Dangerous Waste (Chapter 173-303 WAC) based on the results of analysis and testing or designation based on material type (i.e., creosote-treated wood). Disposal at a specific Subtitle D landfill is subject to the landfill’s approval.
* Subtitle C landfill disposal is potentially applicable for contaminated fill and soil that designates as hazardous or Dangerous Waste. Fill and soil that designates as hazardous or Dangerous Waste is required to be managed in accordance with the Dangerous Waste regulations (Chapter 173-303 WAC). Disposal at a Subtitle C landfill is subject to the landfill’s approval. Fill or soil designating as hazardous or Dangerous Waste based on the presence of leachable metals may require treatment by stabilization prior to disposal. Stabilization can be performed by the landfill prior to disposal or could be performed on Site prior to disposal.
* On site reuse is potentially applicable for soil that contains contaminant concentrations less than the site-specific cleanup standards and that is not a source of or contributing to groundwater concentrations greater than the cleanup standards. Additionally, soil reused on Site will need to meet other redevelopment considerations (i.e., geotechnical requirements). In general, soil reused on Site should contain minimal debris and be free of organic materials (i.e., wood) and large debris (i.e., concrete).
	1. Isolation Beneath Soil or Pavement Caps

Soil or pavement caps will be required in redevelopment areas where soil remains with contaminant concentrations greater than site-specific cleanup standards. Asphalt and concrete pavement is anticipated to be utilized to isolate contaminated soil in public access areas including esplanade areas, sidewalks, and vehicle driveways and parking. Soil is anticipated to be utilized to isolate contaminated soil in areas where vegetation (i.e., grass, bushes, etc.) will be installed including open space and landscape areas (Figures 8 and 9).

Asphalt and concrete pavement installed to cap contaminated soil will be constructed for the intended purpose (i.e., esplanade, vehicle driveway and parking, etc.) in accordance with local and state requirements. Additionally, concrete structures including building foundations or concrete slabs can also provide isolation and containment of residual contaminated soil.

Soil caps are required to be comprised of 3 feet of imported or Site soil meeting the site-specific cleanup standards. Analytical testing will be required to confirm that imported or Site soil used for Site caps meet the site-specific standards. The sampling and analysis of soil used for Site caps will be described in a Compliance Monitoring Plan included in the EDR prepared in accordance with MTCA requirements (WAC 173-340-410). The testing will include analysis for Site contaminants to ensure compliance with the site-specific cleanup standards as well as other physical testing as necessary to support the proposed use.

Locations or areas of transition between the cap types (i.e., pavement types or soil to pavement) will be constructed to meet the requirements of the CD and CAP as well as local and state requirements for the intended use. Areas of transition between cap types will be constructed to ensure isolation and containment of residual contaminated soil.

All contaminated soil that is excavated to install Site caps will be required to be remediated as described in Section 5.4.2. Excavation of soil for installation of Site caps is anticipated to include removal of soil to allow placement of base course materials (i.e., gravel) prior to paving and Site grading to support stormwater conveyance as well as transition between Site structures and Site surface features and between Site surface features and surface features on adjacent Sites.

* 1. Over-Excavation or Lining of Excavation Areas

Utility trenches and corridors excavated as part of Site redevelopment are required to be constructed to meet state and local standards for the utilities to be installed. Additionally, as specified in Section 5.4.3, utility trenches and corridors or other areas with contaminant concentrations greater than the cleanup standards where repeated excavation is anticipated to occur in the future, over-excavation and backfilling with clean soil or lining the excavation with geotextile fabric before backfilling with clean soil is required to limit future exposure to contaminated soil by utility or other workers. Fill and soil with contaminant concentrations greater than site-specific cleanup standards that are excavated to install utilities are required to be treated or disposed as described in Section 5.3.1.

* 1. Institutional Controls

Institutional controls will be required as contamination will remain following remedial actions and redevelopment of the Site. The institutional controls are required to be implemented to control future land use and excavations, provide for long-term maintenance of caps (i.e., soil and pavement caps), prohibit use of groundwater for potable water, and to provide compliance monitoring. Institutional controls will be implemented in accordance with MTCA requirements (WAC 173-340-440).

* 1. Compliance Monitoring

Compliance monitoring consists of protection monitoring, performance monitoring and confirmational monitoring. Protection monitoring is conducted to confirm that human health and the environment are adequately protected during construction and the operation and maintenance period of a cleanup action. Performance monitoring is conducted to confirm that the remedial action has attained cleanup standards. Confirmational monitoring (soil, groundwater, and/or sediment) is conducted to confirm the long-term effectiveness of the remedial action once cleanup standards or other performance standards have been attained. Compliance monitoring will be performed according to the MTCA criteria specified in WAC 173-340-410 and -360(8) and the requirements of the CD and CAP.

Protection monitoring will be performed during construction to ensure that site workers are appropriately trained in health and safety and that appropriate health and safety plans and procedures are implemented during remedial actions. Additionally, appropriate erosion and sedimentation controls and site drainage control measures will be implemented to ensure that no discharge occurs to the Thea Foss Waterway during remedial activities.

Performance monitoring will be performed to ensure construction quality control measurements and monitoring are performed in accordance with the EDR and plans and specifications as well as all sampling and analysis necessary to evaluate compliance with cleanup standards and to evaluate treatment, disposal, and reuse. Additionally, performance monitoring will be performed to monitor and ensure compliance with environmental requirements related to permits and substantive requirements for remedial actions and redevelopment.

Confirmational monitoring will include groundwater sampling and analysis to verify compliance with site-specific groundwater cleanup standards. The groundwater monitoring will be performed after completion of remedial actions to verify that remedial actions performed at the Site results in contaminant concentrations in groundwater being less than the cleanup standards.

The protection, performance, and confirmational monitoring to be performed during and after remedial actions and redevelopment at the Site will be described in a Compliance Monitoring Plan prepared in accordance with MTCA requirements (WAC 173-340-410) and submitted as part of the EDR.

1. Cleanup Action Evaluation Criteria

This section presents a description of the threshold requirements for cleanup actions and the additional criteria used to evaluate cleanup actions under MTCA. This section also describes how the remedial actions to be performed at the Site meet the evaluation criteria.

* 1. Threshold Requirements

Remedial actions performed under MTCA must comply with basic threshold requirements. Remedial actions that do not comply with the threshold requirements are not considered suitable remedial actions under MTCA. As identified in CAP and MTCA [WAC 173-340-360(2)(a)], the four threshold requirements for remedial actions are that they must:

* Protect human health and the environment;
* Comply with cleanup standards;
* Comply with applicable state and federal laws; and
* Provide for compliance monitoring.

Each of the threshold requirements are discussed in the following sections.

* + 1. Protection of Human Health and the Environment

The results of remedial actions performed under MTCA must ensure that both human health and the environment are protected.

The cleanup action specified in this SCAP protects human health and the environment by eliminating direct contact with contaminants in soil present at the Site. Contaminated soil at the Site will be isolated below pavement and soil caps as well as buildings. Additionally, contaminated soil that is excavated will be treated or disposed at an appropriate off-site disposal facility reducing the volume of contaminated material present at the Site.

Nickel has been detected in groundwater at a concentration greater than the site-specific cleanup level at monitoring location HB-MW02 (Figure 5). Fill and soil with the highest concentrations of nickel was observed in three test pits (i.e., HB-TP05, HB-TP06 and HB-TP07) nearest to monitoring well HB-MW02 indicating that soil in this area is the likely source of nickel in groundwater. The remedial actions performed at the Site will remove the fill and soil that is the likely source of nickel in groundwater. Confirmational monitoring of groundwater will verify that the remedial actions at the Site are protective of groundwater and surface water in the Thea Foss Waterway.

* + 1. Compliance with Cleanup Standards

Compliance with cleanup standards requires that cleanup standards are met at the applicable points of compliance.

Where a remedial action involves containment of soil with contaminant concentrations exceeding cleanup standards, the remedial action may be determined to comply with cleanup standards, provided the requirements specified in WAC 173-340-740(6)(f) are met. The selected cleanup action will comply with the cleanup standards specified in the CAP and WAC 173-340-740(6)(f) as the cleanup action is protective of human health and the environment, includes implementation of institutional controls that limit activities that could interfere with the long-term integrity of the caps, and includes compliance monitoring to ensure the long-term integrity of the caps.

* + 1. Compliance with Applicable State and Federal Laws

Remedial actions conducted under MTCA must comply with state and federal laws that are applicable or relevant and appropriate requirements (ARARs). Applicable state and federal laws include legally applicable requirements and those requirements that Ecology determines to be relevant and appropriate (WAC 173‑340-710). The ARARs that have been identified to be applicable or potentially applicable to the remedial actions to be performed as part of the cleanup action and redevelopment of Development Sites 8 and 9 are presented in Table 2.

As the remedial actions at Development Sites 8 and 9 are being conducted under a CD with Ecology, the remedial actions meet the procedural exemption provisions of MTCA (WAC 173-340-710[9]) and therefore, are not required to follow the procedural requirements of most State and local laws that would otherwise apply to the action. The remedial action will, however, comply with the substantive requirements of the applicable State and local laws. The exemption is not applicable if Ecology determines that the exemption would result in the loss of approval from a federal agency that may be necessary for the state to administer any federal law. The laws that are subject to the procedural requirements exemption include the following:

* **Washington Shoreline Management Act -** The Washington Shoreline Management Act (RCW 90.58) and its implementing regulations establish requirements for substantial developments occurring within water areas of the state or within 200 feet of the shoreline. The Site remedial actions will comply with substantive requirements set forth by the City, but a shoreline permit will not be required for the remedial action components of the Site redevelopment.
* **Washington Hydraulic Code -** The Washington Hydraulic Code (WAC 220-110) establishes regulations for the construction of any hydraulic project or the performance of any work that will use, divert, obstruct, or change the natural flow or bed of any of the salt or fresh water of the State. The code requires that a Hydraulic Project Approval (HPA) permit (administered by the Washington Department of Fish and Wildlife) be obtained for any activity that could adversely affect fisheries and water resources. Although an HPA permit will not be required for planned remedial actions, substantive timing restrictions and technical requirements under the code are potentially applicable to any remedial actions and shoreline restoration activities performed below MHHW.
	+ 1. Provision for Compliance Monitoring

The remedial action must include compliance monitoring in accordance with WAC 173-340‑410. As stated above, a Compliance Monitoring Plan will be prepared and submitted as part of the EDR. The Compliance Monitoring Plan will identify the monitoring requirements for each of the elements of the remedial actions.

* 1. Additional Evaluation Criteria

The CAP identifies additional criteria that are to be evaluated for remedial actions performed on Development Sites 8 and 9. The additional evaluation criteria include the following:

* Short-term effectiveness;
* Long-term effectiveness;
* Permanent reduction of toxicity, mobility, or volume;
* Implementability and technical feasibility; and
* Cost.

Each of the additional evaluation criteria are discussed in the following sections.

* + 1. Short-Term Effectiveness

The short-term effectiveness considers how the cleanup action impacts human health and the environment during the construction phase and prior to the attainment of cleanup standards.

Human health risks associated with remedial action construction include worker and community exposure to contaminants in Site media (i.e., soil and groundwater) during excavation and other remedial actions as well as physical injury from construction activities. Exposure to contaminated Site media during construction will be addressed through development and implementation of site-specific health and safety plans as part of the remedial action construction plans. Health and safety plans will identify the risks associated with the remedial actions to be performed at the Site and the procedures to address the identified risks.

Risks to the environment associated with remedial action construction include the potential for contaminant discharges to the Thea Foss Waterway. The potential for releases to the Thea Foss Waterway will be addressed through development and implementation of temporary erosion and sediment controls (TESC) and a Construction Stormwater Pollution Prevention Plan (SWPPP) that identifies best management practices (BMPs) to prevent off-site transport of Site media. The TESC and SWPPP will be prepared as part of development of the EDR and project plans and specifications.

* + 1. Long-Term Effectiveness

The long-term effectiveness of the cleanup action is evaluated in terms of the magnitude of residual risk and the adequacy and reliability of the cleanup action.

The residual risk at the Site will be substantially reduced by removal and treatment and/or disposal at an appropriate disposal facility of contaminated fill and soil. Additionally, the long-term risk of exposure to contaminants in fill and soil will be substantially reduced by isolating the contaminated fill and soil at the Site beneath pavement and soil caps. The risk to future workers will also be reduced by constructing utility trenches and corridors with clean backfill.

Compliance monitoring and implementation of institutional controls will ensure the long-term reliability and adequacy of the cleanup action. As stated above, compliance monitoring will include periodic review of the remedial actions to evaluate the integrity of the cap surfaces to ensure isolation of the fill and soil remaining on Site with contaminant concentrations greater than the cleanup standards. Groundwater monitoring will also be performed to ensure that groundwater at the Site is protective of surface water in the Thea Foss Waterway. Institutional controls including deed restrictions will limit activities that would affect the remedial actions (i.e., excavation of the capped areas) and prohibit groundwater extraction and for use as potable water.

* + 1. Permanent Reduction of Toxicity, Mobility, or Volume

This evaluation criterion addresses the preference for treatment technologies that permanently and significantly reduce toxicity, mobility, and volume of the hazardous substances present at the Site.

All contaminated, excavated fill and soil will require treatment or off-site disposal. Treatment will be utilized, if appropriate based on the contaminant types and material characteristics, to reduce the toxicity, mobility, and volume of contaminated Site fill and soil. Off-site disposal at an appropriate disposal facility will reduce the overall volume of contamination present at the Site and the potential mobility of contaminants in fill and soil.

* + 1. Implementability and Technical Feasibility

Implementability and technical feasibility includes consideration of whether the remedial actions are technically possible considering, but not limited to, the following:

* Administrative and regulatory requirements;
* Availability of required materials, facilities, or services;
* Access for construction and monitoring; and
* Integration with existing facility operations and other remedial actions.

The remedial actions to be performed at the Site have been implemented and used reliably elsewhere including at other upland properties adjacent to the Thea Foss Waterway to remediate contaminated soil with similar characteristics and therefore, are proven to be technically feasible and implementable. The administrative and regulatory requirements are manageable and there are readily available materials, facilities, and service providers to complete the remedial actions. The remedial actions that were selected in the CAP that are to be implemented at Development Sites 8 and 9 are designed to be integrated with the land use and redevelopment at the Site.

* + 1. State and Community Acceptance

Acceptance of the cleanup action will be evaluated based on review of the Draft SCAP. The draft SCAP will be submitted for public comment. Based on the information gathered from the public, Ecology arrive at the final cleanup action for Development Sites 8 and 9. The final cleanup action will be documented in the final SCAP prepared by Ecology.

* + 1. Cost

The estimated cost to implement the remedial actions at Development Sites 8 and 9 based on the conceptual redevelopment plan presented in Section 5.2 and as shown on Figures 8 and 9 is presented in Table 3. Table 3 includes the assumptions used to develop the remedial action cost estimate. The actual remedial action costs will be determined based on the actual redevelopment that is constructed and design prepared by a developer of the Site.

1. IMPLEMENTATION OF THE CLEANUP ACTION

Implementation of the cleanup action will require development of remedial design documents and plans and preparation of permit applications and agency approval, where applicable, prior to remedial action construction. Remedial design documents, plans, and permits and agency approval will be developed based on the actual development plans put forth by the future developer of the Site following approval of this SCAP.

An EDR will be prepared that includes the information required under MTCA [WAC 173‑340‑400(4)(a)] and shall include sufficient information for the development and review of construction plans and specifications. The following information shall be included in the EDR, as appropriate:

* Goals of the cleanup action including specific cleanup or performance requirements;
* General information on the Site including a summary of information as necessary to reflect the current conditions;
* Identification of who will own, operate, and maintain the cleanup action during and following construction;
* Site maps showing existing site conditions and proposed location of the cleanup actions;
* Characteristics, quantity, and location of materials to be treated or otherwise managed;
* A schedule for final design and construction;
* A description and conceptual plan of the actions and processes required to implement the cleanup action;
* Engineering justification for design and operation of the cleanup actions including design criteria for all components of the cleanup action, expected treatment and containment efficiencies, and demonstration that the cleanup action will achieve compliance with cleanup requirements;
* Design features for control of hazardous materials, spills, and accidental discharges;
* Design features to assure long-term safety of workers and local residences;
* Methods for management or disposal of any treatment residual and other waste materials containing hazardous substances generated as a result of the cleanup action;
* Site specific characteristics that may affect design, construction, or operation of the cleanup action;
* A general description of construction testing that will be used to demonstrate adequate quality control;
* A general description of compliance monitoring that will be performed during and after construction to meet the requirements of MTCA (WAC 173-340-410);
* A general description of construction procedures proposed to assure that the safety and health requirements of MTCA (WAC 173-340-810) are met;
* Information needed to fulfill the applicable requirements of the State Environmental Policy Act (SEPA) (Chapter 43.21C RCW);
* Any additional information needed to address the applicable state, federal and local requirements including the substantive requirements for any exempted permits; and
* Any Site access issues which need to be resolved to implement the cleanup action.

Construction plans and specifications will be prepared that detail the cleanup actions to be performed and will be prepared in conformance with currently accepted engineering practices and techniques. The construction plans and specifications will include the following information, as applicable:

* A general description of the work to be performed and a summary of the engineering design criteria from the EDR;
* Location map and existing Site conditions map;
* A copy of any permits and approvals;
* Detailed plans, procedures, and material specifications necessary for construction of the cleanup action;
* Specific quality control tests to be performed to document the construction, frequency of testing, acceptable results, and other documentation methods;
* Additional information to address applicable state, federal, and local requirements including the substantive requirements for any exempted permits;
* A compliance monitoring plan prepared under MTCA (WAC 173-340-410) describing monitoring to be performed during construction as well as a sampling and analysis plan meeting MTCA requirements (WAC 173-340-820);
* Provisions to assure safety and health requirements of MTCA (WAC 173-340-810) are met.

Permits and approvals and any substantive requirements for exempted permits, if required for construction or to otherwise implement the cleanup action, shall be identified and where possible, resolved before, or during, the design phase to avoid delays during construction and implementation of the cleanup action.

All aspects of construction will be performed and documented in accordance with MTCA requirements [WAC 173‑340‑400(6)] including approval of all of the plans listed above prior to commencement of work, oversight of construction by a Professional Engineer licensed in the State of Washington, and submittal of a Construction Completion Report that documents all aspects of the cleanup and includes an opinion of the engineer as to whether the cleanup was conducted in substantial compliance with the CAP, the EDR and the construction plans and specifications.

* 1. Anticipated Schedule for Design and Implementation

The schedule for development of an EDR, plans, and specifications and implementation of the cleanup action is not known at this time. The schedule for the cleanup action will be based on redevelopment of the Site.

1. Limitations

We have prepared this report for the exclusive use of the Foss Waterway Development Authority for Site Specific Cleanup Action Plan for Development Sites 8 and 9 in Tacoma, Washington. Foss Waterway Development Authority may distribute copies of this report to regulatory agencies as may be required for the Project.

Within the limitations of scope, schedule and budget, our services have been executed in accordance with generally accepted environmental science practices in this area at the time this report was prepared. The conclusions and opinions presented in this report are based on our professional knowledge, judgment and experience. No warranty, express or implied, applies to this report.

Please refer to the appendix titled “Report Limitations and Guidelines for Use” for additional information pertaining to use of this report.

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Appendix A

 Area-Wide Consent Decrees and Thea Foss Redevelopment Cleanup Action Plan

Appendix B

 Draft Site-Specific Remedial Investigation Report

Appendix C

 Sitts & Hill Survey Drawing

Appendix D

Emergency Interim Action Documentation

Appendix E

 Regulated Building Material Survey Report

Appendix F

 Replacement Esplanade Plans for
Development Site 9