STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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WAC 197-11-970 Determination of Nonsignificance (DNS).

DETERMINATION OF NONSIGNIFICANCE

Description of proposal: A Remedial Action (RA) is proposed to accomplish proposed and necessary remedial action tasks at the USG Interiors Highway 99 site in Milton, WA. The RA, which is being done under the Model Toxics Control Act (MTCA), consists of 1) supplemental subsurface investigation to further delineate the extent and magnitude of soil containing elevated arsenic concentrations; 2) solidification and/or chemically stabilization of elevated arsenic concentration in the soil; 3) treating arsenic contaminated groundwater with an in-situ chemical oxidation (ISCO) technology; and 4) replacing a portion of the existing pavement with permeable pavement in order to promote and maintain the groundwater conditions necessary to ensure the ISCO treatment is effective. The RA will commence upon signing Agreed Order No. DE 11099, which includes the cleanup action plan.

Proponent: USG Interiors, Inc.

Location of proposal: Approximately located at 7110 Pacific Highway East in Milton, WA. The site includes Pierce County parcel numbers 0420057003, 0420057004, 0420057005, 0420057006, 0420057007, 0420057008, 0420053075, and 0420053076.

Lead agency: Washington State Department of Ecology

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030 (2)(c). This decision was made after review of a completed environmental checklist, the remedial investigation/feasibility study report, draft cleanup action plan, and other information on file with the lead agency. This information is available to the public on request.

☐ There is no comment period for this DNS.

☐ This DNS is issued after using the optional DNS process in WAC 197-11-355. There is no further comment period on the DNS.

☒ This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for at least 14 days from July 9, 2015. Comments must be submitted by: August 11, 2015.

Responsible official: Rebecca S. Lawson, P.E., LHG

Position/title: Washington State Department of Ecology, Southwest Regional Office, Section Manager.
Phone: (360) 407-6241

Address: P.O. Box 47775, Olympia, WA 98504-7775

Date: 7/7/2015 Signature: Rebecca S. Lawson

Revised Introduction and New On-line Guidance
March 2012

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

***Instructions for applicants*:**

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies or reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:
Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal, and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

Please complete all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D) for nonproject actions.

A. BACKGROUND

1. Name of proposed project, if applicable:
   USG Interiors Highway 99 Site Cleanup Action

2. Name of applicant:
   USG Corporation

3. Address and phone number of applicant and contact person:
   USG Corporation
   550 West Adams Street
   Chicago, Illinois 60661-3676
   Attention: Kim Peterson (312) 436-4502

4. Date checklist prepared:
August 28, 2014

5. Agency requesting checklist:
Washington State Department of Ecology

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

Task	Schedule
Inadvertent and Unanticipated Discovery Plan	30 days from the effective date of Agreed Order
Draft Bench-Scale Testing Sampling and Analysis Plan	60 days from the effective date of Agreed Order
Begin Hot Spot Delineation Fieldwork	45 days after receiving Ecology approval of the Bench-Scale Testing Work Plan
Begin Bench-Scale Testing	60 days after receiving Ecology approval of the Bench-Scale Testing Work Plan
Draft Bench-Scale Testing Report	270 days after receiving Ecology approval of the Bench-Scale Testing Work Plan
Draft Engineering Design Report and Compliance Monitoring Plan	120 days after receiving Ecology approval for the Bench-Scale Testing Report
Draft Construction Plans and Specifications – Soil/Fill Hot-Spot Solidification	90 days after receiving Ecology approval of the Engineering Design Report and Compliance Monitoring Plan
Begin Contractor Procurement	30 days after receiving Ecology approval of Construction Plans and Specifications
Begin Cleanup Action - Soil/Fill Hot-Spot Solidification	180 days after receiving Ecology approval of Construction Plans and Specifications
Begin Pilot Test of *In Situ* Chemical Oxidation (ISCO) of Groundwater (includes 1 year of performance groundwater monitoring)	30 days after completion of Soil/Fill Hot-Spot Solidification fieldwork
Draft ISCO Pilot Test Report	420 days after commencement of ISCO Pilot Test
Draft Construction Plans and Specifications, Draft Operations and Maintenance Plan – Groundwater ISCO	90 days after receiving Ecology approval of ISCO Pilot Test Report
Begin Cleanup Action - Groundwater ISCO (includes hot-spot treatment, construction of ISCO trenches, operations and maintenance, and performance	90 days after receiving Ecology approval of Construction Plans and Specification, and Operations and Maintenance Plan –

monitoring)	Groundwater ISCO
Begin Permeable Pavement Construction	To be determined by results of Groundwater ISCO Performance Monitoring
Begin Cleanup Action - Hylebos Creek Sediment	To be determined by results of Groundwater ISCO Performance Monitoring, but no later than 720 days after beginning Groundwater ISCO Cleanup Action. Construction will depend on in-water work period.
Confirmational Groundwater Monitoring	To be determined by results of Groundwater ISCO Performance Monitoring

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

Confirmational groundwater monitoring will continue after the active remedial construction elements of the remedy have been completed.

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

a. *Draft Cleanup Action Plan, USG Interiors Highway 99 Site, Milton, Washington.* Issued by the Washington State Department of Ecology. April 24, 2014.
b. CDM Smith. 2012. *Draft Remedial Investigation Report, USG Interiors Highway 99 Site, Milton, Washington.* July 11, 2012.
c. CDM Smith. 2013. *Remedial Investigation Report Addendum, USG Interiors Highway 99 Site, Milton, Washington.* January 14, 2013.
d. CDM Smith. 2013. *Feasibility Study, USG Interiors Highway 99 Site, Milton, Washington.* September 13, 2013

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

No.

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

The cleanup action at the USG Highway 99 site will be conducted under an Agreed Order with the Washington State Department of Ecology; therefore, the cleanup action is exempt from the procedural requirements of certain laws and all local permits (WAC 173-340-710[9][a]) but must comply with the substantive requirements of these laws and permits. The exemption from procedural requirements applies to:

- Washington Clean Air Act (RCW 70.94)
- Solid Waste Management Act (RCW 70.95)
- Hazardous Waste Management Act (RCW 70.105)

- Construction Projects in State Waters (RCW 75.20)
- Water Pollution Control Act (RCW 90.48); the Shoreline Management Act (RCW 90.58)

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The USG Highway 99 site is located between Pacific Highway East and Interstate 5 in Milton, Washington as shown on **Figure 1**. It is located in a commercial area situated between the east side of Pacific Highway East and Interstate 5. Four principal businesses operate on the site: Freeway Trailer, Kanopy Kingdom, General Trailer, and Linwood Custom Homes, as shown on **Figure 2**. In addition, Northwest Camping Center operates on a parcel leased from Freeway Trailer Sales and Budget RV operates on two parcels leased from Kanopy Kingdom. The northern property boundary of Linwood Custom Homes marks the northern end of the site. The western edge of the site is the boundary between these businesses and Pacific Highway East. Interstate 5 marks the eastern boundary of the site. Hylebos Creek and 70th Avenue East mark the southern boundary of the site.

From 1971 through 1973, industrial waste from USG's Tacoma, Washington plant was used as fill at the site. The USG Tacoma plant used ASARCO slag as a raw material for mineral fiber production. ASARCO slag was produced as a result of lead and copper ore smelting and was later found to contain high concentrations of arsenic. The industrial waste generated by USG through use of this slag also contained high concentrations of arsenic.

In the early 1980s, USG became aware of the association between ASARCO slag and arsenic contamination. USG conducted a source removal action in 1984/1985 at the site. Approximately 20,000 to 30,000 cubic yards of waste fill and native soil was excavated and disposed of offsite. USG conducted post-remediation groundwater monitoring. In 2006, USG conducted an environmental site assessment at the site. The assessment showed that arsenic concentrations at the site exceeded the Washington State Model Toxics Control Act (MTCA) Method A cleanup levels of 20 milligrams per kilogram (mg/kg) in soil and 5 micrograms per liter (µg/L) in groundwater.

USG is proposing to remediate arsenic in soil and groundwater at the site by conducting the following activities:

- Conducting a subsurface investigation to further delineate the fill/soil arsenic hot spot located around boring locations B4, B5, and B6 (**Figure 3**).
- Conducting a bench-scale study to select an optimal solidification/stabilization mix design for *in-situ* treatment of the fill/soil arsenic hot spot.
- Conducting a bench-scale study to assess soil oxidant demand, select the most effective oxidant, and determine whether metered or batch delivery of the oxidant will work best to treat dissolved arsenic in groundwater.
- Solidifying the fill/soil hot spot by injecting a cement-based reagent and auger mixing.
- Conducting a pilot test of the *in-situ* chemical oxidation treatment of groundwater, including verification monitoring.

- Treating the groundwater arsenic hot spot by *in-situ* chemical oxidation. Chemical oxidant would be injected into several injection wells installed at the site around Well 99-1 (**Figure 3**).
- Treating the arsenic groundwater plume in the core remediation area by *in-situ* chemical oxidation. Chemical oxidant would be injected into the subsurface using injection trenches situated at the hydraulically upgradient sides of the site using either batch or metering methods as determined by the bench-scale test.
- Constructing coffer dams at both ends of the planned sediment cleanup area in Hylebos Creek and then excavating impacted sediment for off-site disposal. Restoring the creek channel using clean sand and removing the coffer dams.
- Replacing a portion of pavement in the core remediation area with permeable pavement to allow precipitation to infiltrate, promoting oxidizing groundwater conditions and minimizing arsenic mobility. The location and extent of replacement permeable pavement will be determined after an analysis of performance groundwater monitoring data.
- Monitoring natural attenuation by collecting groundwater samples to ensure that arsenic concentrations decline over time and geochemical conditions promote the stability of the iron-arsenic oxyhydroxide co-precipitates throughout the arsenic plume.
- Implementing institutional controls such as land use controls and groundwater use restrictions.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The 8.41-acre USG Highway 99 site is located between Pacific Highway East and Interstate 5 in Milton, Washington (**Figure 1)** in Township 20N, Range 04E, Section 5. Included within the site are six businesses located at the following addresses (**Figure 2**):

- Linwood Custom Homes – 7220 Pacific Highway E, Milton, WA
    - Tax parcel: 0420057003
- General Trailer – 7200 Pacific Highway E, Milton, WA
    - Tax parcel: 0420057004
- Kanopy Kingdom – 7110 Pacific Highway E, Milton, WA
    - Tax parcels: 0420057005, 0420057006
- Discount RV – 7110 Pacific Highway E, Milton, WA
    - Tax Parcels: 0420057007, 0420057008 (owned by Kanopy Kingdom)
- Freeway Trailer Sales, Inc. – 7100 Pacific Highway E, Milton, WA
    - Tax parcels: 0420053075
- Northwest Camping Center – 7100 Pacific Highway E, Milton, WA
    - Tax parcel: 0420053076 (owned by Freeway Trailer Sales, Inc.)

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site
(circle one): Flat, rolling, hilly, steep slopes, mountainous,
(other)_____

The western paved portion of the site is relatively flat but drops off sharply east of the paved area where the surface slopes down to Hylebos Creek or a drainage ditch.

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

59% slope to Hylebos Creek.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

Fill - Silty sand.

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

No.

e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

The planned soil and groundwater remedies employ *in-situ* methods and no filling is planned. Proposed soil solidification may raise the grade on the two southernmost Kanopy Kingdom parcels. If so, surface soil may be removed from these parcels as required to restore the grade. A small amount of sand fill will be used to backfill Hylebos Creek after impacted sediment is excavated. The source of this fill will be determined later.

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

The project uses *in-situ* remedial methods that minimize the potential for erosion.

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

The areal extent of the site is 8.41 acres, approximately 63% of which is covered with impermeable surfaces (asphalt pavement and buildings). The project will actually reduce the amount of impervious surface at the site by replacing the current asphalt pavement. The location and extent of permeable pavement will be determined later in the project, but the conceptual remedial design calls for replacing 1.3 acres of impermeable pavement with permeable pavement.

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

The use of *in-situ* soil solidification/stabilization greatly minimizes the potential for erosion when compared to excavation and off-site disposal or other *ex-situ* treatment methods.

2. Air

a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

Dust may be generated during vertical augering, and during installation of injection trenches. Dust generated can be easily managed with standard construction techniques such as watering.

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

No.

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

Spray water to control dust during construction.

3. **Water**

a. Surface Water:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

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

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

Yes. Soil solidification will occur within 200 feet of the Hylebos Creek. Arsenic-impacted sediment will be removed from Hylebos Creek. The proposed plan is shown on **Figure 3**.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

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

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

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

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

Yes, portions of the site are within the 100-year floodplain (see attached Flood Insurance Rate Map).

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

No.

b. Groundwater:

1) Will groundwater be withdrawn, or will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

Other than the minimal quantities of groundwater periodically withdrawn during monitoring well purging and sampling as part of verification monitoring, no groundwater will be withdrawn. Expected quantities per groundwater monitoring round are 20 gallons. At this time there is no plan to discharge water to groundwater.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

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

c. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

See response B(1)(g). Approximately 63% of the project area is currently covered with impermeable pavement or buildings. In the conceptual remedy proposed in the FS, approximately 1.3 acres of this impermeable pavement will be replaced with a permeable pavement to increase stormwater recharge of groundwater.

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

The remediation elements are described in response A(11). The use of *in situ* remediation methods lessens the potential of waste materials entering ground or surface waters when compared to conventional remediation techniques.

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

Design features for control of hazardous materials spills or accidental discharges of oxidants and solidification reagents will be included in the engineering design report.

4. **Plants**

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

____deciduous tree: alder, maple, aspen, other
____evergreen tree: fir, cedar, pine, other
____shrubs
__X_grass
____pasture
____crop or grain
____ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
__X__water plants: water lily, eelgrass, milfoil, other

____other types of vegetation

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

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

Water plants in the Hylebos Creek channel will be removed as a part of sediment excavation.

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

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

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

None.

5. **Animals**

a. Circle any birds and animals which have been observed on or near the site or are known to be on or near the site:

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

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

The following species can occur in Hylebos Creek:

Chinook salmon (*Oncorhynchus tshawytcha*), federally threatened and designated critical habitat, state species of concern

Steelhead (*Oncorhynchus mykiss*), federally threatened (and proposed critical habitat)

There are documented occurrences of Pacific pond turtle (*Actinemys marmorata*), a federal species of concern, state endangered species, nearby. However, given the lack of suitable habitat it is unlikely for this species to occur at the site.

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

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

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

Implement sediment cleanup during a time of year that will minimize impact to salmon and steelhead.

6. **Energy and natural resources**

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

No significant sources of energy will be required to complete the cleanup.

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

No, the project will not affect the potential use of solar energy by adjacent properties as no structures will be constructed aboveground.

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

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

7. **Environmental health**

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

Yes. In situ chemical oxidation is proposed to treat arsenic in groundwater. The oxidant will be selected during bench-scale testing. The engineering design report will include design features for the control of oxidant spills and accidental discharges.

1) Describe special emergency services that might be required.

Ambulance service may be needed if an accident occurs during construction (i.e., during auger drilling or solidification).

2) Proposed measures to reduce or control environmental health hazards, if any:

Construction workers and oversight staff will be trained in accordance with Occupational Safety and Health Administration HAZWOPER Standard 1910.120. A project health and safety plan will be developed to establish requirements to ensure that employees will wear appropriate personal protective equipment while working at the site, and will follow proper decontamination procedures.

b. **Noise**

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

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

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

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

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

None proposed.

8. **Land and shoreline use**

a. What is the current use of the site and adjacent properties?

The parcels that comprise the site are currently occupied by six retail businesses: retail recreational vehicle sales (2 businesses), retail trailer sales, retail truck canopy sales, commercial trailer parts sales, and a sales office for custom home designs/packages and house kits.

b. Has the site been used for agriculture? If so, describe.

Yes, the site was used for agriculture prior to the construction of Interstate 5 in the early 1960s.

c. Describe any structures on the site.

The following structures are located on the site:

- Linwood Custom Homes: 1-story office building (2,011 sq ft)
- General Trailer: 1-story storage warehouse/showroom (7,890 sq ft)
- Kanopy Kingdom: 1-story storage warehouse (2,000 sq ft)
- Freeway Trailer: 1-story service garage/showroom (8,980 sq ft)

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

No.

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

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

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

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

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

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

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.

The south-eastern edge of the site has been designated as being within a high risk seismic hazard area. Most of the site, including the portion on which environmental remedial construction is planned, is located within the 100-year floodplain of Hylebos Creek.

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

Approximately 20 to 30 people work at the site. No one resides at the site. The project will not modify the number of people that work at the six businesses that currently occupy the site. The project will not result in the construction of any facilities because the work is focused on environmental remediation in the subsurface.

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

The completed project will not displace any persons.

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

Not applicable as the project will not cause displacement of any people.

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

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

9. **Housing**

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

No housing units will be constructed by this project.

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

No housing units will be eliminated by this project.

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

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

10. **Aesthetics**

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

No significant structures are anticipated for this project. Sheds may be constructed to house mechanical equipment for oxidant injection. This will be determined in the engineering design report.

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

No views will be obstructed by the project.

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

None.

11. **Light and glare**

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

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

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

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

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

The existing lighting from the six onsite businesses or highway street lights will not affect the project.

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

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

12. **Recreation**

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

No designated or informal recreational opportunities are present in the immediate vicinity of the site. Hylebos Creek is bordered on the east by Interstate 5 and by the commercial properties on the west.

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

No, the completed project will not displace any existing recreational uses.

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

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

13. **Historic and cultural preservation**

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

No.

b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

None recorded by Department of Archaeology and Historical Preservation or the Nisqually Indian Tribe.

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

Prepare inadvertent discovery plan prior to remediation.

14. **Transportation**

a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

Pacific Highway E. (also known as Highway 99) services the site. Access to Pacific Highway E. will be by driveways already available at the six businesses on the site.

b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

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

c. How many parking spaces would the completed project have? How many would the project eliminate?

The completed project will not modify the number of parking spaces currently located at the six businesses on-site.

d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

No.

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

The project will occur near the southbound lanes of Interstate 5.

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

No additional vehicular trips per day will be generated by the completed project.

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

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

15. **Public services**

a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.

No.

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

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

16. **Utilities**

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

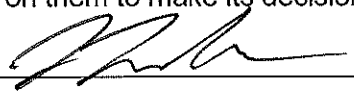
Utilities available from Pacific Highway East are highlighted in **bold** typeface.

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

Water and electrical service will likely be required for the oxidant injection trenches. Utility requirements will be determined during preparation of the engineering design report. The City of Milton provides both electrical and water utility service.

C. SIGNATURE

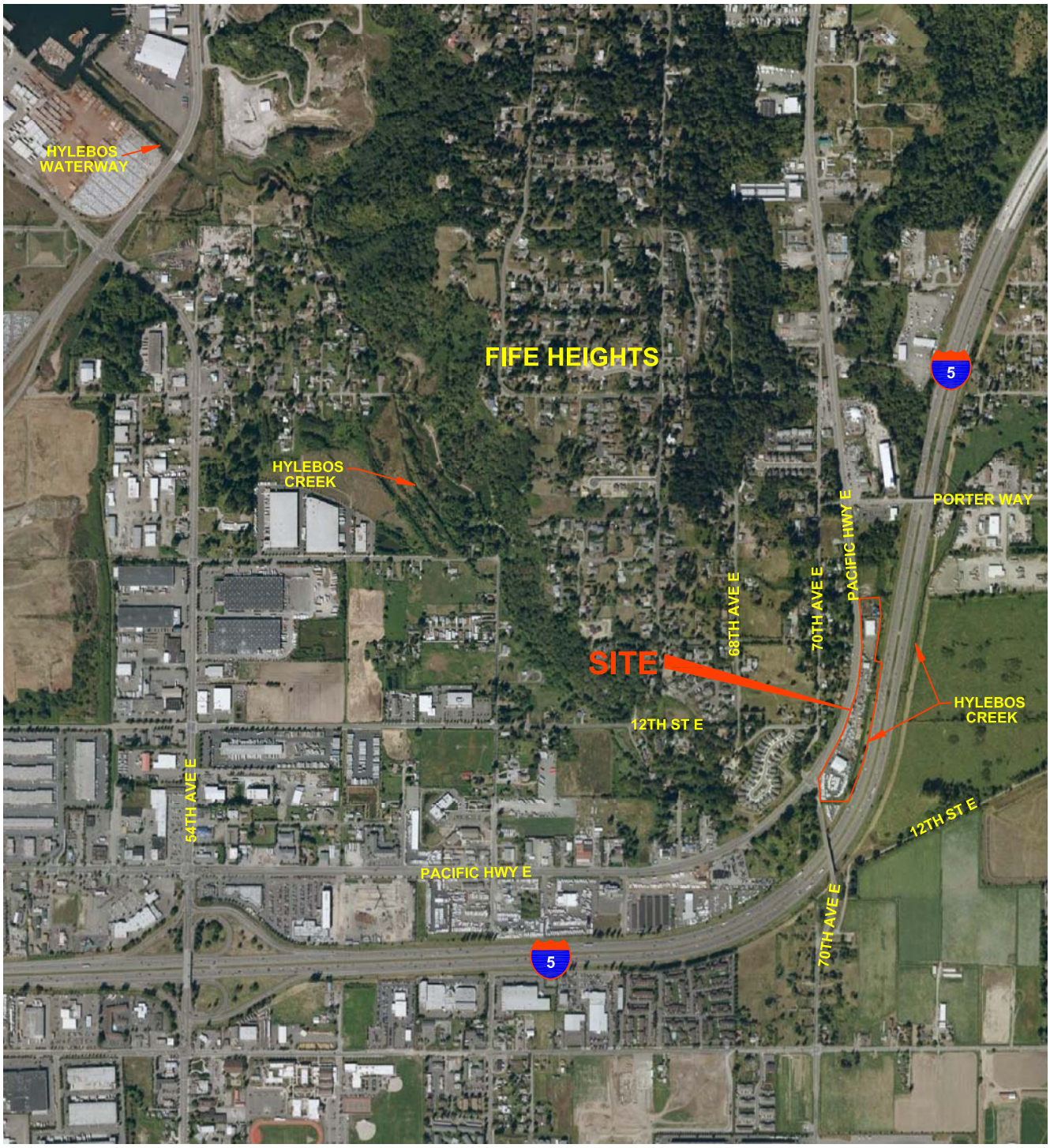
The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: 

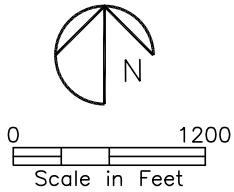
Name of signee Jason Landskron

Position and Agency/Organization Cleanup Project Manager, Ecology

Date Submitted: 7/1/15



Source: GOOGLE EARTH PRO, 2009



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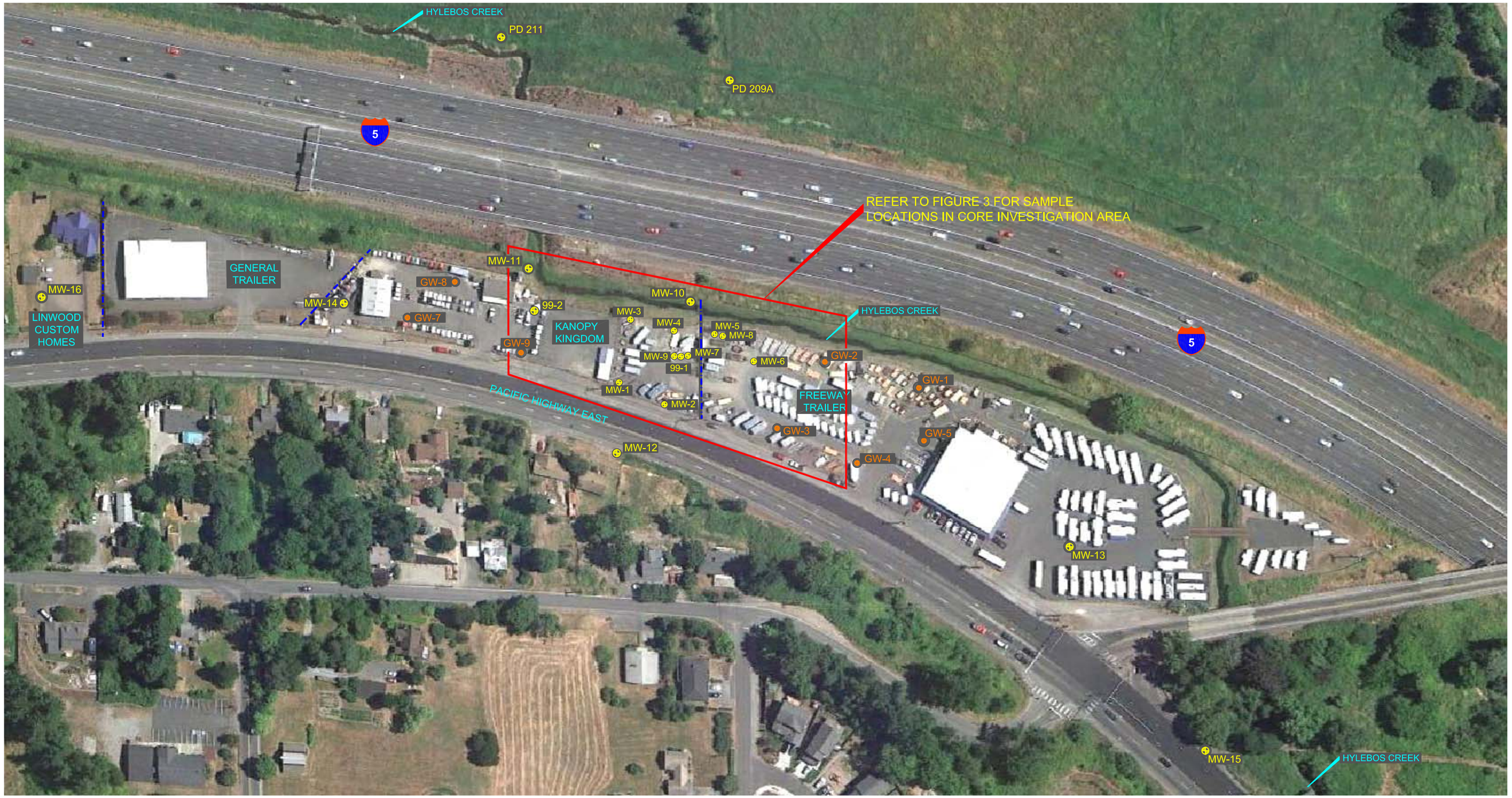
CDM

USG INTERIORS/HIGHWAY 99 SITE
MILTON, WASHINGTON

Figure No. 1
Vicinity Map



REFERENCE: GOOGLE EARTH PRO, 2012, IMAGE DATE AUGUST 20, 2011

LEGEND:

MW-12 MONITORING WELL

GW-3 PHASE 2 DPT BORING

PROPERTY LINE

NOTE:

MONITORING WELL MW-14 WAS DRILLED AT THE LOCATION OF GW-6

N

1" = 120'

60 0 120

CDM Smith

USG INTERIORS
HIGHWAY 99 SITE
MILTON, WASHINGTON

Figure No. 2
Site Plan

P:\19921\77628\ARSENIC - TASK 8\ ALT-10-RN 11/19/13 09:41 riehlepj XREFS: ARSENIC-11X17BD, ARSENIC-SITEBASE

HYLEBOS CREEK

HYLEBOS CREEK

HYLEBOS CREEK SW 5

KANOPY KINGDOM

KANOPY KINGDOM

FREEWAY TRAILER

GATE

CENTERLINE PACIFIC HIGHWAY E.

SW 2

SW 4

SW 6

MW-1 MW-2 MW-3 MW-4 MW-5 MW-6 MW-7 MW-8 MW-9 MW-10 MW-11 MW-12

99-1 99-2

GP1 GP2 GP3 GP4 GP5 GP6 GP7 GP8 GP9

SED-1C SED-1B SED-2C SED-2B SED-3C SED-3B SED-4C SED-4B SED-5C SED-5B SED-6C SED-6B SED-7C SED-7B

A4 A5 A6 A7 A8 A9 B2 B3 B4 B5 B6 B7 B8 C2 C3 C4 C5 C7 C8 C9 C10 D1 D2 D3 D4 D5 D6 D7 D8 D9 E3 E4 E5 E6 E7 E8

LEGEND

- MW-7 MONITORING WELL LOCATION
- A9 SOIL BORING LOCATION
- GP6 PHASE 1 DPT BORING JUNE 2006
- SED-6C SEDIMENT SAMPLE LOCATION
- SW 6 SURFACE WATER SAMPLE
- E8 SURFACE SOIL SAMPLE LOCATION
- FENCE
- PROPERTY LINE
- SEDIMENT REMOVAL AREA
- SOIL HOT SPOT AREA (ARSENIC ≥ 500 mg/Kg)
- ENGINEERED PERMEABLE CAP
- DPT BORING LOCATION
- GEOPROBE LOCATION
- MW REMOVED
- MW REMOVED AND REPLACED
- OXIDATION COMPOUND INJECTION TRENCH
- INJECTION OF OXIDATION COMPOUND INTO GROUNDWATER HOT SPOT
- IN-SITU SOLIDIFICATION OF SOIL HOT SPOT

N

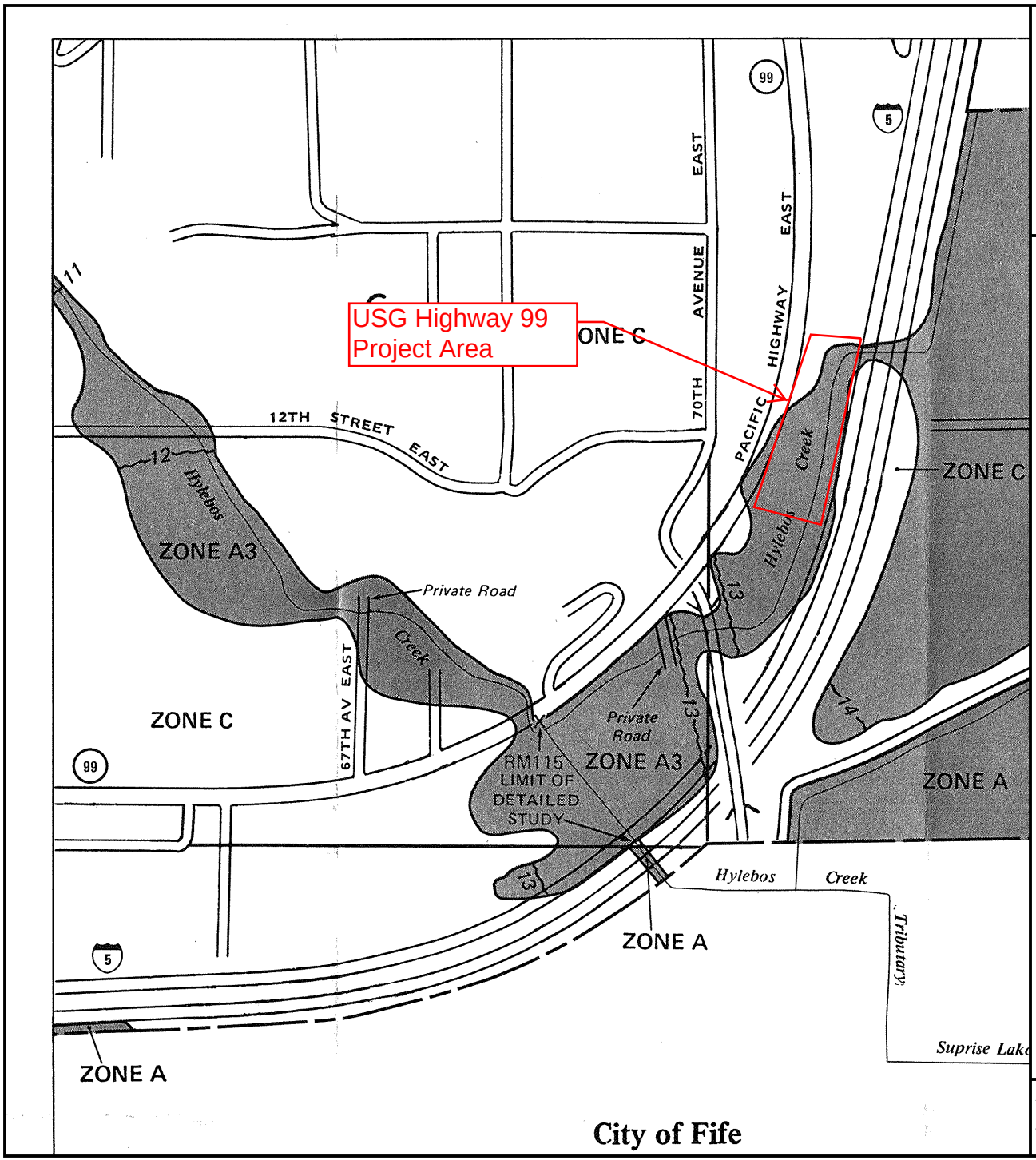
1" = 40'

20 0 40

CDM Smith

USG INTERIORS/HIGHWAY 99 SITE
MILTON, WASHINGTON

Figure No. 10
Alternative 2



APPROXIMATE SCALE

500 0 500 FEET

NATIONAL FLOOD INSURANCE PROGRAM

FIRM

FLOOD INSURANCE RATE MAP

PIERCE COUNTY, WASHINGTON

(UNINCORPORATED AREAS)

PANEL 327 OF 1375

(SEE MAP INDEX FOR PANELS NOT PRINTED)

COMMUNITY-PANEL NUMBER
530138 0327 C

EFFECTIVE DATE:
AUGUST 19, 1987

Federal Emergency Management Agency