

# INTEROFFICE COMMUNICATION

CORPORATE ENVIRONMENTAL

June 25, 2004

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FROM: V. L. ZumBrunnen

SUBJECT: Renton Superfund Site  
South 40 Environmental Requirements for Site Development

As you requested, the following contains general environmental requirements that should be considered for proposed renovation, redevelopment or any new construction on the Renton Superfund Site. Attached is the current site map.

The boundaries of the Renton Superfund Site are North 4<sup>th</sup> to North 8<sup>th</sup> and Houser Way to Garden Avenue North which current includes the Kenworth Truck facility, Kenworth R&D and Active Transport (aka Dallas Mavis). An additional parcel adjacent, but not PACCAR property, is located between North 6<sup>th</sup> and North 8<sup>th</sup> along Garden Avenue North. The Department of Ecology (DOE) has outlined the protection and maintenance of the site cap in a Consent Decree dated October 17, 1991 and amended in August 19, 1994 for this site. The Corporate Environmental Department (CED) is the department of record and should be contacted regarding any proposed plans in the initial stages of design of a project that could impact the soil cap.

CED must review any proposed plans for this site for compliance with the Consent Decree and Restrictive Covenants set forth as well as assist with addressing any environmental issues for new facilities or changes to an existing facility. Due to the condition of the soil at Renton, any plans including structural changes or soil work must be reviewed by CED. Containment cell locations could restrict areas of construction. Proposed construction must improve the capped areas to equal or better condition. Additional general environmental requirements include notification to Ecology of any construction prior to build, 24 to 80-hour HazWoper trained workers depending upon work performed and general protection of capped areas even outside of the immediate construction area.

Access to the South 40 property is currently restricted due to the condition of the soil and the related concerns for the capped areas. As a result, CED must be notified of any onsite visitation or work by others. This includes, but is not limited to, landscapers and any precursory crews such as land surveyors, utility locators, and geotech work. Any proposed use of the South 40 acreage including parking areas must be reviewed and approved by CED to ensure compliance with the Consent Decree.

CED must approve any new land surveys and utility easements proposed for the site. Current land survey information is available upon request. Utility easements will be reviewed for content and will include PACCAR's Superfund verbiage provided by the Law Department.

Any proposed construction on the South 40 would need to be fenced off to protect other undeveloped capped areas. A construction entrance would need to be installed in the current fencing to allow direct access to the proposed construction areas to avoid damage to the neighboring capped landscape. Acceptable repair and/or replacement of any disturbed capped areas will be required within the scope of the project. It may also be necessary to retain services of an environmental consultant if sampling and/or review of the impact to the existing drainage/groundwork plan is of concern. The costs for the above activities will be charged to the project budget.

Perhaps the most important issue is the impact on the Aquifer Protection Zone (APZ) which dissects the South 40 acres. The City of Renton (Renton) has designated a portion of this area as an APZ 2 area (See attached map). As a result, Renton has restricted reuse of the property for hazardous waste surface impoundment, waste piles, recycling facilities, hazardous waste treatment and storage facilities, solid waste landfills, transfer stations and/or petroleum product pipelines.

Attached are 15 basic environmental requirements outlined for subsurface work performed within the Renton Superfund Site boundaries. These 15 environmental requirements will be followed for any proposed construction. The costs for these activities will be charged to the project budget.

In addition to the environmental issues relating to the Consent Decree for this site, Renton has an Environmental Review Checklist addressing traffic/land impacts, stormwater, geotech information and other project specific information. They look at zoning and the end use business at the site. Renton looks at the type of pilings allowed in that area, does inspections and/or sampling, and advises on stormwater routings. The Corporate Facilities Department will assist in the preparation of this checklist. Renton approvals are required and should be included in the material provided to CED for review.

Please contact Vicki ZumBrunnen in the Corporate Environmental Department for further information concerning environmental issues or requirements for the PACCAR Renton Superfund Site.

Attachments  
pdsenvrqmts.doc

## Environmental requirements for the Renton Superfund Site

Costs for compliance with these requirements must be charged to the redevelopment project budget.

1. Both soil and groundwater may be contaminated and thus grading, excavation or trenching of soil below the minimum 12 " structural cap must be conducted by a contractor that is trained and conducts the work in accordance with WAC 296-62-300, Hazardous Waste Operations and Emergency Response. A Health and Safety Plan will be needed. See attached Health and Safety Requirements applicable to any work performed below the level of the structural cap.
2. Soils greater than 12" in depth must be assumed to be contaminated. If the site soil is visibly clean and can be re-used on-site it must be stockpiled in a manner that prevents dust and stormwater contact including plastic sheeting underneath, and a cover each evening and during weather conditions that may result in dust or stormwater impacts. Berms should be used to avoid excessive stormwater contact with potentially contaminated soil. Erosion, stormwater and dust control plans will be needed. If the potentially contaminated but visibly clean soil is not re-used on-site, the soil stockpiles must be sampled with a 5-point composite sample for each individual stockpile or for each 500 cubic yards within a single stockpile, whichever is more, and tested for proper disposal. Soil stockpiles should be segregated in a manner that prevents contamination of clean soil and minimizes disposal costs. CED must pre-approve the disposal site(s). Copies of all test results, shipping papers and the final disposal site must be provided to CED. Off-site disposal of more than 200 cubic yards of potentially contaminated soil in any 3 month period must be pre-approved by CED and Ecology.
3. If visibly contaminated soil, debris or groundwater is encountered, CED should be notified immediately. With approval from CED, proceed with Hot Spot Removal Action (HSRA) for visibly contaminated soil as detailed in Item 15. Removed groundwater should be stored in a portable Baker tank. Visibly contaminated debris must be stockpiled on plastic and covered each evening or if weather conditions are such that wind or stormwater could contact and mobilize any contaminated soil that is adhering to the debris. Berms should be used to prevent excessive contact of stormwater runoff with potentially contaminated debris.
4. Backfilling is allowable with either clean imported fill or visibly clean site soils. However, unless testing is performed to confirm that the visibly clean site soils meet MTCA clean-up levels, the site soil backfill must be covered with a minimum 12 " of clean imported backfill even under buildings or paved areas. Where the structural cap is disturbed it must be repaired or replaced to a minimum depth of 12 ", even under buildings or paved areas.
5. Excavations and trenches that may require future access for maintenance or repairs such as stormdrains or utility trenches must be lined with a geotextile as a marker and backfilled with clean imported fill.
6. Avoid collecting excessive stormwater in trenches and excavations with berms and other surface water diversions.
7. Contact CED if free-product or a sheen is visible in any encountered groundwater. With verbal approval from CED, collect the free-product or sheen with absorbent materials and properly dispose.

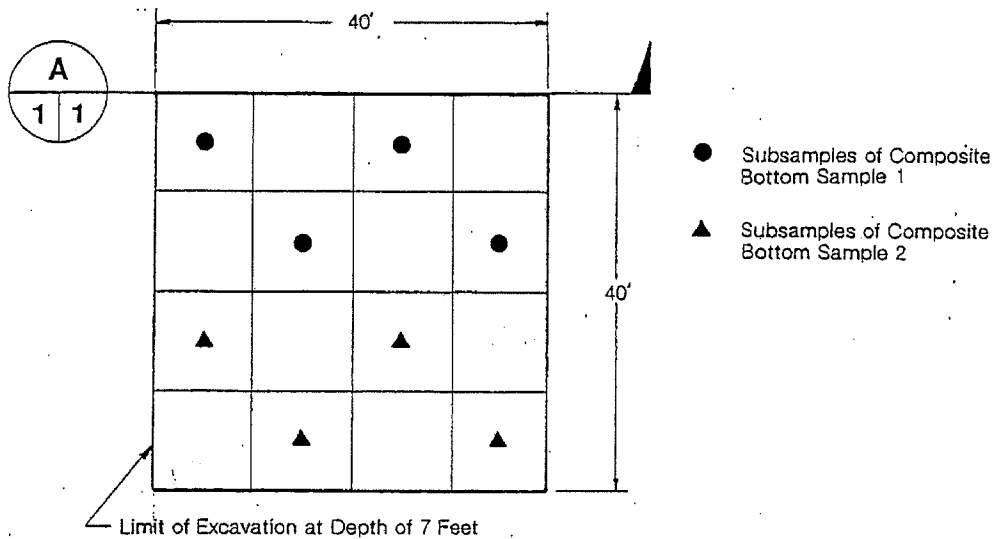
8. Potentially impacted soils and groundwater must not be stored south of the Aquifer Protection Zone. See attached Figure 2.
9. The dust control plan must include dust control measures such as water spaying for all operations that could generate dust. No visible dust is allowed.
10. A soil erosion plan is required to prevent erosion due to stormwater runoff or run-on from excavations, stockpiles, graded areas or other exposed site soils. Measures such as berms, straw bails, plastic covers and other means must be taken to control soil erosion.
11. Measures must be taken to protect site groundwater monitoring wells. CED must be notified of any well damage. The contractor shall be required to properly abandon and replace to meet or exceed original conditions, any damaged wells.
12. Site access shall be limited. No access will be allowed to the other parts of the PDS Superfund site. Any damage to the structural cap will be the responsibility of the contractor. If the existing access gate and road are damaged or removed the contractor will be asked to replace to meet existing conditions or better.
13. Site equipment that contacts potentially contaminated soil must be washed prior to leaving the site. Wash water must be collected for proper disposal.
14. Sales tax exemptions apply to remediation projects in Washington State under some circumstances. The contractor should be asked to apply for any application sales tax exemptions if remediation efforts such as disposal of contaminated soil or groundwater are required. The contractor may need a copy of the Consent Decree in applying for sales tax exemptions. PACCAR will make copies of the Consent Decree available upon request.
15. Hot Spot Removal Action (HSRA): If visibly contaminated soil is encountered a representative sample should be taken and analyzed for the Hot spot Action Levels (HSAL) provided below in accordance with the EDR Vol C.:

Soil Constituent	HSAL (mg/kg)	Prep Method	Analytical Method
TPH	2,500	SW 3550	EPA 8015 Modified
CPAH	100	SW 3550	EPA 8310
Lead	3,000	SW 3050	EPA 6010
Chromium	600	SW 3050	EPA 6010
Arsenic	100	SW 3050	EPA 6010
PCB	7	SW 3580	EPA 8080

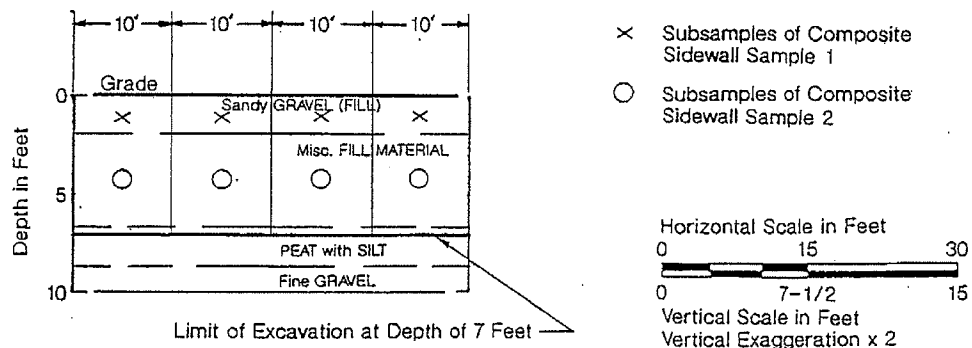
If any of the HSAL are exceeded the soil must be excavated and properly disposed off-site. Excavate until visible contamination has been removed and then confirm residual (not excavated) soils are below the HSAL. Confirmational soil samples must be taken from the bottom and sidewalls of the excavation as shown in Figure 1. Hot spots will be sampled on a 10 foot grid. One four point composite sample will be taken for each 800 square foot excavated bottom. One four point composite sample will also be taken for each 40 linear feet of side wall per layer of strata. Subsamples will be collected at midpoints of the strata. If the composite samples exceed a HSAL then excavation will continue until confirmational samples are below HSAL. However, excavations will not be continued vertically below an underlying protective silt layer.

Pending disposal all soils exceeding HSAL must be stored in bermed, lined and covered stockpiles such that wind or stormwater will not contact and mobilize the contaminated soil. Berms should be used to prevent excessive contact of stormwater runoff with contaminated soil stockpiles. Soil stockpiles should be segregated in a manner that prevents contamination of clean soil and minimizes disposal costs. For disposal purposes, a 5 point composite sample will be taken for every 500 cubic yards of stockpiled soil. CED must pre-approve disposal sites. Copies of the shipping papers (manifests) test results, and disposal location must be provided to CED. Pre-approval from CED and Ecology is required for off-site disposal of greater than 200 cubic yards in any three-month period. Proper storage on-site is required prior to disposal.

# Hot Spot Excavation Sampling Plan for Soil Quality Performance Sampling



**Plan View of Typical Excavation Area**



**Cross Section A**

**HARTCROWSER**  
J-1639-20 8/91  
Figure 1