1011 SW Klickitat Way, Suite 107
Seattle, WA 98134

September 14, 2020

Tamara Welty
Site Manager, Washington Department of Ecology
Toxics Cleanup Program, Northwest Regional Office
3190 160th Avenue Southeast
Bellevue, WA 98008

Via email to:

tamara.welty@ecy.wa.gov

Re: Soil Management Plan, Snyder Roofing, Snohomish, Washington
Facility Site ID # 26294569

DH Environmental, Inc. (DH Environmental) has prepared this plan to describe the soil management procedures associated with the installation of a small utility vault located at 20203 Broadway Ave., in Snohomish County (Snohomish County parcel number 27052400100400), as shown on Figure 1 (Property).

A restrictive covenant has been recorded on the Property (200008010278, 8/1/2000, Snohomish County) due to the potential presence of petroleum hydrocarbons in soil. Gasoline-, diesel-, and oil-range hydrocarbons are believed to be present in soil on the property at concentrations greater than Model Toxics Control Act (MTCA; Washington Administrative Code [WAC] 173-340) industrial soil cleanup levels. It should be noted that the presence of contamination is assumed, and that no specific remaining contamination has been identified (Ecology, 2016 [(1)]).

The restrictive covenant specifies several conditions on the property relevant to the utility vault replacement work:

- Ecology shall be notified within 30-days in the event any subsurface materials are disturbed (Section 1, number 1).
- Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology (Section 3).

The ownership and use of the property will not be affected by this project, and the property condition will not change.

The following sections describe the work and how soils will be managed during the course of the project.

---

[1] Ecology, 2016. Periodic Review; Hendel Property, Aka Snyder Roofing; Facility Site Id#: 26294569; 20203 Broadway Avenue, Snohomish, Washington. Northwest Region Office, Toxics Cleanup Program. August.

Description of the Work

CableCom, LLC (CableCom) plans to replace an existing subsurface utility vault on the Property with a new utility vault. The new utility vault is 1.5-feet wide x 2-feet long by approximately 3- feet deep, and it will replace an existing vault that is 1-feet wide x 1.5-feet long. As a part of the replacement, it may be necessary to remove a small volume of soil from around the existing vault in order to install the new vault. The work is tentatively scheduled to occur in October 2020, pending Ecology approval.

Work Location

The utility vault scheduled for replacement is located in the far northwest corner of the Property, along the northern property boundary and approximately 30-feet east of the northwest property corner. The vault is located in a narrow planting strip of exposed soil and vegetation. The maximum expected depth of soil removal, if required, is approximately 3-feet.

It is unknown whether hydrocarbons that are assumed to be present in fill soils across the Property are present in this area. Therefore, the soil will be properly sampled, characterized, and handled as described in this Soil Management Plan, to ensure no potentially hazardous substances are exposed to the environment during the vault replacement work.

Soil Sampling and Waste Designation

Prior to replacing the vault, a soil sample will be collected from a minimum of three locations adjacent to and beneath the existing vault. The soil samples will be collected using hand tools (shovels, hand augers, or similar), by properly trained personnel. Each sample will be screened in the field for evidence of petroleum contamination using a combination of visual (staining, sheen, etc.), olfactory (odor), and photoionization detector (PID) screening methods. The soil exhibiting the greatest potential to be impacted by petroleum will be retained for laboratory analysis. If no soil appears to be impacted based on the results of field screening, the soil sample will consist of a composite sample comprised of soil beneath and adjacent to the existing vault.

The soil sample will be placed directly into laboratory supplied sampling jars, labeled with the sample identification and date and time of collection, and it will be placed into an iced cooler for delivery to the lab following chain of custody protocols. The sample will be submitted to Onsite Environmental of Redmond, Washington, a Washington State accredited environmental lab, for analysis of the following compounds:

- Gasoline-range hydrocarbons by Method NWTPH-Gx,
- Diesel- and lube oil-range hydrocarbons by Method NWTPH-Dx,
- Benzene, toluene, ethylbenzene, and xylenes (BTEX), by EPA Method 8021,
- Polychlorinated biphenyls (PCBs) by EPA Method 8082, and
- the Resource Conservation and Recovery Act (RCRA) list of eight metals ("RCRA 8 metals"; arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver), plus copper, nickel, and zinc.

Analysis for hydrocarbons will be conducted because they are a known contaminant of concern at the Property. Analysis for BTEX, PCBs, and metals will be used to designate the soil in accordance with the Washington State Dangerous Waste regulations (WAC 173-303-070). The data and designation will then be used to profile the waste for disposal at a properly permitted disposal facility, based on the results of soil sampling.

Soil Handling and Disposal

Waste designation soil sampling will be conducted by HAZWOPER trained personnel, and by, or under the direct oversight of, a Washington State licensed geologist. The subsequent designation of the soil in accordance with WAC 173-303-070 will determine whether the soil is potentially hazardous, and where the soil can be disposed of.

If soil must be removed from around the edge of the vault, the soil will be removed by hand tools or using a vacuum truck to avoid damaging underground utilities. It is expected that potential soil removal will be minimal (less than 1 cubic yard). Operators will have training appropriate for the level of hazard in the soil, based on the waste designation soil sampling results. All soil removed from the Property will be directly transported to a properly permitted disposal facility (based on the results of the waste designation sampling). The load will be tracked on a bill of lading or shipping manifest, and a copy will be retained and submitted as part of the final project record.

Because the vault is located in an open area with exposed surface soil and vegetation (i.e., no cap), it is expected that site restoration will be minimal. Soil will only be removed as required to install the new vault. Once the vault is installed, the ground surface will be raked smooth to restore the original grade.

Reporting

Following replacement of the vault, a short letter report will be prepared documenting the results of the waste designation sampling and describing any soil removal and offsite disposal. Any soil disposal records will be included in the report, and a copy will be submitted to Ecology upon completion of the work.

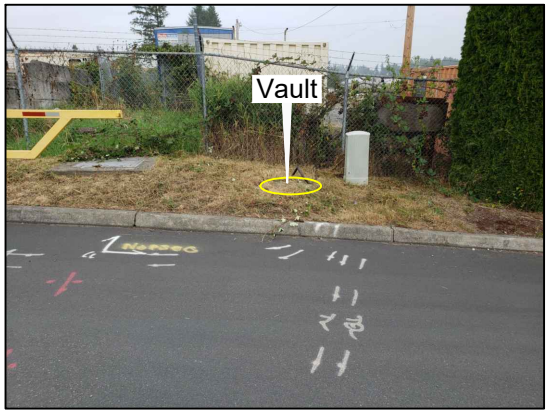
Please contact us if you have any questions regarding this report.

Sincerely,

Nathan Moxley, LG, LHG
DH Environmental, Inc.

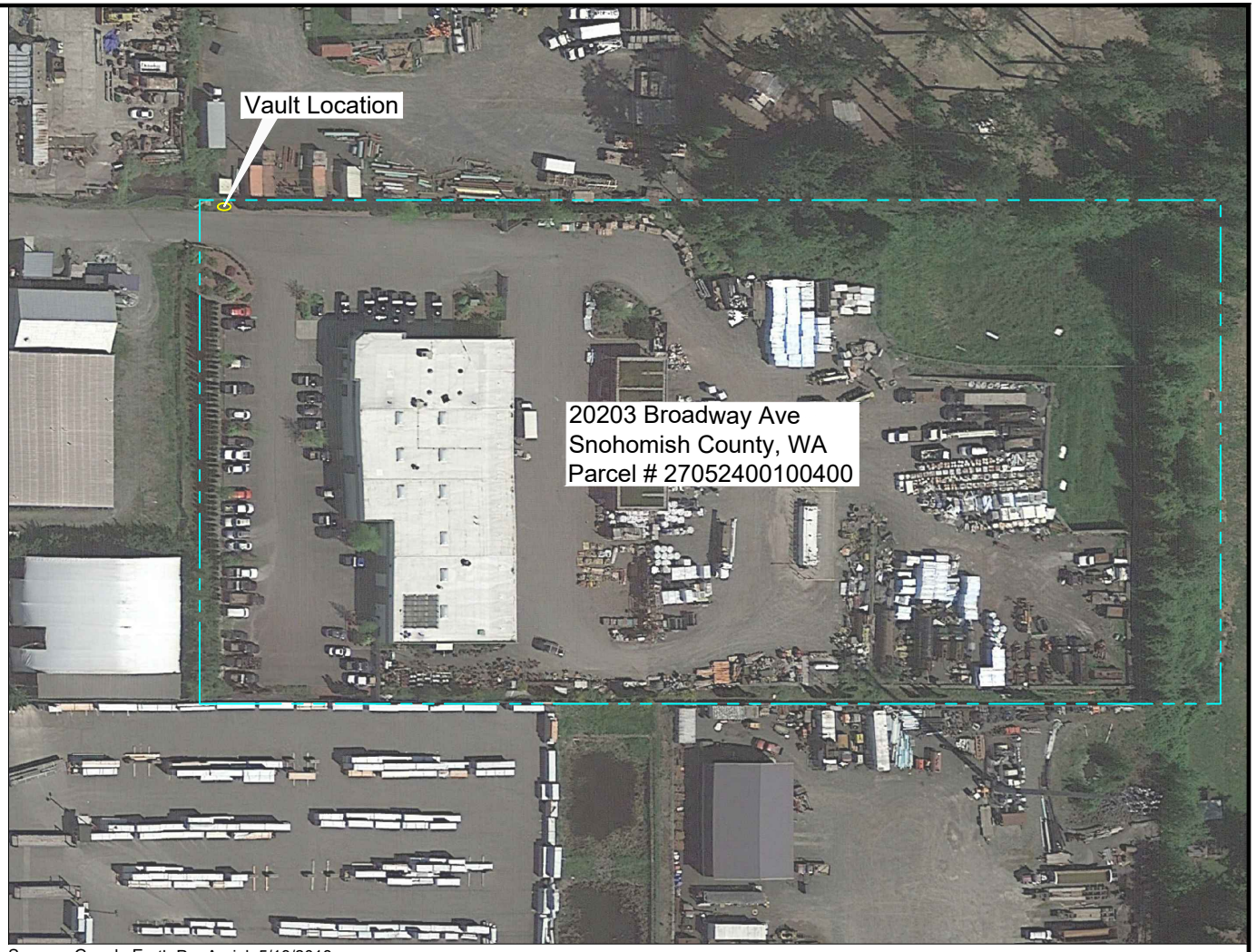
Enclosures

Figure 1 Site Map



Vault Location, looking North

Looking Inside Vault



Source: Google Earth Pro Aerial, 5/13/2018

SITE LOCATION

N

LEGEND

Approximate Parcel Line

0 60 120

Scale in Feet

DH Environmental Inc

Site Location Map

CableCom 20203 Broadway Ave Snohomish County, WA	09-17-2020	Figure 1