

# 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 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:***

Please adjust the format of this template as needed. 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:***

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the [SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS \(part D\)](#). Please completely answer 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. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

## **A. Background**

### **1. Name of proposed project, if applicable:**

Interim Action – 8801 East Marginal Way South

### **2. Name of applicant:**

PACCAR Inc

### **3. Address and phone number of applicant and contact person:**

Applicant: Mr. Brian Haderlie  
PACCAR Inc  
PACCAR Building  
777 106<sup>th</sup> Avenue NE  
Bellevue, WA 98004  
(425) 468-7055

Contact: Ms. Meg Strong  
Shannon & Wilson, Inc.  
400 North 34th Street, Suite 100  
Seattle, WA 98103  
(206) 695-6787

### **4. Date checklist prepared:**

December \_\_, 2020

### **5. Agency requesting checklist:**

Washington Department of Ecology – Toxics Cleanup Program NWRO

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

The project that is the subject of this SEPA checklist (Project) consists of remedial actions to be performed under the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW, at the property located at 8801 East Marginal Way, Seattle, Washington (8801 property). The remedial actions are described in a Feasibility Study (FS), Interim Action Work Plan (IAWP), and an Addendum to the FS and IAWP (Addendum). PACCAR has submitted the FS, IAWP, and Addendum to Ecology.

The 8801 property is part of a MTCA cleanup site known as the “8801 site,” which spans the 8801 property and the adjoining sediments in the Lower Duwamish Waterway (LDW). The 8801 site is subject to two separate agreed orders: Agreed Order No. 6069 applies to the 8801 property and Agreed Order No. 3599 applies to the adjoining sediments.

Implementation of the Project will commence after Ecology approves the FS, IAWP, Addendum, and associated engineering design reports. PACCAR has submitted the FS, IAWP, Addendum, and certain engineering design reports to Ecology. The remaining engineering design reports are in development and will be submitted to Ecology in late 2020 and the first few weeks of 2021. PACCAR anticipates it will take about one calendar year to complete the Project after it commences.

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

The Project consists only of the remedial actions described in the FS, IAWP, and Addendum. A separate project is planned by CenterPoint 8801 Marginal LLC (CenterPoint), the current owner of the 8801 property. CenterPoint's project consists of demolition of most existing structures and construction of a new warehouse and associated improvements on the 8801 property, including landscaping of a river buffer along the shoreline of the 8801 property. The river buffer is 100-feet wide and is measured landward from the ordinary high water mark of the LDW. The City of Tukwila is overseeing the SEPA analysis for CenterPoint's development project under a separate checklist. CenterPoint's development project is consistent with the applicable components and requirements of the FS, IAWP, and Addendum.

A separate cleanup project is underway for a 5-mile stretch of the LDW, including the sediments that adjoin the 8801 property. The U.S. Environmental Protection Agency (EPA) has designated this portion of the LDW as a federal Superfund site. The Record of Decision (ROD) for the LDW Superfund site was issued in November 2014 (EPA, 2014). The remedy for the sediment portion of the 8801 site is prescribed in the ROD. Dredging and enhanced monitored natural recovery have been selected as the remedy for the sediment portion of the 8801 site. The remedy for the sediment portion of the 8801 site will not be implemented until after completion of remedial design for the LDW Superfund site, which is estimated to be in 2024. A pilot test is being implemented to determine the effectiveness of enhanced monitored natural recovery in the stretch of the LDW that includes the sediment portion of the 8801 site. The scope and details of the sediment remedy could change depending on the results of the pilot test, and remedial design will likely not begin until the pilot test is over. The remedy for the sediment portion of the 8801 site is not part of the Project and is not addressed in this SEPA checklist.

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

Amec Earth & Environmental, Inc. (Amec), 2011, Final remedial investigation report, 8801 East Marginal Way South, Tukwila, Washington, agreed order number 6069: Report prepared by Amec Earth & Environmental, Inc., Bothell, Wash., 9-915-14995-L, for PACCAR Inc., Bellevue, Wash., March 18.

Amec Environment & Infrastructure, Inc. (Amec), 2013, Ecology review - final focused feasibility study, 8801 East Marginal Way South, Tukwila, Washington, agreed order no. 6069: Report prepared by Amec Earth & Environmental, Inc., Bothell, Wash., 9-915-14995-L, for PACCAR Inc., May 30.

Anchor Environmental, LLC (Anchor), 2008a, Evaluation of tidal influence on groundwater elevations at 8801 Marginal Way South: Technical memorandum prepared by Anchor Environmental, L. L. C., Seattle, Wash., for PACCAR Inc, February 14.

Anchor Environmental, LLC (Anchor), 2008b, Phase 2 SEWP surface and subsurface sediment results at 8801 Marginal Way South (draft): Technical memorandum prepared by Anchor Environmental, LLC, Seattle, Wash., for PACCAR Inc, May 12.

Anchor QEA, LLC (Anchor), 2009, Final sediment evaluation data report, 8801 East Marginal Way South property: Report prepared by Anchor QEA, LLC, Seattle, Wash., for PACCAR Inc., Bellevue, Wash., June.

GeoEngineers, Inc. and Kennedy/Jenks/Chilton, 1990, Remedial feasibility assessment, subsurface solvent contamination, north fire aisle, Kenworth Truck manufacturing facility, Tukwila, Washington: Report prepared by GeoEngineers, Inc., Bellevue, Wash., and Kennedy/Jenks/Chilton, for Kenworth Truck Company, May 25.

Geomatrix Consultants Inc. (Geomatrix), 2007, Northwest Corner Affected Soil Removal Report, Former Rhône-Poulenc Site, Tukwila, Washington: Report prepared by Geomatrix Consultants Inc., Seattle, Wash., 8769, for Container Properties LLC. January.

Kennedy/Jenks Consultants (Kennedy/Jenks), 1998, Interim VOC investigation report, 8801 East Marginal Way South, Tukwila, Washington: Report prepared by Kennedy/Jenks Consultants, Federal Way, Wash., K/J 956085.07, for the Kenworth Truck Company, June.

Leidos, Inc. (Leidos), 2016, Technical Memorandum: Potential for PCB contamination from sampling equipment tubing materials: Memorandum prepared by Leidos, Inc., Bothell, Wash., November 23.

Leidos, Inc. (Leidos), 2017, Lower Duwamish Waterway groundwater sampling for PCB congeners and aroclors, data report, final: Report prepared by Leidos, Inc., Bothell, Wash. for the Washington State Department of Ecology, Bellevue, Wash., July.

Shannon & Wilson, Inc., 2020a, Final Feasibility Study, 8801 East Marginal Way South., Tukwila, Washington. Report prepared by Shannon & Wilson, Inc., Seattle, Wash. for PACCAR Inc., July.

Shannon & Wilson, Inc., 2020b, Final Interim Action Work Plan, 8801 East Marginal Way South, Tukwila, Washington. Report prepared by Shannon & Wilson, Inc., Seattle, Wash. for PACCAR Inc., July.

Shannon & Wilson, Inc., 2020c, Final Addendum to the Interim Action Work Plan and Feasibility Study, 8801 East Marginal Way South, Tukwila, Washington. Report prepared by Shannon & Wilson, Inc., Seattle, Wash. for PACCAR Inc., December.

Stell, 2019, Cultural Resources Review for 8801 East Marginal Way South, King County, Washington. Report prepared by Stell for Shannon & Wilson, Seattle, Wash., March.

U.S. Environmental Protection Agency (EPA), 2014, Record of decision, Lower Duwamish Waterway superfund site: Seattle, Wash., U.S. Environmental Protection Agency Region 10, November.

U.S. Fish and Wildlife Service, 2020, Information for Planning and Consultation (IPaC) resources list. Downloaded from <https://ecos.fws.gov/ipac/>, 11 December 2020.

Washington State Department of Ecology (Ecology), 2018, Lower Duwamish Waterway preliminary cleanup level workbook, supplemental information (PCUL document): Washington State Department of Ecology, 54 p., December.

Windward Environmental, LLC (Windward), 2011, Stormwater system investigation – final report, Insurance Auto Auctions, 8801 E Marginal Way S, Tukwila, Washington: Report prepared by Windward Environmental, LLC, Seattle, Wash., for Washington State Department of Ecology, Bellevue, Wash., May 20.

**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.**

A SEPA checklist has been submitted by CenterPoint to the City of Tukwila for its development project. CenterPoint's development project will be consistent with the applicable components and requirements of the FS, IAWP, and Addendum.

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

The Project will be conducted under the authority of the agreed order that covers the 8801 property. As such, the Project is exempt under RCW 70A.305.090(1) from the procedural requirements of certain state statutes and the procedural requirements of any laws requiring or authorizing local government permits or approvals for the remedial actions. But the Project must comply with the substantive provisions of such state statutes and laws. Based on the exemption in RCW 70A.305.090(1), no government approvals or permits are required for the Project, but the Project will comply with the substantive provisions of applicable statutes, laws, and regulations.

**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 Project consists of various remedial actions to address contaminated soil and groundwater at the 8801 property and to mitigate the risk of contaminated vapors intruding into the new warehouse CenterPoint plans to construct on the 8801 property. The primary contaminants of concern in soil and groundwater, and their locations on the 8801 property, are as follows:

Soil

- Halogenated volatile organic compounds (VOCs) including trichloroethene (TCE) and vinyl chloride in the north and west portions of the 8801 property
- Carcinogenic polyaromatic hydrocarbons (cPAHs) west of the existing warehouse
- Polychlorinated biphenyls (PCBs) in the southwest portion of the 8801 property
- Arsenic on the east side of the existing warehouse
- Gasoline-range hydrocarbons to the south of the existing warehouse

Groundwater

- Halogenated VOCs in the north and west portions of the 8801 property.
- Gasoline-range, diesel- range, and oil-range hydrocarbons in the northwest corner of the 8801 property
- Vinyl chloride in the northwest corner of the 8801 property
- PCBs in the northeast portions of the 8801 property
- Copper on the west side of the 8801 property
- Bis(2-ethylhexyl)phthalate, a semi-volatile organic compound, in various locations

The proposed remedial actions are primarily focused on soil and groundwater and reducing the impact of the halogenated VOCs on indoor air. Soil and groundwater cleanup levels (CULs) are designed to protect human and ecological health by protecting the surface water and sediments of the LDW. Remediation levels are proposed to meet groundwater CULs at the 8801 property point of compliance located along the western edge of the 8801 property, prior to the point at which the groundwater enters the LDW.

The proposed remedial actions include:

### Soil

The remedial actions proposed for soil include: (1) excavation of six areas, referred as hotspots, where chemicals of concern (COCs) exceed remediation levels; (2) installing or maintaining impervious surfaces in areas of the 8801 property where COCs would remain above CULs; and (3) implementation of institutional controls. Soil would be excavated until the remediation levels are achieved. Proposed institutional controls include a deed restriction that would require that the surface covers at the 8801 property (e.g., buildings and other impervious surfaces) be maintained to minimize stormwater infiltration. The remedial actions proposed for soil would reduce a significant mass of COCs in soil and minimize the potential for construction workers to be exposed to the COCs that would remain at the 8801 property.

### Groundwater

The remedial actions proposed for groundwater include: (1) excavation of TCE-contaminated soil near the northern boundary of the 8801 property; (2) excavation of total petroleum hydrocarbons (TPH)-contaminated soil in the northwest corner of the 8801 property; (3) removal of PCB-containing caulking from surface joints in the pavement along the north end of the 8801 property; (3) injection of carbon (an edible and non-toxic emulsified soybean oil mixture) and bacteria to enhance the natural breakdown of halogenated VOCs and TPH in the northern portion of the 8801 property; (4) extension of the existing groundwater air sparge/soil vapor extraction (AS/SVE) system to the west of its current alignment, and (5) allowing natural degradation processes to continue between the area of injection and the AS/SVE system. Ongoing monitoring would be undertaken following remedial actions and additional contingencies implemented, if necessary. Institutional controls in the form of a deed restriction would be implemented to ensure that groundwater is not used for drinking water.

### Indoor Air

CenterPoint's new warehouse would be constructed over a portion of the halogenated VOC groundwater plume. In order to protect the occupants of the new warehouse from contaminated vapors, a sub-slab depressurization system is proposed beneath the western portion of the warehouse.

- 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.**

Address: 8801 East Marginal Way South, Tukwila WA 98108.

Parcel #: 542260-0060

Legal Description: MEADOWS THE MCNATTS DC 38 UNREC TR 3 TGW POR TR 2 DAF BEG NE COR SD TR 2 TH W 1574.72 FT TO NW COR TH SELY ALG WLY LN 237.76 FT TH E 1053.10 FT TH S 23-02-00 E 46.03 FT TH E 561.38 FT TO ELY LN TH NWLY 297.03 FT TO BEG LESS RR R/W

TRS: SE ¼ Section 33, Township 24 North, Range 4 East

## **B. Environmental Elements**

### **1. Earth**

#### **a. General description of the site:**

(circle one):  Flat, rolling, hilly, steep slopes, mountainous, other \_\_\_\_\_

The entire 8801 property is paved or covered with buildings except for a few small areas of landscaping around the former administration building at the east end of the 8801 property and the narrow band of vegetation along the waterfront.

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

The 8801 property is relatively flat, with a ground surface elevation of approximately 20 feet above mean sea level. The northern two-thirds of the 8801 property along the waterfront is protected by a vertical sheet-pile wall and the southern two-thirds is protected by steeply sloping riprap (approximately 40 percent).

#### **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 agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.**

Investigations of the 8801 property have documented interbedded silt, sand layers, and lenses consistent with regional geology and deposits in a meandering river valley. The LDW river valley typically consists of low- to moderate- permeability shallow alluvial deposits composed of stratified silt, clay, silty sand, sand, and occasional layers of peat. The alluvial deposits have been sourced from eroded soil and volcanic debris from Mount Rainier and have been deposited in association with organic material in the river system. The LDW channel has been modified by human activity, which introduced large amounts of sand, silt, and gravel related to channel alterations.

Fill material underlies paved surfaces and is up to 10 feet thick in some locations. Fill materials include gravelly structural fill beneath buildings and paved areas, poorly graded sand to silty sand fill deposits, and gravelly backfill materials in areas that had historically been excavated.

Fill material at the 8801 property is underlain by a layer of fine-grained material, including silt, sandy silt, and silty sand that extends to a depth of 5 to 15 feet below ground surface (bgs). This fine-grained material layer appears to be laterally continuous in the

western portion of the 8801 property but contains lenses of silty sand in the central and eastern portions. A poorly graded sand layer, which typically contains less than 10 percent silt, is generally present beneath the fine-grained layer beginning at 10 to 15 feet bgs, although at some locations it is present immediately beneath the pavement surface or the fill material. This layer locally contains thin lenses of silty sand or silt. A layer of fine-grained materials, consisting mainly of silt and silty sand, is typically present beneath the poorly graded sandy layer at depths of approximately 30 to 50 feet bgs.

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

There are no known indicators or history of unstable soils at the 8801 property. Immediately waterward of the armored shoreline and extending west and upstream/downstream are King County-mapped erosion hazard areas.

**e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.**

The proposed remedial actions for soil include excavation of six hotspot areas, totaling approximately 16,000 square feet (about 4 percent of the 8801 property). The excavations would range in depth from approximately 2.5 to 12 feet bgs and would remove a total of approximately 9,000 tons of contaminated soil. The soil that would be excavated has been classified as non-hazardous waste based on previous sample results. The excavated soil would be loaded directly, if feasible, into a dump truck for transport to a permitted disposal facility. Excavated saturated soil may require stabilization or dewatering prior to loading for offsite disposal. The excavations would be backfilled with compacted inert fill (the source of the fill would be determined during the design phase and would be tested to ensure it is clean), and the ground surface would be restored to pre-excavation conditions, consisting of a 6-inch surface cap of asphalt except along the 100-foot river buffer where a clay cap would be placed.

The proposed remedial actions for groundwater include excavation of TCE-contaminated soil from an area totaling approximately 5,700 square feet (less than 1 percent of the 8801 property) and TPH-contaminated soil from an area totaling approximately 200 square feet (less than 1 percent of the 8801 property). The TCE excavation would extend to approximately 4 feet bgs (this depth may be extended to groundwater to allow for additional removal of TCE-contaminated soil if base or sidewalls contain noticeable TCE odors) and the TPH excavation would extend to approximately 10 feet bgs. The excavated soil would be loaded directly, if feasible, into a dump truck for transport to a permitted disposal facility. The excavations are expected to remove approximately 1,377 tons of contaminated soil that would be disposed of as non-hazardous waste at a Subtitle D landfill. Approximately 96 tons of the soil may be disposed of as hazardous waste at a Subtitle C landfill. Excavated saturated soil may require stabilization or dewatering prior to loading for offsite disposal. The proposed remedial actions for groundwater would also result in the disturbance and removal of small amounts of soil associated with expansion of the existing AS/SVE system, which would require trenching for the SVE lines.

The proposed remedial actions include removal of the existing pavement and topsoil from the 100-foot river buffer and replacement with a 1-foot thick imported clay cap (approximately 3,100 cubic yards). The cap would be covered with a drainage blanket and topsoil before landscaping is planted in the river buffer. The placement of topsoil and the planting of landscaping in the river buffer is part of CenterPoint's development project, not



the Project, and is covered by the separate SEPA checklist submitted by CenterPoint to the City of Tukwila.

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

The Project would temporarily expose over one-half acre of ground that is currently paved. Exposed soil could be mobilized by wind or rain. However, the potential for erosion of exposed soils would be limited by implementation of a Project-specific temporary erosion and sediment control plan including standard best management practices (BMPs).

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

About 95 percent of the 8801 property is currently covered with impervious surfaces. Upon completion of the Project and CenterPoint's construction of its separate development project, nearly the same percentage of the 8801 property would be covered with buildings, paving, clay caps, and other impervious surfaces.

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

A Stormwater Pollution Prevention Plan (SWPPP) already exists for the current operations at the 8801 property. The BMPs associated with the SWPPP are required to be maintained by the existing operator and would continue to be utilized during the Project. A temporary erosion and sediment control plan, including BMPs, associated with the excavation work would be established prior to work commencing consistent with the requirements of the 2016 *King County Surface Water Design Manual* adopted by the City of Tukwila.

**2. *Air***

**a. *What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.***

Short-term, temporary air emissions from equipment during construction of the Project, such as vehicle exhaust and possible dust, may occur. The asphalt that would be used to cap the remediation areas could emit toxic fumes for a short duration that can irritate eyes, nose, and lungs, and the asphalt could cause burns and other skin damage if it comes into contact with skin. Construction workers implementing the Project would wear appropriate personal protective equipment and follow the requirements of a health and safety plan to prevent exposure to or contact with asphalt and toxic fumes.

Vapor generated from soil and groundwater contaminated with halogenated VOCs and gasoline at the 8801 property is currently a potential source of contamination to air. The proposed remedial actions would reduce contamination and vapors from current levels resulting in a decrease in potential for air contamination at the 8801 property.

In 2017, calculated contaminant mass flow rates from the current AS/SVE system blower discharge were compared to WAC 173-460-150 contaminant-specific de minimus emission rates, which are defined in the code as "trivial levels of emissions that do not pose a threat to human health or the environment." All contaminant emission rates were

below the listed de minimus emission rates. The Puget Sound Clean Air Agency (PSCAA) confirmed that the AS/SVE system did not require permitting or registration with PSCAA. The proposed expansion of the current AS/SVE system does not include an increase in the effluent flowrate and is not expected to result in increased effluent concentrations. Therefore, emissions from the AS/SVE system following expansion are anticipated to be below de minimus emission rates.

The western portion of the new warehouse proposed by CenterPoint would overlies part of the halogenated VOC groundwater plume. Because the halogenated VOC plume would not be fully remediated before the warehouse is constructed, a sub-slab depressurization system would be installed beneath the western portion of the warehouse to remove the pathway for contaminated vapors to intrude into the building. The sub-slab depressurization system would include a blower that would discharge from the roof of the warehouse. It is anticipated that the emissions from the blower would be below de minimus emission rates.

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

There are no known sources of emissions or odor that may affect the Project.

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

During construction of the Project, standard BMPs would be used to minimize and control vehicle exhaust and dust, such as requiring proper maintenance of construction equipment, avoiding prolonged idling of vehicles, spraying water to minimize dust, and periodically sweeping paved areas as necessary.

The proposed remedial actions would reduce the potential for air quality impacts at the 8801 property.

**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.**

The 8801 property abuts the LDW, which is a year-round river that drains to Elliott Bay in the Puget Sound.

**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, some of the proposed remedial actions for soil and groundwater would take place within 200 feet of the LDW, including excavation, injections, and installation of the AS/SVE system expansion.

- 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.***

No filling or dredging would be conducted waterward of the ordinary high water mark, and the 8801 property does not contain any wetlands or other surface waters.

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

The Project does not require any surface water withdrawals or diversions.

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

The mapped floodway and 100-year floodplain (Zone AE – base flood elevation of 12 feet NAVD88, effective date of August 19, 2020) are generally waterward of the sheet pile bulkhead on the 8801 property, but mapping shows the floodplain and floodway extending onto the 8801 property slightly along the riprapped section of shoreline.

- 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.***

The Project does not involve any discharge of waste materials to surface waters.

**b. Ground Water:**

- 1) ***Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.***

The Project does not involve the withdrawal of groundwater for drinking water purposes.

The Project includes treatment of the halogenated VOC groundwater plume. The treatment would involve the injection of a treatment solution, consisting of carbon (an edible and non-toxic emulsified soybean oil mixture) and bacteria (*Dehalococcoides sp.*), into the groundwater to enhance the natural breakdown of the halogenated VOCs. The injections would occur at an estimated 157 injection points. Each injection is essentially a four-step process consisting of injection of the soybean oil mixture, injection of anaerobic water, injection of the bacteria, and a final injection of anaerobic water.

Extension of the existing groundwater AS/SVE system west of the current alignment would include installation of an additional line of sparging and extraction wells to the west of, and parallel to, the existing wells. The AS/SVE system injects air into the groundwater to allow VOCs to transfer from liquid to a vapor phase which can then be captured; the system also encourages aerobic degradation of organic constituents in the groundwater. No water is injected into the ground as part of this remediation activity.

Groundwater samples would be collected after remedial activities have been initiated to verify that the activities are reducing concentrations of COCs in groundwater. Groundwater sampling would continue after the remediation activities have been completed to extract samples for ongoing performance and compliance monitoring.

- 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.***

No waste materials would be discharged into the ground as part of the Project.

**c. *Water runoff (including stormwater):***

- 1) ***Describe the source of runoff (including stormwater) 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.***

The primary source of runoff at the 8801 property is from stormwater falling on the property's extensive impervious surfaces. Two main storm systems drain the 8801 property and discharge to the LDW through the North Outfall (No. 1) and the Central Outfall (No. 2). Prior to discharge, runoff passes through a stormwater treatment system, including an oil/water separator and filter and cyclone units that remove particulates.

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

The Project involves the removal and treatment of hazardous substances that are already in soil and groundwater. No new hazardous substances or waste materials would be introduced to soil or groundwater. BMPs would be used throughout construction of the Project to prevent the spilling or release of hazardous substances or waste materials.

- 3) ***Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.***

The Project would generally maintain existing drainage patterns on and in the vicinity of the 8801 property. But a clay cap and overlying drainage blanket would be installed below the landscaping proposed by CenterPoint in the 100-foot river buffer. This clay cap would prevent downward infiltration of stormwater in the river buffer in order to protect underlying soils.

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

Through compliance with applicable local and state regulations, the Project has incorporated appropriate and necessary measures to reduce and control runoff during construction of the Project. No additional measures are necessary. If unexpected conditions arise during construction, the contractor would adaptively manage the conditions consistent with the *King County Surface Water Design Manual*.

**4. Plants**

**a. Check the types of vegetation found on the site:**

- deciduous tree: alder, maple, aspen, other (a few unidentified trees around the administration building as part of landscape and one at shoreline edge, possibly weeping willow)
- evergreen tree: fir, cedar, pine, other (a few around the administration building as part of landscape)
- shrubs (invasive Himalayan blackberry, landscape plantings)
- grass (a few maintained areas along East Marginal Way and around the administration building at the east end of the site)
- pasture
- crop or grain
- Orchards, vineyards or other permanent crops.
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation

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

The Project would not disturb any of the limited areas of vegetation.

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

No threatened or endangered plant species are known to be on or near the 8801 property.

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

The Project does not include any expansion or alteration of the existing limited areas of vegetation. CenterPoint's development project, addressed in a separate SEPA checklist, proposes the planting of native landscaping in the 100-foot river buffer.

**e. List all noxious weeds and invasive species known to be on or near the site.**

King County has identified the following Class B (control required) noxious weeds on or adjacent to the site:

- Dalmatian toadflax (Class B)
- Spotted Knapweed (Class B)
- Tansy Ragwort (Class B)
- Diffuse knapweed (Class B)

The narrow band of riparian vegetation along the LDW consists almost entirely of Himalayan blackberry, a Class C (control recommended) weed.

**5. Animals**

**a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.**

birds: hawk, heron, eagle, songbirds, other: waterfowl

mammals: beaver, other: rats, mice, raccoon

fish: salmon, trout

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

Species listed under the Endangered Species Act (ESA) and as Washington Department of Fish and Wildlife Priority Habitats and Species are known to be present in the vicinity of the 8801 property. ESA-listed fish species, including Puget Sound Chinook salmon (*Oncorhynchus tshawytscha*), Puget Sound steelhead (*O. mykiss*), and bull trout (*Salvelinus confluentus*), migrate up and downstream past the 8801 property. Other priority fish species include coho salmon (*O. kisutch*), sockeye salmon (*O. nerka*), pink salmon (*O. gorbuscha*), chum salmon (*O. keta*), and coastal cutthroat trout (*O. clarki*). The LDW is also a priority estuarine habitat.

A U.S. Fish and Wildlife Service Information for Planning and Consultation species report (December 11, 2020) identifies the potential for gray wolf marbled murrelet, streaked horned lark, and yellow-billed cuckoo to be present in the vicinity of the 8801 property. Based on existing habitat conditions on the 8801 property and in the vicinity, only the marbled murrelet is likely to be found in the area and generally only flying over the 8801 property to travel between suitable breeding habitat (mature forest) and foraging habitat (marine waters).

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

The 8801 property lies within the Pacific Flyway, an avian migratory corridor consisting of western coastal areas of South, Central, and North America. Anadromous fish migrate up and downstream in the LDW.

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

The Project would benefit aquatic habitat and the fish and other wildlife that rely on the water in the LDW by removing, treating, and reducing the COCs in soil and groundwater at the 8801 property and minimizing the potential for those COCs to reach the LDW. No fish or wildlife habitats would be affected by the Project and no measures to preserve or enhance wildlife are necessary.

**e. List any invasive animal species known to be on or near the site.**

European starling and house sparrow are likely present near the 8801 property. According to King County's WRIA 9 Habitat-limiting Factors and Reconnaissance Report (2000), three non-native benthic invertebrates may also be present in the LDW: *Grandidierella japonica*, *Sinelobus stanfordi*, and *Nippoleucon hinumensis*.

## 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.**

The completed Project would not require any energy to maintain or operate. The AS/SVE system, powered by electricity, is already installed and functioning. Expansion of the system is not expected to increase electric draw. The proposed sub-slab depressurization system would be wind activated and would not require electricity.

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

No.

- 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:**

No measures are necessary.

## 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.**

Completion of the Project would reduce the potential for persons to come into contact with or be exposed to contamination by removing, treating, and containing the contamination.

During construction of the Project, there are standard risks associated with construction equipment operation, such as accidental spills. In addition, soil and groundwater beneath the pavement at the 8801 property are contaminated with halogenated VOCs, gasoline, lead, arsenic, copper, PCBs, cPAHs, and dioxins/furans. Vapor generated from soil and groundwater contaminated with halogenated VOCs and gasoline at the 8801 property is a potential source of contamination to air. During construction of the Project, construction workers could be exposed to contaminated soil, groundwater, or vapors. For this reason, only appropriately-trained individuals would be utilized to construct the Project. These appropriately trained individuals would wear appropriate personal protective equipment and follow the requirements of a health and safety plan.

- 1) **Describe any known or possible contamination at the site from present or past uses.**

See responses to questions A.11 and B.7.a.

- 2) **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

The purpose of the Project is to remediate hazardous substances in soil and groundwater.

- 3) **Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

The Project involves the removal of soils contaminated with toxic and hazardous substances (e.g., PCBs, cPAHs, copper, arsenic, gasoline, and dioxins/furans).

The only toxic or hazardous chemicals that might be stored or used during construction or operation of the Project are diesel, oil, and/or gasoline used by construction equipment and vehicles. The asphalt that would be used to cap the remediation areas could emit toxic fumes for a short duration that can irritate eyes, nose, and lungs, and the asphalt can cause burns and other skin damage if it comes into contact with skin.

The water, bacteria, and emulsified soybean oil proposed for the treatment injection mixtures would be non-toxic and non-hazardous.

- 4) **Describe special emergency services that might be required.**

The Project would not require special emergency services.

- 5) **Proposed measures to reduce or control environmental health hazards, if any:**

The Project would be implemented in compliance with a health and safety plan that includes requirements for managing toxic and hazardous substances and emergency procedures. The Project would also comply with a Project-specific Spill Prevention, Control and Countermeasures Plan that includes BMPs.

**b. Noise**

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

The 8801 property is in an industrial area with a lot of noise sources, including the Boeing airfield and traffic from East Marginal Way, SR 99, and Interstate 5. These noise sources would not affect the Project.

- 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.**

Equipment used to implement the Project would include jackhammers to break up asphalt surfaces, direct push drill rigs (to place the injection points), concrete corer, an auger drill rig, excavators, roll-off bins, and worker vehicles. The equipment that would generate the most noise would be the direct push drill rig, which would drive each of the 157 injection points into the ground using a percussion hammer. Each point would likely take less than 5 minutes of hammering to drive. Project activity would be limited to standard daytime working hours. The finished Project would not involve any noise, other than from the AS/SVE system, which is currently operating. The AS/SVE system noise is insignificant compared to that generated in the surrounding industrial and heavy traffic area.



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

In addition to restricting noise-generating construction activity to daytime working hours, the contractor would keep construction equipment's mufflers and exhaust systems in good operating condition.

**8. Land and Shoreline Use**

**a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

The 8801 property is currently vacant but has been and will continue to be used for industrial purposes. The Project would not affect current land uses on the 8801 property or on nearby or adjacent properties.

**b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

The 8801 property has been used for industrial purposes since at least the 1920s.

**1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:**

No working farms or forest land are located in the vicinity of the 8801 property. The Project is not anticipated to affect, or be affected by, working farm or forest lands operations.

**c. Describe any structures on the site.**

The existing buildings on the 8801 property include an administration building located in the southeast corner of the 8801 property, a large warehouse building that covers much of the east and mid portions of the 8801 property, a former boiler, powerhouse building and water tower located on the northwest side of the warehouse building; and a smaller warehouse located in the northwest portion of the 8801 property. The small warehouse building contains a groundwater AS/SVE remediation system that has been operational since 2004.

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

No structures would be demolished as part of the Project.

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

The 8801 property is zoned "manufacturing industrial center/heavy industrial" by the City of Tukwila.

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

The 8801 property is designated “manufacturing industrial center/heavy industrial” by the City of Tukwila.

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

The portion of the 8801 property within shoreline jurisdiction is designated High Intensity.

**h. Has any part of the site been classified as a critical area by the city or county? If so, specify.**

The portion of the 8801 property that is within 200 feet of the ordinary high water mark of the LDW is within the jurisdiction of the Shoreline Management Act (SMA), Chapter 90.58 RCW, and the City of Tukwila’s Shoreline Master Program (SMP). The SMP designates the land within 100 feet of the ordinary high water mark as a river buffer, subject to special vegetation and landscaping requirements.

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

The Project does not involve the construction or use of any structures that people would reside or work in.

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

The Project would not displace any people.

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

No measures are necessary.

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

No measures are necessary.

**m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:**

There are no agricultural or forest lands near the 8801 property that have a long-term commercial significance, so no measures are proposed.

**9. Housing**

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

The Project would not provide any housing units.

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

The Project would not eliminate any housing units.

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

No measures are necessary.

## **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?**

The Project does not include construction of any new structures.

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

The Project would not alter or obstruct views.

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

No measures necessary.

## **11. Light and Glare**

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

The Project would not produce any light or glare.

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

The finished Project would not generate any light or glare that could be a safety hazard or interfere with views.

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

No off-site sources of light or glare would affect the Project.

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

No measures are necessary.

## **12. Recreation**

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

There are no designated recreational opportunities in the immediate vicinity of the 8801 property. Some recreational boat use is possible on the LDW, but likely only as a through corridor.

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

No.

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

No measures are necessary.

**13. Historic and cultural preservation**

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

At least three buildings on the 8801 property are more than 45 years old: Buildings 1 and 3 are prefabricated rectangular steel warehouse structures that were built in 1930 and 1951, respectively. Building 2 is a masonry office building, which was constructed in 1964. None of these structures are listed in or eligible for listing in preservation registers.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

Stell completed a desktop cultural resources review in March 2019. The following summary of potential cultural materials that may be found on the 8801 property is excerpted from that study:

Previously recorded archaeological sites in the area consist of precontact isolates and several shell middens, as well as historic features and refuse concentrations. It is possible that these types of materials may also be located within the project area. This area is along the Duwamish River which was a major travel corridor until the Puget Sound region was logged and roads were constructed in the late 1800s and early 1900s. The placement of the Project area on a notable bend in the river (prior to channelization efforts in the early 1900s) increases the likelihood that humans stopped in this area and therefore increases the odds that cultural materials are present.

Given that this area was traditionally named for its use as a place to gather wood for the making of paddles, it is possible that archaeological materials such as stone axes and other cutting or sharpening tools may be present in this area. There may also be features related to periodic seasonal habitation of this area, while these resources were being gathered.

This area was also an early farm from 1866 until the land was industrialized in the 1930s, so evidence of agricultural activities such as pieces of farming equipment, horse or other domesticated animal skeletal materials, and domestic materials dating from the late 1800s and early 1900s may also be present subsurface. There may also be evidence of early logging activities as the farmland would have needed to be cleared in order to create agricultural fields.

Soils in the area are slightly to moderately acid and poorly drained. Soils with low acid levels are generally better for the preservation of any cultural materials that are present, and the anaerobic conditions created in slow-draining soils also increase preservation. Acidic soils can degrade artifacts until they are no longer recognizable, or in extreme cases, until they degrade completely. This means that the subsurface preservation of cultural materials would be quite high in this location.

The property also contains at least three previously unrecorded structures that are over 40 years in age. From a cursory review, it is unlikely that these structures will be found to be significant.

Stell, 2019, see response to question A.8 for full citation.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

Stell conducted a literature review and record search for the Project by consulting the DAHP Washington Information System for Architectural and Archaeological Records Database, historic maps and photographs, and other appropriate historical sources (Stell, 2019, see response to question A.8 for full citation).

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

A monitoring and inadvertent discovery plan (MIDP) has been prepared and would be implemented during the construction phase of the Project, and as necessary, additional consultation with Tribes and other interested parties would be conducted. The MIDP includes a requirement for professional archaeologist observation of the soil excavations, and procedures for stopping work and notifying appropriate parties in the case of a potential find.

#### **14. Transportation**

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

The primary access to the 8801 property is provided by East Marginal Way South, which abuts the east property line.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

The nearest King County Metro stop is approximately 500 feet northwest of the 8801 property on East Marginal Way South.

- c. **How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?**

The Project would not add or remove parking spaces.

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

No.

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

The Project would not require use of water or air transportation. Rail transportation of excavated soils to disposal facilities is possible depending on the final destination and quantities of material.

- f. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

During the construction phase of the Project there would be a temporary increase in traffic as trucks remove excavated soil off-site; however, there would be no long-term impact to traffic patterns. After the construction phase of the Project is complete, there would be limited trips throughout the year to perform compliance monitoring.

- g. **Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

The Project would not interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area.

- h. **Proposed measures to reduce or control transportation impacts, if any:**

No measures are necessary.

## 15. **Public Services**

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

The Project would not result in an increased need for public services.

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

No measures are necessary.

**16. Utilities**

**a. Circle utilities currently available at the site:**

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other \_\_\_\_\_

**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.**

The Project would not permanently add or alter any utilities at the 8801 property. Some BMPs may be used during the construction phases of the Project to minimize the potential for contaminants to discharge through the stormwater system to the LDW, such as temporary plugs during the proposed treatment injections.

**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.

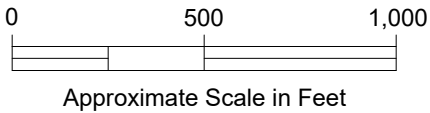
Signature: Brian Haderlie

Name of signee Brian Haderlie

Position and Agency/Organization Environmental Engineer, PACCAR Inc

Date Submitted: 01/21/2021





NOTE

Bing Map Image adapted from aerial imagery provided by Autodesk Live Maps and Microsoft Bing Maps reprinted with permission from Microsoft Corporation.

8801 East Marginal Way South  
Tukwila, Washington

**VICINITY MAP**

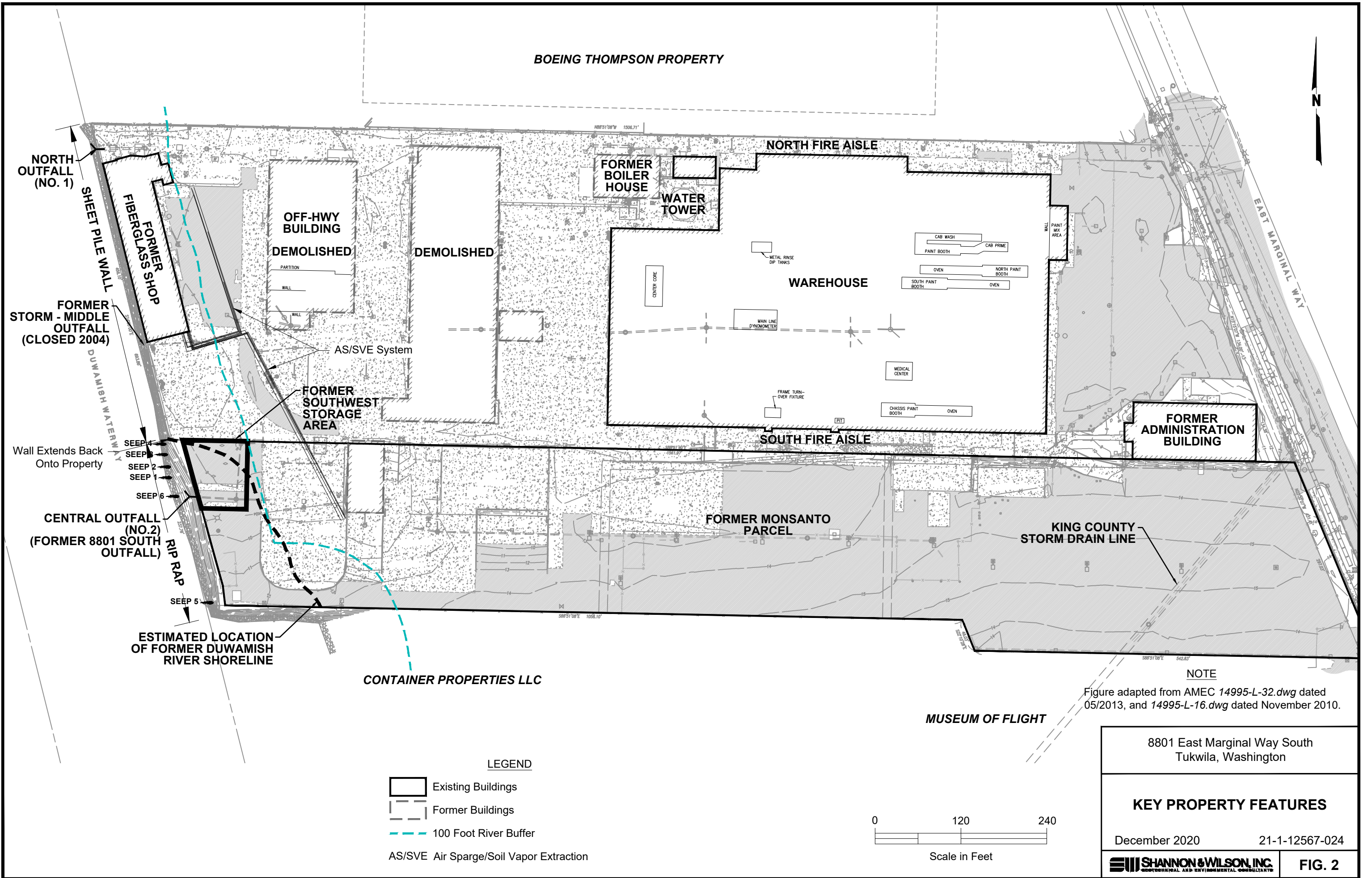
December 2020                      21-1-12567-024



**FIG. 1**



Filename: C:\Users\jrs\CAD Group\Dropbox\Drive\21112567\024\21-1-12567-024 Key Site Features.dwg Layout: Figure 2 Date: 11-30-2020 Login: JRS



BOEING THOMPSON PROPERTY



NORTH OUTFALL (NO. 1)

FORMER STORM - MIDDLE OUTFALL (CLOSED 2004)

Wall Extends Back Onto Property




CENTRAL OUTFALL (NO.2) (FORMER 8801 SOUTH OUTFALL)

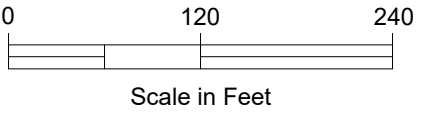
ESTIMATED LOCATION OF FORMER DUWAMISH RIVER SHORELINE

CONTAINER PROPERTIES LLC

MUSEUM OF FLIGHT

LEGEND

-  Existing Buildings
-  Former Buildings
-  100 Foot River Buffer
- AS/SVE Air Sparge/Soil Vapor Extraction



NOTE  
Figure adapted from AMEC 14995-L-32.dwg dated 05/2013, and 14995-L-16.dwg dated November 2010.

8801 East Marginal Way South Tukwila, Washington	
<b>KEY PROPERTY FEATURES</b>	
December 2020	21-1-12567-024
 SHANNON & WILSON, INC. TECHNICAL AND ENVIRONMENTAL CONSULTANTS	<b>FIG. 2</b>