

DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300 Call 711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

STATE ENVIRONMENTAL POLICY ACT DETERMINATION OF NONSIGNIFICANCE

Date of Issuance: March 25, 2021

<u>Lead agency:</u> Department of Ecology, Toxics Cleanup Program, Southwest Region

Agency Contact: Andrew Smith, Cleanup Project Manager, andrew.smith@ecy.wa.gov;

(360) 407-6316

<u>Permit Number:</u> Not applicable. Work is to be performed under the authority of a Model Toxics

Control Act Agreed Order No. DE 15616

<u>Description of proposal:</u>

The project will modify the stormwater conveyance system on the project site and install a permeable reactive barrier (PRB) in the subsurface parallel to Wapato Creek in an effort to reduce concentrations of arsenic contaminated groundwater entering Wapato Creek. If it is determined based on monitoring data that concentrations of arsenic in the groundwater have not reduced to the desired levels, then additional contingent remedial actions will be employed.

During the first two years, work to be performed includes improvements to the conveyance system including: 1) removal of significant accumulated debris in the site stormwater system that discharges at outfalls OF-2 and OF-3 and installation of tide gates at outfalls OF-2 and OF-3, and; 2) removal of the spill containment vaults in the conveyance system and slip lining the conveyance pipes (or other trenchless pipe repair) between Wapato Creek and the removed vaults. A section of pipe or stormwater vault will be installed in place of each of the existing vaults.

During year four, the Port of Tacoma will construct a PRB parallel to Wapato Creek along the westernmost boundary of the Log Yard cap and along a portion of the northwestern boundary. The PRB will extend to below the streambed of Wapato Creek and will be expected to key into the underlying low permeability silts. It will be backfilled with reactive media to treat dissolved arsenic in the groundwater passing through the PRB. A low-permeability material to inhibit surface water infiltration and provide structural strength would be placed atop the reactive media to restore the grade to pre-excavation conditions. The PRB performance will be monitored and evaluated to determine effectiveness and the reactive media replenishment schedule. Monitoring wells will be installed within and downgradient of the PRB during its construction and will be used to assess the effectiveness of the PRB.

DETERMINATION OF NONSIGNIFICANCE

Page 2 of 3 March 25, 2021

If it is determined additional remedial actions are needed based on groundwater monitoring data, then additional contingent groundwater treatment will be employed consisting of collecting subsurface perched water with a French drain type system. The collected perched water would be treated in-situ in vaults with reactive media and then allowed to infiltrate into a more permeable deeper soil layer. Additional contingent remedial actions associated with the conveyance system may be employed including slip lining or sealing additional sections of stormwater conveyance piping upstream of the removed vaults.

<u>Location of proposal:</u> The work will be employed along the western portion of the property at 4215 SR 509 E. Frontage Rd., Tacoma, WA 98421-3998.

Applicant/Proponent: Port of Tacoma

Project Representative: Rob Healy, Senior Manager, Environmental Programs

E-MAIL: rhealy@portoftacoma.com

PHONE: (253) 428-8643

ADDRESS: 1 Sitcum Plaza, Tacoma, WA 98421-3000

Ecology has determined that this proposal will 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). We have reviewed the attached Environmental Checklist, as well as the Remedial Investigation, Feasibility Study, Feasibility Study Addendum and public review draft Cleanup Action Plan. These documents are available at: https://apps.ecology.wa.gov/gsp/sitepage.aspx?csid=3642

This determination is based on the following findings and conclusions:

- The project will reduce concentrations of arsenic entering Wapato Creek.
- Engineering design documents will be prepared and approved by Ecology to ensure all
 onsite work will be performed in accordance with applicable standards and use of best
 management construction and erosion control practices.
- Contaminated soils will be managed in accordance with a previously-approved (by Ecology) soils testing and disposal plan.
- The work will be conducted under the requirements of a construction stormwater NPDES permit, which requires adherence with a stormwater pollution prevention plan.
- The Ecology cleanup project manager will provide oversight during project construction.

The comment period for this DNS corresponds with the comment period for the Remedial Investigation, Feasibility Study, Feasibility Study Addendum, Public Review Draft Cleanup Action Plan and associated Agreed Order. The comment period begins on April 22, 2021 and ends on May 23, 2021.

DETERMINATION OF NONSIGNIFICANCE

Page 3 of 3 March 25, 2021

Responsible official:

Rebecca S. Lawson, P.E., LHG Section Manager Toxics Cleanup Program Southwest Region Department of Ecology P.O. Box 47775 Olympia, WA 98504-7600 360-407-6241

Signature

Date March 25, 2021



https://www.portoftacoma.com/

ENVIRONMENTAL CHECKLIST

Port of Tacoma Parcel 15 Cleanup

PURPOSE

The State Environmental Policy Act (SEPA), Chapter 43.21 RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. The purpose of this checklist is to provide information to help identify impacts from the proposal (and to reduce or avoid impacts, if possible) and to help the Lead Agency to make a SEPA threshold determination.

A. Background

1. Name of proposed project, if applicable:

Port of Tacoma Parcel 15 Cleanup

2. Name of applicant:

Rob Healy, Senior Environmental Project Manager

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

Port of Tacoma PO Box 1837 Tacoma, WA, 98401

253-428-8643

4. Date checklist prepared:

February 24, 2021

5. Agency requesting checklist:

Department of Ecology

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

The final remedy will be implemented in two discrete phases:

- Phase 1 Cleanup: Phase 1 implementation will be initiated following finalization of the Cleanup Action Plan (CAP) and execution of an Agreed Order (AO). This work will include the following:
 - Development of an engineering design report, including supporting plans
 (Compliance Monitoring and Contingency Response Plan (CMCRP), Contaminated



https://www.portoftacoma.com/

Media Management Plan (CMMP), and an Operations Monitoring and Maintenance Plan (OMMP) for the existing cap)

- Design and permitting for the Phase 1 cleanup
- Construction of the Phase 1 cleanup, including construction of the Permeable Reactive Barrier (PRB) and storm drain improvements
- Development of a Completion Report for Phase 1 construction
- o Implementation of ongoing cap maintenance activities as defined in the OMMP
- Groundwater monitoring and data evaluation as defined in the CMCRP (including, if applicable, the implementation of a contingent remedy [conveyance system improvements and perched groundwater treatment]).
- **Phase 2 Cleanup:** Construction of the future low-permeability cap requires verification of land use planning assumptions and coordination with future redevelopment activities. This work will be implemented under a separate future AO Amendment or Consent Decree, and will include the following:
 - Development of a Phase 2 engineering design report, including supporting plans (Phase 2 OMMP for the upgraded cap)
 - Design and permitting for the Phase 2 cleanup
 - Construction of the Phase 2 cleanup, including construction of the low-permeability cap
 - Development of a Completion Report for Phase 2 construction
 - Implementation of cap maintenance activities as defined in the Phase 2 OMMP
 - Ongoing groundwater monitoring and data evaluation as defined in the CMCRP

Phase 2 will be part of a larger redevelopment and included in that SEPA action.

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

Parcel 15 will continue to be used to support port-industrial activities by the Port of Tacoma and Northwest Seaport Alliance. While there are currently no redevelopment plans, it is likely the site will under-go some type of redevelopment in the future.

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

A comprehensive summary of previous environmental investigations prior to the remedial investigation (RI) (GSI 2017) is provided in the Remedial Investigation Report. Table 1 provides a summary of documents representing the primary investigations and evaluations. RI activities were conducted during 2016 and 2017 consistent with an Ecology-approved RI Work Plan (GSI, 2016; Ecology, 2016). The

January 2021



https://www.portoftacoma.com/

investigation approach for the RI entailed testing for arsenic concentrations and redox chemistry across the Site, with additional testing near Wapato Creek for geochemical conditions affecting arsenic mobility and attenuation. Additional constituents, such as pentachlorophenol (PCP), were analyzed in historical source areas in the Sawmill. Data collection included groundwater sampling, soil sampling, test pit explorations, porewater sampling, surface water sampling, outfall discharge sampling, sediment sampling, and a tidal study in the adjacent Wapato Creek. In addition, the following Ecology-approved activities were conducted beyond the scope of work described in the RI work plan:

- Conducted a video survey of stormwater lines.
- Visually inspected and surveyed the invert elevations in the spill containment vaults located adjacent to Manholes #1 and #6.
- Installed transducers to evaluate water level fluctuations in response to precipitation seepage through the cap.
- Abandoned monitoring well HC-1 to prevent it from acting as a potential conduit for rainwater to migrate into the underlying fill containing slag.

Post-RI studies conducted have included the following:

- Preparing a MTCA feasibility study (FS) (GSI, 2018) that screened potentially viable remedial technologies; considered potential effects of climate change; analyzed different remedial alternatives, including five for the Log Yard and three for the Sawmill; and identified preferred remedial alternatives for each area following completion of a disproportionate cost analysis.
- Preparing a FS addendum (GSI, 2019a) that evaluated a refined remedial alternative for the Log Yard.
- Performing additional groundwater monitoring in February 2019 (GSI 2019b), with a second event in August 2019.
- 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.

None known other than this CAP.

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

Cleanup Action Plan and implemented through an Agreed Order. Rivers and Harbors Act Section 10 for the tide gate.

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.

The selected cleanup remedies include the following components:

https://www.portoftacoma.com/

- Log Yard Remedy: The selected Log Yard remedy uses a two-phased approach. The first phase of cleanup will be implemented following finalization of this CAP and will include maintenance of the existing cap, improvements to the stormwater conveyance system, installation and operation of a permeable reactive barrier (PRB) along Wapato Creek, environmental monitoring, and implementation of institutional controls (ICs). The second phase of cleanup will be implemented following completion of land use planning and in parallel with future Site redevelopment. The second phase includes replacement of the existing cap with a low-permeability geosynthetic clay liner (GCL) cap or an alternate cap achieving the same or better infiltration control performance. The remedy also includes contingent remedial actions to be used in the event that Site remediation levels are not met.
- **Sawmill Remedy:** The selected remedy for the Sawmill uses natural attenuation processes to treat residual PCP in groundwater, within the former dip tank area. The remedy incorporates natural attenuation monitoring, institutional controls, and contingent remedial actions.

The cleanup will be implemented in two phases. Compliance monitoring will ensure that cleanup standards are met.

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.

Parcel 15 consists of an approximately triangular parcel of about 52 acres of land owned by the Port. The Site is located at 4215 State Route (SR) 509 – North Frontage Road in an industrial area between Interstate 5 and Commencement Bay, in Tacoma, Washington. The Site is bounded by East 4th Street (northern boundary), Alexander Avenue East (western boundary), and North Frontage Road (SR 509) (southeastern boundary). Wapato Creek is situated between Alexander Avenue East and the western edge of the property, and empties into the Blair Waterway through a culvert under East 4th Street. The Blair Waterway is in the southern portion of Commencement Bay, one of multiple industrial waterways developed in the 1900s to support international commerce. See CAP for vicinity map.

B. Environmental Elements

- 1. Earth
- a. General description of the site:

(circle one): Generally flat.

The site does border Wapato creek which has some nearly vertical banks.



https://www.portoftacoma.com/

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

Remediation area is nearly flat. Bank of Wapato Creek can approach 1:1 in places.

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.

The subsurface lithology at the Site is divided into the following units:

Fill Containing Slag – Near-surface material placed since industrial development of the Site began in 1974 (e.g., includes a mixture of sand, silt, slag, and bark fill material). This unit is overlain by the capping materials.

Dredged Sediment Fill – This represents the silty sand material that is situated above the fine-grained native alluvial deposits and likely originated from sediment that was dredged during construction of the adjacent Blair Waterway and deposited onto the Site and surrounding area between 1959 and 1965.

Native Alluvium – The natural deposits from the Puyallup River wetlands consists of a mixture of interbedded silt, sand, and clay and may be hard to distinguish from the overlying dredged sediment fill.

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

The soils are generally stable. The banks of Wapato Creek are generally stable with occasional small erosional features, but that does not threaten the remediation area.

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.

Cleanup actions such as the installation of the permeable reactive barrier will require excavation along its length. Excavation quantities will be developed as the design is refined. Suitable soils will be replaced in the trench. Any soil removed from the site will be disposed of at a licensed landfill. Any imported soils will be from an approved source and tested prior to placement on site.

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

Erosion is very unlikely as a result of the cleanup plan.

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

There will be no change in the percentage of imperious surfaces as a result of this cleanup. The remediation area will remain nearly 100% impervious.



https://www.portoftacoma.com/

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

Appropriate Temporary Erosion and Sediment Control best management practicies will be installed prior to construction, maintained during construction, and modified as necessary to comply with NPDES requirements.

2. Air [help]

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.

Minor temporary air emissions will occur as a result of operating equipment during construction. There will be no air emissions as a result of project operations. Minor air emissions are likely when equipment is used to maintain the cap over time.

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:

Contractors are required to follow the Port's anti-idling policy during on-site construction/maintenance.

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.

Yes, Wapato Creek is on the western boarder of the site. It 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, cleanup activities will occur within 200' of Wapato Creek. No work is proposed within the creek.



https://www.portoftacoma.com/

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 fill or dredge material will be placed within a wetland or surface water.

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

No surface water withdrawals or diversions are proposed.

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

No, only Wapato Creek is in the floodplain and remedial activities will not occur in that area.

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. 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.

No groundwater will be withdrawn from a well for drinking water or other purposes. As a contingency measure perched groundwater may be extracted from a horizontal drain and treated prior to discharge either to surface water or groundwater. The quantity of water would be estimated during project design.

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 material is proposed to be discharged. The purpose of this cleanup action is to control historic contamination.

c. Water runoff (including stormwater):



https://www.portoftacoma.com/

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.

The existing on site stormwater system will be improved (tight lined) to ensure contaminants in the soils and groundwater are not discharged through the storm system.

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

The purpose of this project is to ensure legacy waste materials do not leave the site.

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

No. The proposal tight lines the existing drainage system. The volume of water leaving the site will not change.

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

As part of the cleanup action, the existing drainage system will be improved to segregate stormwater from onsite groundwater and soils

4. Plants

deciduous tree: alder, maple, aspen, other: ornamentals
X evergreen tree: fir, cedar, pine, other X shrubs
X grass
pasture crop or grain
orchards, vineyards or other permanent crops.
 X wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other X water plants: water lily, eelgrass, milfoil, other: non-native milfoil, marine algae

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

and phytoplankton

No vegetation is proposed for removal or alteration.

other types of vegetation

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

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

https://www.portoftacoma.com/

None known.

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

No landscaping or measures to preserve or enhance vegetation are proposed as part of the cleanup.

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

Tansy, poison hemlock, Himalayan Blackberry. Likely others depending on the year.

5. Animals

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

Examples include:

X birds: hawk, heron, eagle, songbirds, other: falcon, osprey, resident, and

migration waterfowl

X mammals: Rodents, small mammalsX fish: Salmon, trout (in Wapato Creek).

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

Threatened and endangered species are known to occur on or near the Port properties. These include:

Species	Federal Status	Action Areas	Critical Habitat Within Action Area
Puget Sound Chinook salmon Oncorhynchus tshawytscha	Threatened	All aquatic areas (freshwater, estuarine and marine)	All areas waterward of OHW or HTL
Puget Sound steelhead Oncorhynchus mykiss	Threatened	All aquatic areas (freshwater, estuarine and marine)	All areas waterward of OHW or HTL
Coastal-Puget Sound bull trout Salvelinus confluentus	Threatened	All aquatic areas (freshwater, estuarine and marine)	All areas waterward of OHW or HTL
Killer whale: Southern Resident <i>Orcinus orca</i>	Endangered	Marine only	All waters in Puget Sound deeper than 20 ft (6.1 m)



https://www.portoftacoma.com/

Species	Federal Status	Action Areas	Critical Habitat Within Action Area
Humpback whale Megaptera novaeangliae	Endangered (Central America), Threatened (Mexico)	Marine only	No critical habitat has been designated for the humpback whale
Marbled murrelet Brachyramphus marmoratus	Threatened	Marine only	No critical habitat designated within the action areas. Marine environments were not designated.
Eulachon Thaleichthys pacificus	Threatened	Marine only	No critical habitat designated within the action areas.
Bocaccio Sebastes paucispinis	Endangered	Marine/Estuarine only	Nearshore and deep water habitat
Yelloweye rockfish Sebastes ruberrimus	Threatened	Marine only	Deepwater habitat (>30 m)

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

Wapato Creek is a migratory route for anadromous salmonids. The Tideflats are part of the Pacific Flyway.

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

No adverse impacts to wildlife are anticipated and thus no enhancement measures are proposed.

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

None known.

6. Energy and Natural Resources [help]

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 will not require any additional or different energy sources to operate.

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:



https://www.portoftacoma.com/

Energy conservation is one of the three main themes overarching the objectives in the *Northwest Ports Clean Air Strategy 2020 Strategy Update*: port authorities will continue to advance policies that promote efficiency and phase out old, high emitting equipment in favor of new equipment. Under this objective, the Port of Tacoma and the NWSA will focus on reducing fuel and energy use across the sectors to reduce air and greenhouse gas emissions. Additionally, actions within the Port Administration section promote energy conservation. These actions include continually advancing efficiency in port authority fleets, facilities, and lighting, as well as setting an objective to have zero emission buildings and high efficiency lighting in place by 2050.

7. Environmental Health [help]

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.

As a remediation effort exposure to certain contaminants is possible for the construction crews. See below.

Crews will use diesel powered equipment and there is a chance for fuels spill or hydraulic line leaks.

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

Log Yard

Before installation of the cap, infiltration or precipitation through the fill containing slag, and subsequent discharge of stormwater to Wapato Creek (via the former central drainage ditch, subsurface drains, and direct overland flow), served as a direct pathway for metals migration to surface water and potentially groundwater. The cap in the Log Yard was installed between late 1988 and early 1989 with the intention of cutting off surficial and shallow subsurface stormwater drainage through the fill containing slag. However, observations of ongoing perched water in a number of wells confirmed that there are portions of the Site where fill containing slag is still saturated, and thus leaching of metals from the slag still serves as an ongoing source of arsenic to groundwater. Although the cap significantly reduced infiltration and groundwater flux to the creek, seepage of ponded stormwater through the cap appears to be the primary source of the ongoing perched water.

Arsenic in groundwater has the potential to be transported toward Wapato Creek via either the groundwater-to-porewater-to-surface water pathway, or through infiltration into the storm drain system. Because the Log Yard has been capped, surface soil migration through water and wind erosion is not a significant release mechanism in the Log Yard portion of the Site. Further details on these pathway mechanisms are provided in the RI report (GSI, 2017).

Sawmill

PCP was used historically at the former sawmill to prevent sap stain, applied in a water-



https://www.portoftacoma.com/

based solution using spray booths and a dip tank. In previous remedial actions, PCP sources and contaminated soil were removed. Some PCP contamination persists in groundwater in the immediate vicinity of the former dip tank, although it has not migrated to porewater or surface water at concentrations above screening levels. Decreases in PCP concentration have been observed over time due to natural degradation. However, elevated pH values in groundwater have been observed at the same well as the highest PCP detections (well MW-2R). The alkaline conditions in groundwater in the former dip tank excavation area are likely the result of the recycled concrete aggregate that was used for backfill (University of Wisconsin-Madison, 2012). The alkaline groundwater conditions are considered to be localized in the concrete aggregate backfill, given that a high pH was not observed in the three wells (MW-1, MW-3, and MW-4) located adjacent to the former dip tank excavation area.

Alkaline groundwater conditions can inhibit biological activity and reduce the adsorptive capacity of PCP, resulting in a localized increase in PCP mobility. However, PCP concentrations have continued to naturally attenuate over time.

In addition, two wells north of the former dip tank area (MW-1 and MW-3) have arsenic concentrations above the natural background concentrations. Groundwater arsenic concentrations in this range are likely caused by arsenic desorption from naturally occurring minerals, a process promoted under the reducing geochemical conditions and the nearby alkaline conditions in the former dip tank area (see the RI report for further details). Methane gas is also present in those wells

Main Contaminants of Concern

The site-associated contaminants identified for cleanup are arsenic and PCP, with arsenic the primary driver in the Log Yard, and PCP the primary driver in the Sawmill. In addition, methane gas is identified as a site-associated contaminant in the Log Yard and portions of the Sawmill that will be managed through institutional controls (IC)s.

- 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. No known hazardous transmission lines are under the cap. The whole point of the design is to reduce risks from on-site contaminants.
- 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.

Fuels and lubricants for construction will be on site during active construction. Equipment and certain cargo will have fuel to operate/move the equipment/cargo.

- 4) Describe special emergency services that might be required. No special emergency services are expected to be required.
- 5) Proposed measures to reduce or control environmental health hazards, if any: The remedial construction will be conducted by a contractor trained and certified for conducting such work. Work will be conducted per the Cleanup Action Plan.

https://www.portoftacoma.com/

b. Noise

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

Port areas are highly industrialized and are affected by a wide range of noise sources, such as traffic, trucks, trains, cargo handling equipment, and vessels. These noise sources will 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.
 - Noise will be generated by construction equipment during active remediation. Post remediation noise level will not change appreciably from their current levels.
- 3) Proposed measures to reduce or control noise impacts, if any:

The contract will adhere to the City of Tacoma's noise ordinance.

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 site and surrounding areas are used for port industrial activities. The proposal will not affect surrounding land uses.

- 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?
 No.
 - 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.

c. Describe any structures on the site.

The site is paved with an existing environmental cap made of reinforced concrete. The site contains storm drainage and fencing.

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

Some pavement will be demolished and replaced once remedial activities are complete.

https://www.portoftacoma.com/

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

Port Maritime Industrial

- f. What is the current comprehensive plan designation of the site?
 Manufacturing Industrial Center.
- g. If applicable, what is the current shoreline master program designation of the site?
 S-10 Port Maritime Industrial
- h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

Yes. A portion of the site includes the critical area buffer for Wapato Creek.

- i. Approximately how many people would reside or work in the completed project? There is no housing on site nor will there be a change in jobs.
- j. Approximately how many people would the completed project displace? None
- **k.** Proposed measures to avoid or reduce displacement impacts, if any: None needed.
- I. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

Site activities will not change as part of the remediation effort. It is an industrial area and will remain so.

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

There are no ag or forest lands to protect.

9. Housing

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

No housing is proposed as part of this remediation.

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

No housing is proposed to be demolished.

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

No measures to reduce or control housing impacts are proposed.

https://www.portoftacoma.com/

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?

All work is at or below grade level including repaying.

- b. What views in the immediate vicinity would be altered or obstructed? No views are anticipated to be altered or obstructed.
- c. Proposed measures to reduce or control aesthetic impacts, if any: No measures to reduce or control impacts to aesthetics are proposed.

11. Light and Glare

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

There may be some light generated from construction equipment, but it will be temporary and minor if any.

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

No.

- c. What existing off-site sources of light or glare may affect your proposal? None.
- d. Proposed measures to reduce or control light and glare impacts, if any:

 None.

12. Recreation

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

Numerous recreational activities take place within or near the port study areas. These include mitigation and public access sites such as Dick Gilmur car-top boat launch, Sitcum observation tower, Gog Le Hi Ti Wetlands and Place of Circling Waters.

- b. Would the proposed project displace any existing recreational uses? If so, describe. No displacement of existing recreational uses is anticipated as a result of this cleanup action.
- 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 expected to be necessary.



https://www.portoftacoma.com/

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.

None known.

- 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.
 - There are no known cultural resources on this site. However, the southern Port of Tacoma properties are of a higher risk of inadvertent discovery of cultural resources than are the northern properties. The site was covered in the Cultural and Historic Resource study conducted for the Blair Hylebos Terminal Redevelopment Project in 2008. The Port is currently procuring a firm to support remedial design and construction. Once a firm is selected, a 05-05 Ecology consult will be completed prior to initiating any sub-surface work at the site.
- 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.

The methodology for identifying cultural resources are described in detail in the report cited above. The Port of Tacoma is in routine contact with Puyallup Tribe of Indians cultural and historic resource staff on projects across the Port.

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.

The Port of Tacoma has traditionally used the Puyallup Tribe of Indians Inadvertent Discovery Plan as found on their website. However, the Port will use Ecology's template if required. The Port's general practice after consultation with the Tribe is to have cultural resource monitors on site during construction that involves excavation in native soils (through the fill layer). However, for higher risk sites the Port will have monitors on site while excavating in fill if requested by the Puyallup Tribe.

14. Transportation [help]

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. SR 509 and Taylor Way.



https://www.portoftacoma.com/

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 site is not served by public transit. The closest area for transit would be Highway 99.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? None and none.
- 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.

All those modes of transportation exist in the area, but only roads are required to get equipment and crews to the site for active remediation.

- 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?

 There will be no change in vehicle trips as a result of this project.
- 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. $N_{\rm O}$
- h. Proposed measures to reduce or control transportation impacts, if any: None proposed.
- 15. Public Services [help]
- 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.
 No.
- **b.** Proposed measures to reduce or control direct impacts on public services, if any. No measures are necessary.
- 16. Utilities [help]
- a. Circle utilities currently available at the site:



https://www.portoftacoma.com/

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other stormwater utilities, commercial and solid waste collection

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.

No utilities are proposed as part of this project.

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:	Robert Healy	

Name of signee: Robert Healy

Position and Agency/Organization: Senior Manager, Port of Tacoma

Date Submitted: March 26, 2021

https://www.portoftacoma.com/

D. Supplemental sheet for nonproject actions [HELP]

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

Proposed measures to avoid or reduce such increases are:

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

3. How would the proposal be likely to deplete energy or natural resources?

Proposed measures to protect or conserve energy and natural resources are:

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Proposed measures to protect such resources or to avoid or reduce impacts are:

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Proposed measures to avoid or reduce shoreline and land use impacts are:

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Proposed measures to reduce or respond to such demand(s) are:

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.