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. <u>You may use "not applicable" or</u> <u>"does not apply" only when you can explain why it does not apply and not when the answer is unknown</u>. 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 <u>all parts of your proposal</u>, 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 <u>SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D)</u>. 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 [HELP]

- 1. Name of proposed project, if applicable: Interim Action Work Plan 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 106th 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: June 2019
- 5. Agency requesting checklist: Washington Department of Ecology Toxics Cleanup Program NWRO
- 6. Proposed timing or schedule (including phasing, if applicable):

The cleanup actions will be conducted after the Washington State Department of Ecology (Ecology) has completed formal review of the Interim Action Work Plan and the actions are accepted (commencing summer 2019 and anticipated to be completed fall 2019). An engineering design report that provides additional details and design of the remedial actions will be provided for review by Ecology after the Interim Action Work Plan is approved. After Ecology approval of the engineering design report, it is proposed to complete the remedial actions within one year.

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

PACCAR does not have additional plans as part of the remediation work associated with this SEPA checklist; however, a separate SEPA checklist has been submitted by CenterPoint 8801 Marginal LLC (CenterPoint), the current property owner, for proposed redevelopment of the property. The complete 8801 site consists of both an upland portion (the 8801 property, the location of this proposed project) and the adjoining sediments in the Lower Duwamish Waterway (LDW) waterward of the mean higher high water mark. The 8801 site is subject to two separate Agreed Orders (AOs): AO No. 6069 applies to the uplands and AO No. 3599 applies to the adjoining LDW sediments. A 5-mile stretch of the LDW has been designated as a Superfund site by the U.S. Environmental Protection Agency (EPA). The Record of Decision (ROD) for the LDW Superfund site remediation 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 sediments adjoining the 8801 property. The sediment remedy for this site will not be implemented until after remedial design completion which is estimated to be in 2024. The test is being implemented to determine the effectiveness of enhanced monitored natural recovery in the stretch of the LDW that includes 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 adjoining sediment remediation actions are not part of this proposed project, and are not addressed in this SEPA checklist.

Redevelopment of the property (by others) is slated for late 2019 through 2021. This redevelopment will include construction of a warehouse on the 8801 property and is covered under a separate 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., 2019a, Final Ecology Review Focused Feasibility Study, 8801 East Marginal Way S., Tukwila, Washington. Report prepared by Shannon & Wilson, Inc., Seattle, Wash. for PACCAR, Inc., May.
- Shannon & Wilson, Inc., 2019b, Draft Interim Action Work Plan, 8801 East Marginal Way South, Tukwila, Washington. Report prepared by Shannon & Wilson, Inc., Seattle, Wash. for PACCAR, Inc., March.
- 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.
- 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 for the proposed redevelopment..

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

- National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit (Ecology)
- Shoreline Substantial Development Permit (City of Tukwila)

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.)

Ecology is working with the EPA to identify and remove sources of ongoing contaminant contribution to the LDW. Since the upland project area is adjacent to the LDW, the proposed remedial actions described below are designed to be protective of the sediments and surface water of the LDW. In 2017, Ecology provided LDW-specific preliminary cleanup levels (PCULs) that account for LDW-wide specific criteria that were expected to be

protective of the sediments and surface water in the LDW. Ecology updated these values in 2018 (Ecology, 2018). The 2018 PCULs were used as the basis for determining the distribution of chemicals on the 8801 property and the areas that require remedial actions.

The upland portion of the 8801 site, where the proposed remediation activities will occur, occupies 24.30 acres on the east bank of the LDW and is owned by CenterPoint. The 8801 property has been leased to Insurance Auto Auctions, Inc. (IAAI) since 2004. IAAI stored and auctioned off insurance write-off vehicles; IAAI vacated the 8801 property in 2018 but continues to operate a stormwater management system on the 8801 property. CenterPoint plans to redevelop the 8801 property; however, this action is being reviewed and permitted separately outside the scope of this SEPA checklist. The proposed remedial actions consider the proposed redevelopment and protection of future 8801 property occupants.

The primary soil and groundwater contaminants of concern and locations on the 8801 property are as follows:

- Soil
 - Halogenated volatile organic compounds (VOCs) including trichloroethene (TCE) and vinyl chloride in the north and western areas of the property
 - Total carcinogenic polyaromatic hydrocarbons (cPAHs) (compared as a total equivalency quotient [TEQ]) in former diesel and oil spill area to the west and northwest of the main warehouse

Total polychlorinated biphenyls (PCBs) aroclors at the south western property boundary (in association with copper and gasoline-range hydrocarbons), and the southwest area in conjuction with total cPAHs TEQ, oil-range hydrocarbons, arsenic, cadmium, copper, lead and dioxins

- Arsenic on the eastern side of the main warehouse
- Groundwater
 - Halogenated VOCs in the north and western areas including TCE, and vinyl chloride
 - Gasoline-range hydrocarbons, diesel- and oil-range hydrocarbons and vinyl chloride in the northwest corner
 - Total PCB aroclors on the north eastern property boundary and the south west area
 - Copper in various pockets on the western side
 - Bis(2-ethylhexyl)phthalate, a semi-volatile organic compound in various locations within the groundwater

Proposed remedial actions are primarily focused on the soil and groundwater and reducing the impact of the halogenated VOCs on 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 planned remedial actions include:

Soil Remediation

The selected soil remedial action includes complete excavation of six hotspot areas, concentrated areas where chemicals of concern (COCs) exceed remediation levels; capping remaining areas of the 8801 property which were not excavated but have COCs above remediation levels or CULs; and implementation of institutional controls. Proposed institutional controls include a deed restriction that would require onsite surface cover (e.g., buildings and other impervious surfaces) be maintained to

minimize stormwater infiltration. This remedial action reduces a significant mass of COCs in soil and minimizes potential for construction worker exposure at the 8801 property.

Groundwater Remediation

The groundwater halogenated VOC plume extends over much of the western half of the 8801 property. The selected remedy consists of excavation of TCE-impacted soil to the remediation level within an area near the northern property boundary, injection of carbon (an edible and non-toxic emulsified soybean oil mixture) and bacteria to enhance the natural breakdown of the halogenated VOCs in the northeastern portion of the plume, extension of the existing groundwater air sparge/soil vapor extraction (AS/SVE) to the west of its current alignment, and allowing natural degradation processes to continue between the area of injection and the AS/SVE system.

PCBs have been detected above aroclor detection limits in groundwater at two monitoring wells along the north end of the 8801 property. The remedial option selected to address the groundwater in this area is removal of PCB-containing caulking from surface joints in the pavement that is likely serving as the source of PCBs in groundwater. Ongoing monitoring will be undertaken following remedial actions and additional contingencies implemented, if necessary.

Institutional controls in the form of a deed restriction will be implemented to ensure that 8801 property groundwater will not be used for drinking water.

Groundwater and Soil Remediation: Northwest Corner of Site

Total petroleum hydrocarbons (TPH) and halogenated VOCs are also present in soil and groundwater in the northwest corner of the 8801 property. The selected remedy for this area is injection of an oxygen-containing compound (in-situ chemical oxidation or ISCO) to accelerate the naturally occurring remediation of the TPH and halogenated VOCs that degrade more rapidly in an oxygen-rich environment. Because of the proximity of this area to the LDW, and the characteristics of the existing sheet pile wall, injection will be preceded by installation of a "grout curtain" using a thick concrete to 20 feet below ground surface (bgs). This grout curtain will function as an upland retaining wall that will prevent migration of the media into the river.

Indoor Air Vapor Control

The western footprint of the proposed future building overlies part of the halogenated VOC groundwater plume. Since the remediation of the halogenated VOC plume will not be completed prior to the proposed construction, sub-slab depressurization beneath the affected area of the western side of the building has been selected to remove the pathway to the indoor air of the building.

Soil and groundwater samples will be analyzed during remedial action activities. Soil will be excavated until the remediation levels are reached. Groundwater monitoring will be used to determine if additional injections are required. On completion of the active remediation, groundwater monitoring will continue until the CULs are being achieved along the western edge of the 8801 property, prior to the point at which the groundwater enters the LDW.

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 [HELP]

1. Earth [help]

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 upland portion of 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 western edge 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.

Previous investigations by other parties at the 8801 property 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 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 on the project site. 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.

Soil Remediation

The soil remedial action includes excavation of six hotspot areas, totaling approximately 22,000 square feet (about 4 percent of the 8801 property). The excavations will range in depth from approximately 2 to 12 feet bgs and will remove a total of approximately 11,000 tons of soil contaminated with PCBs, cPAHs, copper, arsenic, gasoline, and dioxins/furans. The excavated soil has been classified as non-hazardous waste based on previous sample results.

The excavated soil will 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 will be backfilled with compacted inert fill (the source of the fill will be determined during the design phase and will be tested or certified to ensure it is clean), and the ground surface will be restored to pre-excavation conditions, consisting of a 6-inch surface cap of asphalt.

Remaining areas of the 8801 property which will not be excavated but have COCs above the remediation levels or saturated soil CULs will be capped to prevent infiltration of stormwater and migration of COCs from soil to groundwater. The 8801 property is currently paved with concrete and asphalt; therefore, the cap will consist of improving the surface cover with about an additional 2-inch-thick layer of asphalt.

Groundwater Remediation

The groundwater remedial actions include excavation of TCE-impacted soil from an area located near the north property boundary, totaling approximately 4,400 square feet (less than 1 percent of the 8801 property area). The excavation will extend to approximately 4 feet bgs (this depth may be extended to groundwater to allow for additional removal of TCE-impacted soil if base or sidewalls contain noticeable TCE odors). The excavation is expected to remove approximately 956 tons of soil of which 860 tons will be disposed of as non-hazardous waste at a Subtitle D landfill; the remaining 96 tons of material will be disposed of as hazardous waste at a Subtitle C landfill.

The excavated soil will 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 other groundwater remedial actions may result in additional small areas of soil disturbance and removal associated with expansion of the existing AS/SVE system, installation of injection points, and installation of the "grout curtain" in the northwestern corner of the 8801 property.

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

The soil cleanup action will 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 will be limited by implemention of a project-specific temporary erosion and sediment control plan including standard best management practices.

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

The site is currently about 95 percent impervious surface, and will be returned to that condition after project implementation.

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

A site-specific Stormwater Pollution Prevention Plan (SWPPP) already exists for the current operations at the site. The Best Management Practices (BMPs) associated with the SWPPP are required to be maintained by the existing operator, and will continue to be utilized during the proposed project along with any updates as part of compliance with the project-specific NPDES Construction Stormwater General Permit. A temporary erosion and sedimentation control plan, including BMPs, associated with the excavation work, will 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 [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.

Short-term, temporary air emissions from equipment during construction, such as vehicle exhaust and possible dust, may occur. The asphalt used to cap the remediation areas also emits toxic fumes for a short duration that can irritate eyes, nose, and lungs, and can cause burns and other skin damage if it comes into contact with skin.

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 will 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 footprint of the proposed future building overlies part of the halogenated VOC groundwater plume. Since the remediation of the halogenated VOC plume will not

be completed prior to the proposed construction, sub-slab depressurization beneath the affected area of the western side of the building has been selected to remove the pathway to the indoor air of the building. The sub-slab depressurization system will include a blower which will discharge from the roof of the future building. It is anticipated that the emissions from the blower will be below de mimimus 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 proposed project.

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

During construction, standard BMPs will 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 reduce the potential for air quality impacts at the 8801 property.

3. Water [help]

- a. Surface Water: [help]
 - 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 site fronts 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 soil and groundwater remediation activities described above will 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 will be conducted waterward of the ordinary high water mark, and the site 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 8.4 feet determined) are generally on the waterward of the site's sheet-pile bulkhead but mapping shows it extending onto the site 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.

There will be no discharge of waste materials to surface waters.

b. Ground Water: [help]

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.

Groundwater will not be withdrawn from a well for drinking water purposes. Groundwater samples will be collected after remedial activities have been initiated to verify that the activities are reducing concentrations of COCs in groundwater. Groundwater sampling will continue after the remediation activities have been completed to extract samples for ongoing performance and compliance monitoring.

The remediation actions include injection of a variety of media into contaminated groundwater under an underground injection permit.

In the northeastern portion of the halogenated VOC plume, carbon (an edible and non-toxic emulsified soybean oil mixture) and bacteria (*Dehalococcoides sp.*) will be injected to enhance the natural breakdown of the halogenated VOCs. Injections will occur at an estimated 157 injection points. Each injection is essentially a four-step process consisting of injection of the soybean oil mixture (oil and water), injection of anaerobic water, injection of the bacteria, and a final injection of anaerobic water.

Extension of the existing groundwater AS/SVE west of the current alignment will 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.

In the northwest corner of the 8801 property, ISCO has been selected to address TPH and halogenated VOCs within soil and groundwater. ISCO involves injection of an oxygen-containing compound mixed with water to accelerate the naturally occurring remediation of the TPH and halogenated VOCs that degrade more rapidly in an oxygen-rich environment. Because of the proximity of this area to the river, and the characteristics of the existing sheet pile wall, injection will be preceded by installation of a "grout curtain" to 20 feet bgs. This grout curtain will prevent migration of the media into the river.

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 will be discharged into the ground as part of this 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 is from stormwater falling on the site's extensive impervious surfaces. Two main storm systems drain the 8801 property and discharge to the LDW as 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. A remedial action that may affect stormwater during injection work is temporary closure of lines and diversion of stormwater around the closed portion. Stormwater system alterations related to the proposed redevelopment are addressed in a separate SEPA checklist.

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

The primary potential pollutants are sediment from disturbed soils, petroleum products used by construction equipment, and fill materials (asphalt and compacted inert fill). The discharge of potential waste materials into ground and surface water will be minimized through use of BMPs during construction.

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

The project will maintain existing drainage patterns on and in the vicinity of the site.

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 project activity. No additional measures are necessary. If unexpected conditions arise during construction, the contractor will adaptively manage the site consistent with the *King County Surface Water Design Manual* and the NPDES Construction Stormwater General Permit.

4. Plants [help]

- a. Check the types of vegetation found on the site:
 - <u>X</u> deciduous tree: alder, maple, aspen, other (<u>a few unidentified trees around the</u> <u>administration building as part of landscape and one at shoreline edge, possibly</u> weeping willow)
 - <u>X</u> evergreen tree: <u>fir, cedar, pine</u>, other (<u>a few around the administration building as</u> <u>part of landscape</u>)
 - X shrubs (invasive Himalayan blackberry, landscape plantings)
 - <u>X</u> grass (<u>a few maintained areas along East Marginal Way and around the</u> <u>administration building at the east end of the site</u>)
 - ____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 will 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 site.

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.

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 [help]

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.

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

__X__ mammals: beaver, other: rats, mice, raccoon

__X__ fish: <u>salmon, trout</u>

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 site. 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 site. 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.

The U.S. Fish and Wildlife Service's Information for Planning Consultation species report for the project area also identifies potential for gray wolf, North American wolverine, marbled murrelet, streaked horned lark, and yellow-billed cuckoo to be present in the area. Based on existing habitat conditions on-site and in the vicinity, only the marbled murrelet is likely to be found in the area and generally only flying over the site 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.

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

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

The proposed site remediation will benefit aquatic habitat and the fish and other wildlife that rely on the water by reducing upland COCs. No fish or wildlife habitats would be affected by the proposal 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. 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 river: *Grandidierella japonica*, *Sinelobus stanfordi*, and *Nippoleucon hinumensis*.

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.

Once the new remediation actions are in place, they do 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 sub-slab depressurization system which is proposed to be installed is wind activated and does 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 [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.

During construction, there are standard risks associated with construction equipment operation, such as accidental spills.

As mentioned previously, 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 implementation of the proposed project, construction workers could be exposed. For this reason, only appropriately-trained individuals will be utilized to complete the project. These appropriately trained individuals will wear appropriate personal protective equipment and follow requirements in a site health and safety plan.

Following completion of the remedial action, the proposed project will result in reduced potential for exposure at the 8801 property.

The proposed project is intended to remediate long-term environmental hazards to human health as well as fish and wildlife.

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

See response to question A.11 and B.7 a above.

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 entire project is designed to remediate on-site hazardous substances. During remedial actions, the proposed excavations may increase in size based on analytical results collected during the work and the quantity or timing of injections may vary based on groundwater chemical data. The western footprint of the proposed future building to be constructed during redevelopment (not included within this SEPA checklist) overlies part of the halogenated VOC

groundwater plume. Because remediation of the halogenated VOC plume will not be completed prior to construction of the proposed future building, sub-slab depressurization has been included within the project design to remove the pathway to the indoor air of the building.

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 water, bacteria, and emulsified soybean oil injection mixtures are all nontoxic and non-hazardous. The product used in the ISCO injection area at the northwest corner of the property is a hazardous chemical, but is safe when manufacturer's recommendations for proper storage and handling are followed.

Other toxic or hazardous chemicals that might be stored or used during the project's construction or operation are limited to diesel, oil, and/or gasoline used by construction equipment and vehicles. The asphalt used to cap the remediation areas also emits toxic fumes for a short duration that can irritate eyes, nose, and lungs, and can cause burns and other skin damage if it comes into contact with skin.

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

Following construction, there will be no other anticipated toxic or hazardous chemical use, except for routine asphalt sealing or resurfacing.

4) Describe special emergency services that might be required.

No special emergency service needs are anticipated for this project.

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

The project will comply with a project-specific detailed health and safety plan that includes requirements for managing on-site toxic and hazardous substances and emergency procedures. The project will also comply with a project-specific Spill Prevention, Control and Countermeasures Plan and include best management practices.

b. Noise

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

The project site and vicinity are 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 will not affect the proposed 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 proposed project includes 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 generating the most noise is 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 AS/SVE system is currently operating and no new noise source will result from the work. 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 will keep construction equipment's mufflers and exhaust systems in good operating condition.

8. Land and Shoreline Use [help]

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 is currently vacant, but has been and will continue to be in industrial use. The proposed project will not affect current land uses 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?

Since at least the 1920s, the site has been in industrial use as shown in the cultural resources review (Stell, 2019, see response to question A.8 for full citation).

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 site vicinity. 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 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 will be demolished as part of the proposed project. Demolition and redevelopment of the 8801 property will likely be taking place concurrently with this remediation project, but the demolition and redevelopment project is covered under a separate SEPA checklist submitted by the developer.

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 upland portion of the site 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 only on-site critical area is the LDW, a Type S (Shoreline of the State) water.

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

The remediation activity will not generate any structures or facilities that would house or employ people permanently.

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 nearby that have a long-term commercial significance, so no measures are proposed.

9. Housing [help]

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 [help]

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 proposed project would not alter or obstruct views.

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

No measures necessary.

11. Light and Glare [help]

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

The proposed remediation project will 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 will 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 will affect this project.

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

No measures are necessary.

12. Recreation [help]

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

There are no designation recreational opportunities in the immediate vicinity. 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 [help]

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 site 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" (Stell, 2019, see response to question A.8 for full citation). None of these structures will be affected by the remedial work to be implemented under the proposed Interim Action Work Plan.

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 site 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."

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 this 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) will be prepared and implemented during project activity, and additional consultation with Tribes and other interested parties will be conducted. The MIDP will include 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 [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.

The primary access to the site 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 site 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.

Water and air transportation would not be utilized by the project. 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 remediation work there will be a temporary increase in traffic as trucks remove excavated soil off-site; however, there will be no long-term impact to traffic patterns. After remediation activities are completed, there will be limited trips throughout the year to monitor the performance and compliance monitoring wells.

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 will 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 necessary.

- 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.

The project will 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 [help]

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

c. 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 will not permanently add or alter any utilities. Some BMPs installed to minimize potential for movement of contaminants to the LDW may be temporarily installed in the stormwater system during implementation of the project.

C. Signature [HELP]

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.

mian Haderty Signature:

Name of signee Brian Haderlie

Position and Agency/Organization _Environmental Engineer, PACCAR Inc

Date Submitted: 7/24/



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000 711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

STATE ENVIRONMENTAL POLICY ACT DETERMINATION OF NONSIGNIFICANCE

8801 E MARGINAL WAY S

Date of issuance: August 9, 2019

Lead agency: Washington Department of Ecology, Toxics Cleanup Program, Northwest Regional Office (Ecology)

Agency contact: Erin Hobbs <u>ehob461@ecy.wa.gov</u> 425-649-7231

Description of proposal: The project will address upland contamination by historic industrial operations at the 8801 E Marginal Way S site (Site). Proposed cleanup actions for soil and groundwater remediation include, excavation of hot-spots of contaminated soil throughout the site, injection of an edible and non-toxic emulsified soybean oil mixture and bacteria to enhance the natural breakdown of volatile organic compounds, injection of an oxygen-containing compound to treat petroleum hydrocarbons and volatile organic compounds, expansion of an air sparge/soil vapor extraction system, and institutional controls.

The project is required by Ecology under authority of Washington's cleanup regulation, the Model Toxics Control Act (Chapter 173-340 WAC). The project is described in a draft Interim Action Work Plan, in accordance with Agreed Order DE 6069 between Ecology, PACCAR Inc., and CenterPoint 8801 Marginal LLC.

Location of proposal: 8801 East Marginal Way South, Tukwila, Washington 98108

Applicant/Proponent: Brian Haderlie PACCAR Inc. PACCAR Building 777 106th Avenue NE Bellevue, WA 98004 (485) 468-7055

Determination: Ecology reviewed the attached State Environmental Policy Act Environmental Checklist and the draft Cleanup Action Plan located on the 8801 E Marginal Way S site webpage

(https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=5056). We have determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement is not required under RCW 43.21C.030(2)(c).

This determination is based on the following findings and conclusions:

- Best management practices will be employed to prevent potential adverse environmental impacts associated to construction operations.
- The proposed site remediation is intended to ultimately benefit the environment by reducing upland contamination.

Comment period: The comment period for Ecology's determination ends on October 9, 2019. This corresponds with a 45-day public comment period on the draft Remedial Investigation, draft Feasibility Study, and draft Interim Action Work Plan.

Responsible official: Robert W. Warren Regional Manager Northwest Regional Office Toxics Cleanup Program Department of Ecology 3190 160th Avenue SE Bellevue, WA 98008-5452 425-649-7054

Signature

8 Date