CB/NT file
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Hylebos Cleanup Committee

Authorized Representative: Alastair J.H. McGregor, Chairman
c/o Glen Springs Holdings, Inc., 1795 Baseline Road • Grand Island, NY 14072-2010
Telephone (716) 773-8311 (FAX 716 773-8333)

February 5, 1998

RECEIVED
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Environmental Cleanup Office

Hylebos Property Owner
Hylebos Waterway Cleanup Site

Re: Hylebos Waterway Pre-Remedial Design
Remedial Options for Your Property

Dear Property Owner

The Hylebos Cleanup Committee (HCC) has been working with the U.S. Environmental Protection Agency (EPA) since 1993 to develop a cleanup plan for the Hylebos Waterway, part of the Commencement Bay Nearshore / Tideflats Superfund Site. In December 1997 the HCC submitted two revised draft documents to EPA that identify cleanup areas in Hylebos Waterway and lay out options for dredging and sediment disposal (*Round 1 Data Evaluation Report, Preliminary Disposal Site Evaluation Report*). Those documents identified intertidal and/or subtidal sediments located on your property that require cleanup or natural recovery. The attached Table A presents the Hylebos sediment testing results that exceed criteria, for stations not located on an HCC member's property.

The HCC will be working with EPA to develop the final cleanup plan for Hylebos Waterway. As part of that process the HCC invites your input on the cleanup options to consider for your intertidal and subtidal property on Hylebos Waterway. The primary cleanup options under consideration are removal and/or in-place capping of contaminated sediment. Factors to consider in the selection process include 1) the effectiveness of the action on remediating the impacted sediment; 2) the cost of implementing the remedial options; and 3) the ease or difficulty of implementing each method. Your input on the current and planned future uses of your intertidal and subtidal property, physical constraints to cleanup, as well as your remediation preference, will be valuable input into the evaluation of these factors.

Attached to this letter are figures and tables from the HCC's December 8, 1997 draft reports that relate to your property. Once you have reviewed that information, please contact Paul Fuglevand, the HCC's project coordinator (phone 425 486-7905, or fax 425 486-7651), and set up a time to meet with him. We have asked Paul Fuglevand to complete the meetings with property owners by mid-March, so we ask that you make your initial contact with him no later than February 20, 1998.

Should you have any questions or comments, please contact either Paul Fuglevand or myself.

Regards,

A. J. H. McGregor

Alastair J.H. McGregor, Chair

cc: Allison Hiltner, EPA
Russell McMillan, Ecology
Robert A. Taylor, NOAA

Attached: Distribution List, Table A, Figures

USEPA SF
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DISTRIBUTION LIST

Jones Goodell
1690 Marine View Drive
Tacoma, WA 98422

J & G Investments
Nancy K. Miller
5400 Meeker Drive, #21
Kalama, WA 98625

Manke Lumber
John Mc Bride
1717 Marine View Drive
Tacoma, WA 98422

McGavick Graves
Gregory A. Jacoby (Manke Lumber)
PO Box 1317
Tacoma, WA 98401-1317

Tacoma Boat Building
Ray Nichols
1840 Marine View Drive
Tacoma, WA 98422

USG Interiors
Frank May
125 S. Franklin Street
Chicago, IL 60606

George, Hull, Porter & Kohli
Terry Hall (USG Interiors)
1301 5th Ave, Suite 2160
Seattle, WA 98101

Weyerhaeuser Lumber
John Gross
CH1K29
Tacoma, WA 98477-0001

Weyerhaeuser Lumber
Kim Hughs
CH2J28
Tacoma, WA 98477-0001

Grahmn & Jones
Lauren Dun (Bufflen Woodworking)
1001 4th Plaza, Suite 4500
Seattle, WA 98154-1065

Bufflen Woodworking
Joe Guizzetti
PO Box 1383
Tacoma, WA 98401

Murray Pacific
Chuck Shenk
3502 Lincoln Ave East
Tacoma, WA 98421

Ole & Charles Marina
Ron Oline
1940 Marine View Drive
Tacoma, WA 98422

J. Simons & Sons
Mark Burley
2200 East River Street
Tacoma, WA 98421

Gordon, Thomas, Honeywell
Brad Jones (Sound Refining)
PO Box 1157
Tacoma, WA 98401

Sound Refining
Ray Burke
2628 Marine View Drive
Tacoma, WA 98422

Taylor Way Properties
Ralph Hagler
101 Elliott Avenue West, Suite 330
Seattle, WA 98110

Puyallup Indian Tribe Marina
Robert Young
2002 East 28th Street
Tacoma, WA 98404

Table A. Sediment Testing Results for Hylebos Stations Exceeding Hylebos AOC Criteria, For Stations Not Located on HCC Member's Property.

Station	Location	Property Owner	PCBs ug/kg	# of Chem. > SQO	Three Chemicals with the Highest Exceedance Factors (EF)[a]	Bioassays			Benthic Abundance	Testing Conclusion[b]	Cleanup Conclusion[b]
						Amph.	Larval	*Neanthes*			
1105S	Subtidal	Manke Lumber	124	1	Zinc	Pass	Pass	AOC/SQS	Not tested[c]	AOC/SQS	PNR
1120S	Subtidal	Weyerhaeuser Lumber	132	3	Benzofluors., BAP, Chrysene	Pass	AOC/SQS	Pass	Not tested	AOC/SQS	PNR
1212I	Intertidal	J&G Investment	100	2	DMP, Copper	MCUL	MCUL	MCUL	Not tested	MCUL	PR
1213I	Intertidal	Manke Lumber	31U	1	Arsenic	Pass	AOC/SQS	Pass	Not tested	AOC/SQS	PR[b1]
1216I	Intertidal	Tacoma Boat Buildiing	28U	5	Zinc, Arsenic, Copper	Pass	AOC/SQS	Pass	Not tested	AOC/SQS	PR[b2]
1217I	Intertidal	Tacoma Boat Building	25U	5	Arsenic, Zinc, Copper	Pass	MCUL	Pass	Not tested	MCUL	PR
2201SM	Intertidal	USG Interiors	21U	5	Zinc, Arsenic, Antimony	-------- Not Tested --------			Not Tested	SQO EF>2	PR
2202I	Intertidal	USG Interiors	110J	13	Zinc, Arsenic, Antimony	Pass	MCUL	Pass	Not tested	MCUL	PR
3202SM	Intertidal	Bufflen Woodworking	111	2	Arsenic, N-nitrosodiphenylamine	-------- Not Tested --------			Not Tested	SQO EF>2	PR
3208SM	Intertidal	Murray Pacific	35U	1	Arsenic	-------- Not Tested --------			Not Tested	SQO EF>2	PR
3210I	Intertidal	Murray Pacific	181	2	Arsenic, Zinc	Pass	Pass	Pass	Not tested	Pass	PR[b2]
3214I	Intertidal	R. & B. Oline	333	18	Zinc, BBP, HCBD	Pass	Pass	Pass	Not tested	Pass	PR[b2]
3218SM	Intertidal	R. & B. Oline	1710	22	B(2-ethylhexyl)P, Zinc, BBP	-------- Not Tested --------			Not Tested	PCBs	PR
3221I	Intertidal	Sound Refining	24U	3	Arsenic, Zinc, Copper	Pass	MCUL	Pass	Not tested	MCUL	PR
4107S	Subtidal	Taylor Way Properties	636	2	Bis(2-ethylhexyl)phthalate, PCBs	Pass	AOC/SQS	Pass	MCUL	MCUL, PCBs	PR
4117S	Subtidal	Taylor Way Properties	2900	3	PCBs, Arsenic, Zinc	Pass	Pass	Pass	Not tested	PCBs	PR
4118S	Subtidal	Taylor Way Properties	2800	1	PCBs	-------- Not Tested --------			Not Tested	PCBs	PR
4204I	Intertidal	Taylor Way Properties	1845	1	PCBs	-------- Not Tested --------			Not Tested	PCBs	PR
4205I	Intertidal	Taylor Way Properties	1370	9	Arsenic, PCBs, Zinc	-------- Not Tested --------			Not Tested	PCBs	PR
4206I	Intertidal	J. Simons & Sons	240	1	Bis(2-ethylhexyl)phthalate	Pass	AOC/SQS	Pass	Not tested	AOC/SQS	PR[b1]
4207I	Intertidal	Sound Refining	23U	5	Arsenic, Copper, Zinc	MCUL	MCUL	MCUL	Not tested	MCUL	PR
5110S	Subtidal	Puyallup Tribe Marina	155	1	HCBD	Pass	AOC/SQS	Pass	Pass	AOC/SQS	PNR

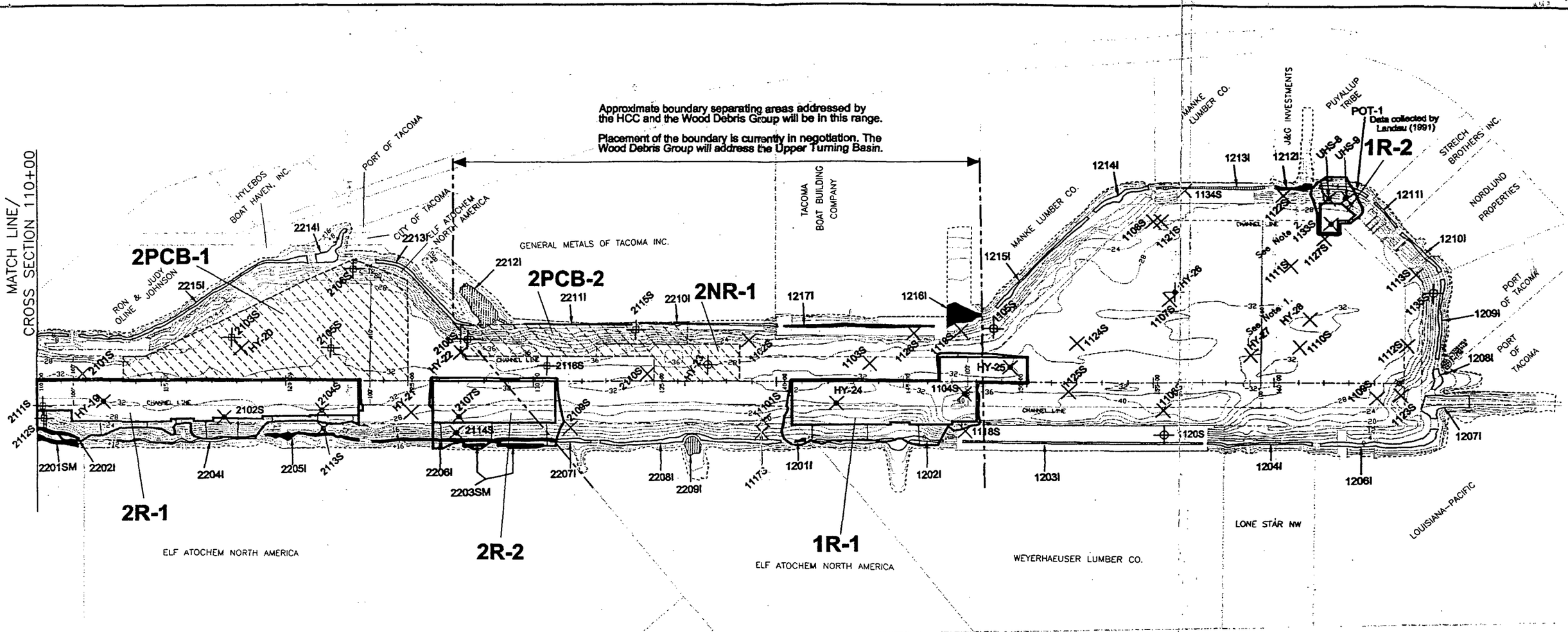
[a] Chemical Definitions and abbreviations:
DMP = Dimethylphthalate
BAP = Benzo(a)pyrene
B(2-ethylhexyl)P = Bis(2-ethylhexyl)phthalate
BBP = Butylbenzylphthalate
HCBD = Hexachlorobutadiene

[c] Not Tested: Benthic testiing not performed due to debris in sediment at station.

[b] Testing and Cleanup Conclusions:
SQO EF>1 and <2 - Chemical exceedance factor between 1 and 2 and no biological data available
SQO EF>2 - Chemical exceedance factor exceed 2 and no biological data available
AOC/SQS - Biological exceedance of AOC and SMS SQS criteria
MCUL - Biological exceedance of MCUL criteria or two exceedances of AOC/SQS criteria. If results were available for the two chronic effects tests (*Neanthes* and benthic abundance), the more conservative of the two responses was used in the evaluation.
PCBs - PCBs 301-450 (potential natural recovery), PCBs>450 ppb, dry weight (potential remediation).

PR = Potential Remediation. (**b1**: Potential natural recovery not addressed for intertidal stations, assumed potential remediation).
PNR = Potential Natural Recovery. Based on the evaluation of the potential for natural recovery, this station is expected to naturally recover within 10 years.

b2 Intertidal station with chemicals that exceed an SQO which is set by a benthic AET and that also have 2LAET/AET ratios for those chemicals that exceed 2.0. As stated in the Event 1C Phase III SAP, evaluation of intertidal stations that have one or more SQO exceedances of chemicals for which the SQO was set by a benthic AET and with 2LAET/AET ratios greater than 2.0 will include consideration of the existing chemical and biological data for these stations and adjacent stations, comparison of sediment chemistry data to SQOs, and the nature of the shoreline conditions at the stations that potentially alter or limit the establishment of benthic infauna communities typically found in intertidal sediments (e.g., sediment type, physical disturbance, docks and wharves, riprap and other erosion protection).



SEDIMENT MANAGEMENT AREAS

5R-1 Possible MCUL Dredging Area

5N-1 Possible AOC/SQS Dredging Area

2PCB-2 PCB Natural Recovery Areas (300-450 ug/kg PCB's)

2NR-1 Ecological Natural Recovery Area

SAMPLING RESULTS

Intertidal Composites		Subtidal Stations
	and	No criteria exceedances
	and	Chemistry SQO EF >1 and <2 with no biological data; or with an AOC/SQS biological exceedance; and PCBs <450 ppb
	and	No chemical and/or no biological exceedances and PCBs >300ppb and <450 ppb
	and	Chemistry SQO EF>2 with no biological data; and PCBs <450 ppb
	and	Chemistry SQO EF>2 with no biological data; or with an MCUL biological exceedance; and/or PCBs >450 ppb

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0 400 800
SCALE IN FEET

1. Stations HY-27 & HY-28 No criteria exceedances per EPA's February 16, 1996 letter (HILTNER 1996)
2. Station 1133S has no chemical or benthic exceedance, but has an MCLU bioassay exceedance.

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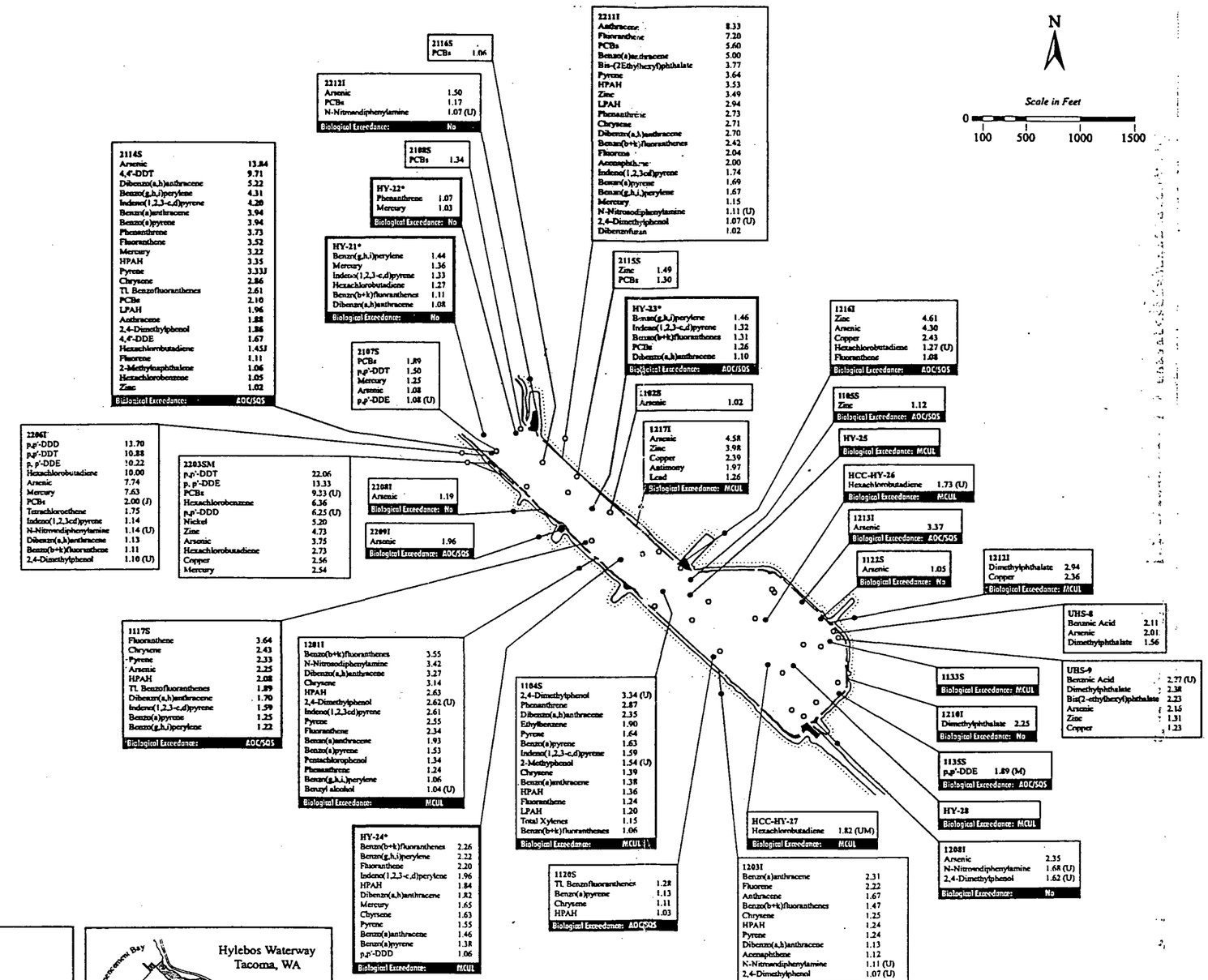
Figure 7-5c
Possible Dredging & Natural Recovery Areas at the Head of Hylebos Waterway

Figure 5-14c

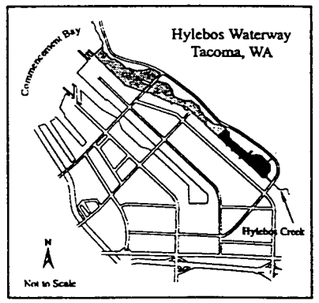
Exceedance Factors and Biological Results at the Head of Hylebos Waterway



LEGEND

- Biological Data
- No Biological Data

Note: Exceedance factors are based on EPA's Revised PCBs criterion, EPA's porewater TBT cleanup level, and ROD SQOs.



*Note: The use of Trustee chemical data is required by EPA subject to the HCC's objection as described in the HCC's April 5, 1996 Response to EPA Comments. Use of the Trustee chemical data in this document should not be read to imply that the HCC agrees with its use.

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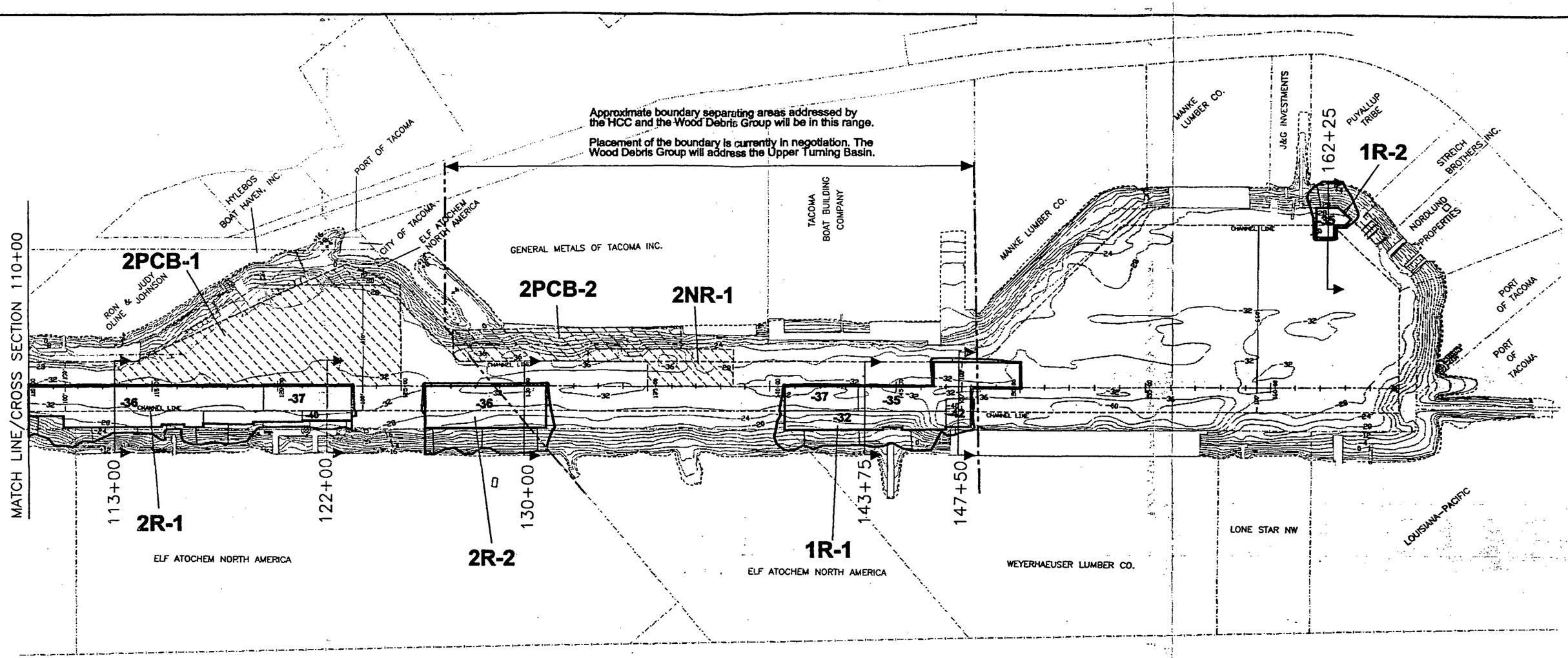

SEDIMENT MANAGEMENT AREAS

5R-1	Possible MCUL Dredging Area	2PCB-2	PCB Natural Recovery Areas (300-450 ug/kg PCB's)
5N-1	Possible AOC/SQS Dredging Area	2NR-1	Ecological Natural Recovery Area

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0 400 800
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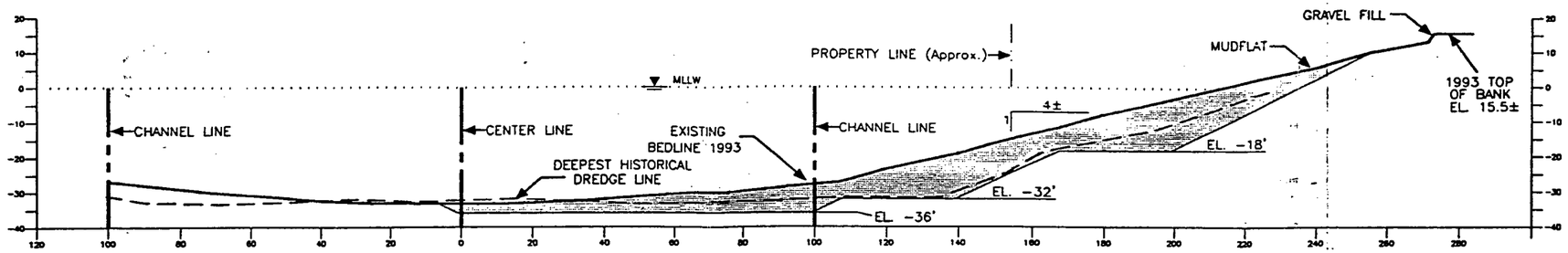
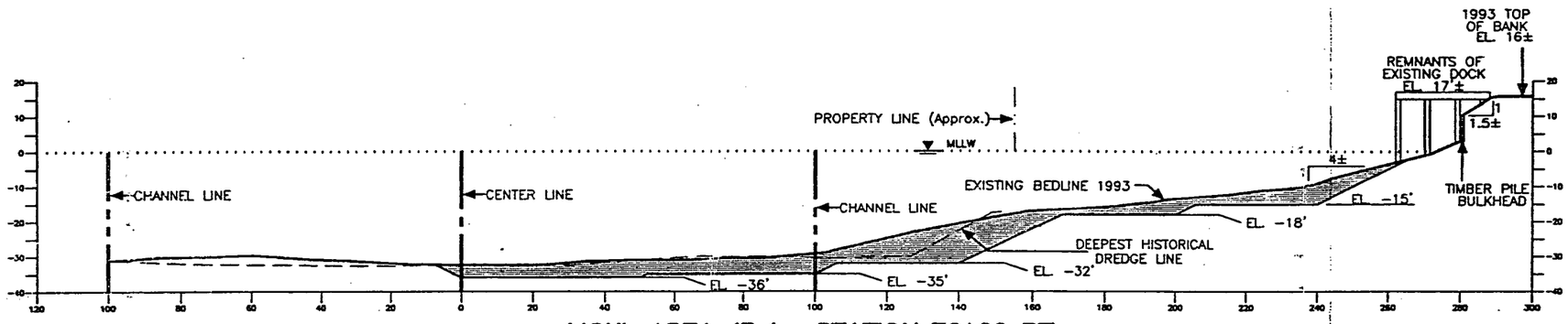
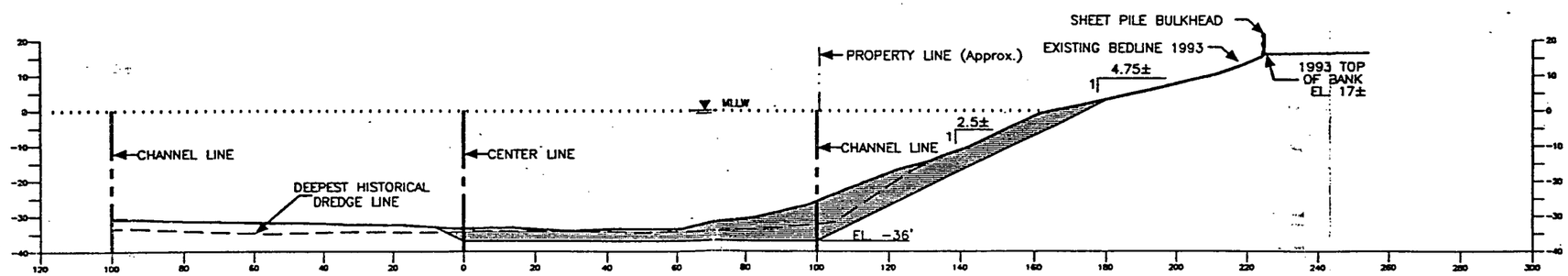
Figure C-4
Preliminary Dredge Plan at the Head of Hylebos Waterway



MCUL AREA 4R-1 STATION 70+00 RT



MCUL AREA 4R-1 STATION 76+00 RT



MCUL AREA 3R-1 STATION 95+00 RT

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Scale 1"= 40' 1V=1H
Dredge Slope = 1V:2H

General Notes:
1. —— Indicates assumed 1993 existing bedline under docks and structures.
2. — — Indicates deepest historical dredge line and data extents.
3. ▒ Indicates dredge area.

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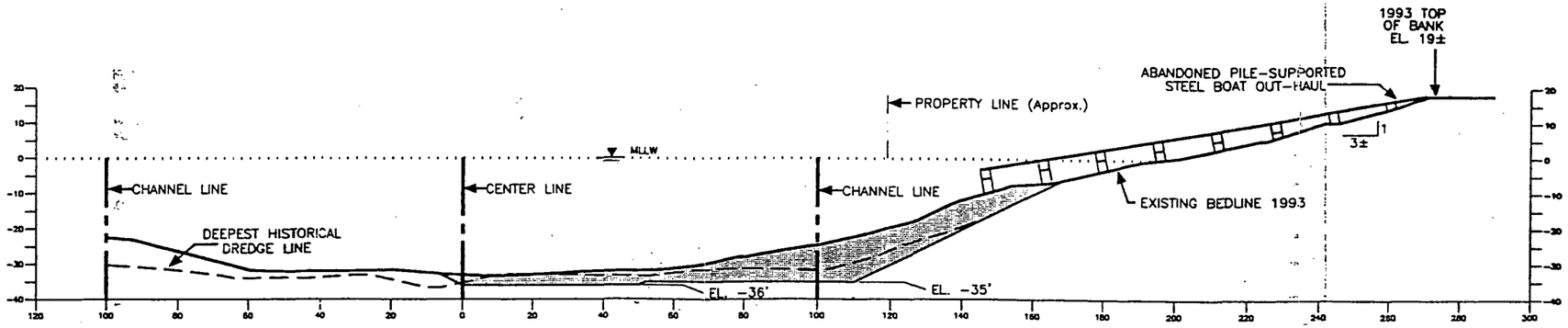
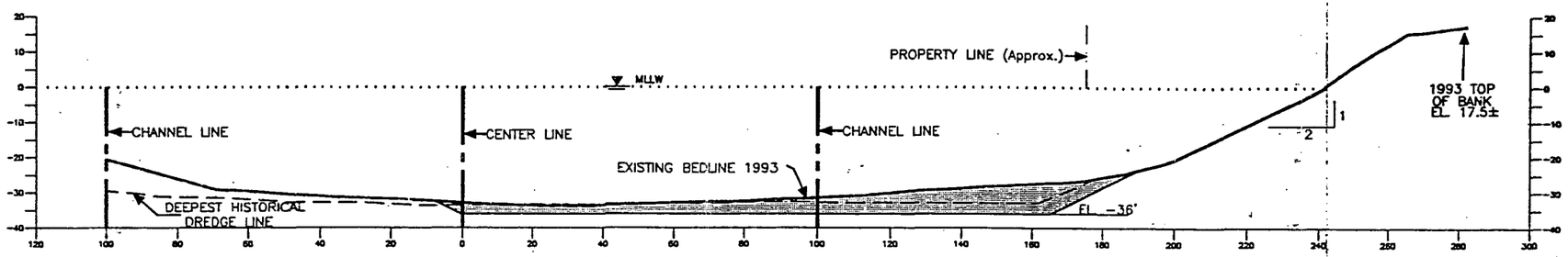
DRAWING: SECT87P1 DATE: 12/1/87

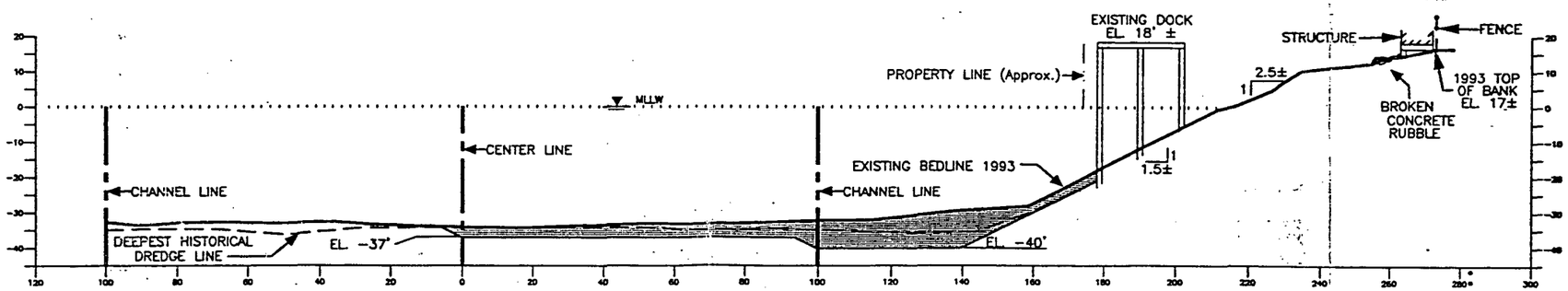
Figure C-7.
Preliminary Dredging Plan
Hylebos Waterway
Cross Sections



MCUL AREA 3R-2 STATION 103+20 RT



MCUL AREA 2R-1 STATION 113+00 RT



MCUL AREA 2R-1 STATION 121+00 RT

Scale 1"= 40' 1V=1H
Dredge Slope = 1V:2H

General Notes:
1. —— Indicates assumed 1993 existing bedline under docks and structures.
2. — — Indicates deepest historical dredge line and data extents.
3. ▒ Indicates dredge area.

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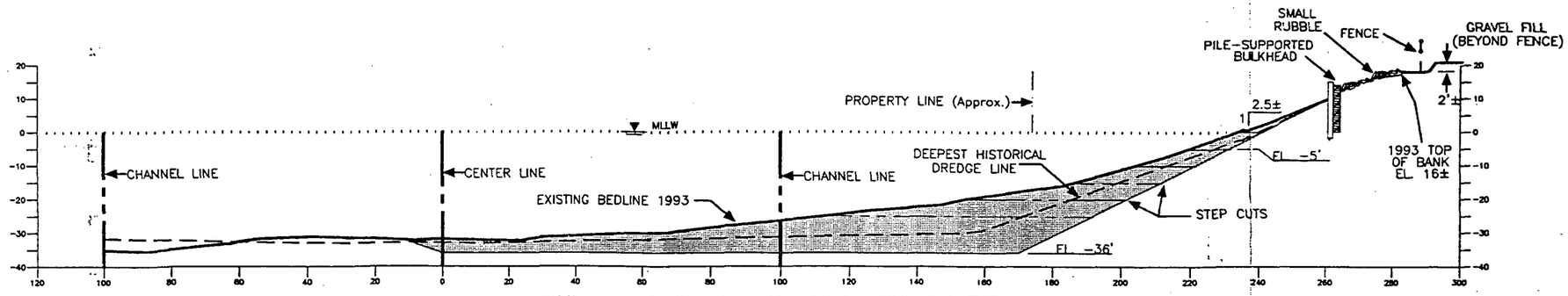
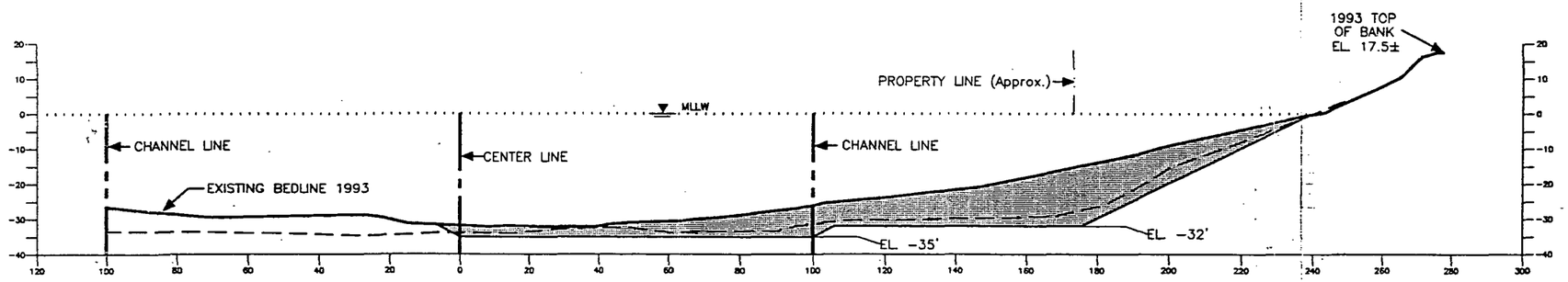
DRAWING: SECT97P2 DATE 12/1/97

Figure C-8.
Preliminary Dredging Plan
Hylebos Waterway
Cross Sections



MCUL AREA 2R-2 STATION 130+00 RT



MCUL AREA 1R-1 STATION 143+75 LT

Scale 1"= 40' 1V=1H
Dredge Slope = 1V:2H

General Notes:
1. —— Indicates assumed 1993 existing bedline under docks and structures.
2. — — Indicates deepest historical dredge line and data extents.
3. ▒ Indicates dredge area.

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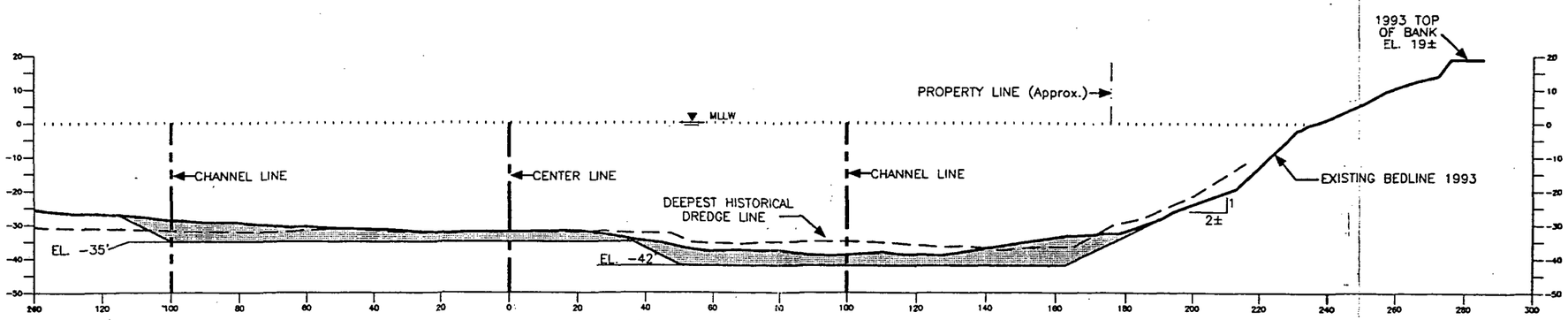
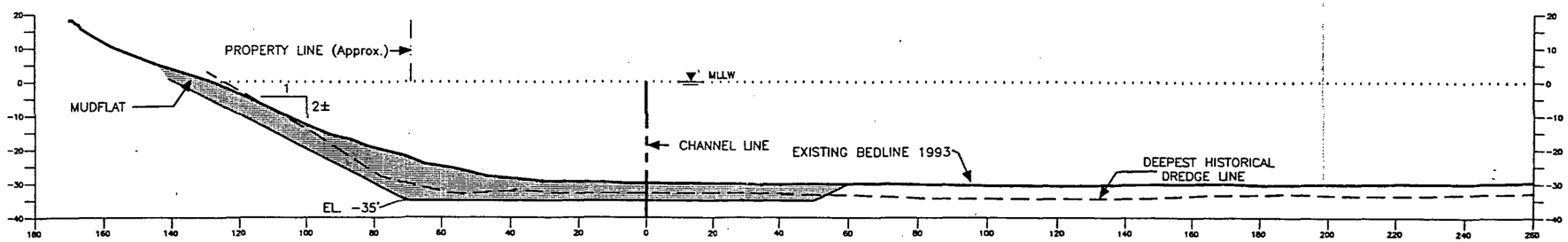
Figure C-9.
Preliminary Dredging Plan
Hylebos Waterway
Cross Sections



MCUL AREA 1R-1 STATION 147+50 RT



MCUL AREA 1R-2 STATION 162+50 LT

Scale 1"= 40' 1V=1H
Dredge Slope = 1V:2H

General Notes:
1. —— Indicates assumed 1993 existing bedline under docks and structures.
2. — — Indicates deepest historical dredge line and data extents.
3. ▒ Indicates dredge area.

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Figure C-10.
Preliminary Dredging Plan
Hylebos Waterway
Cross Sections

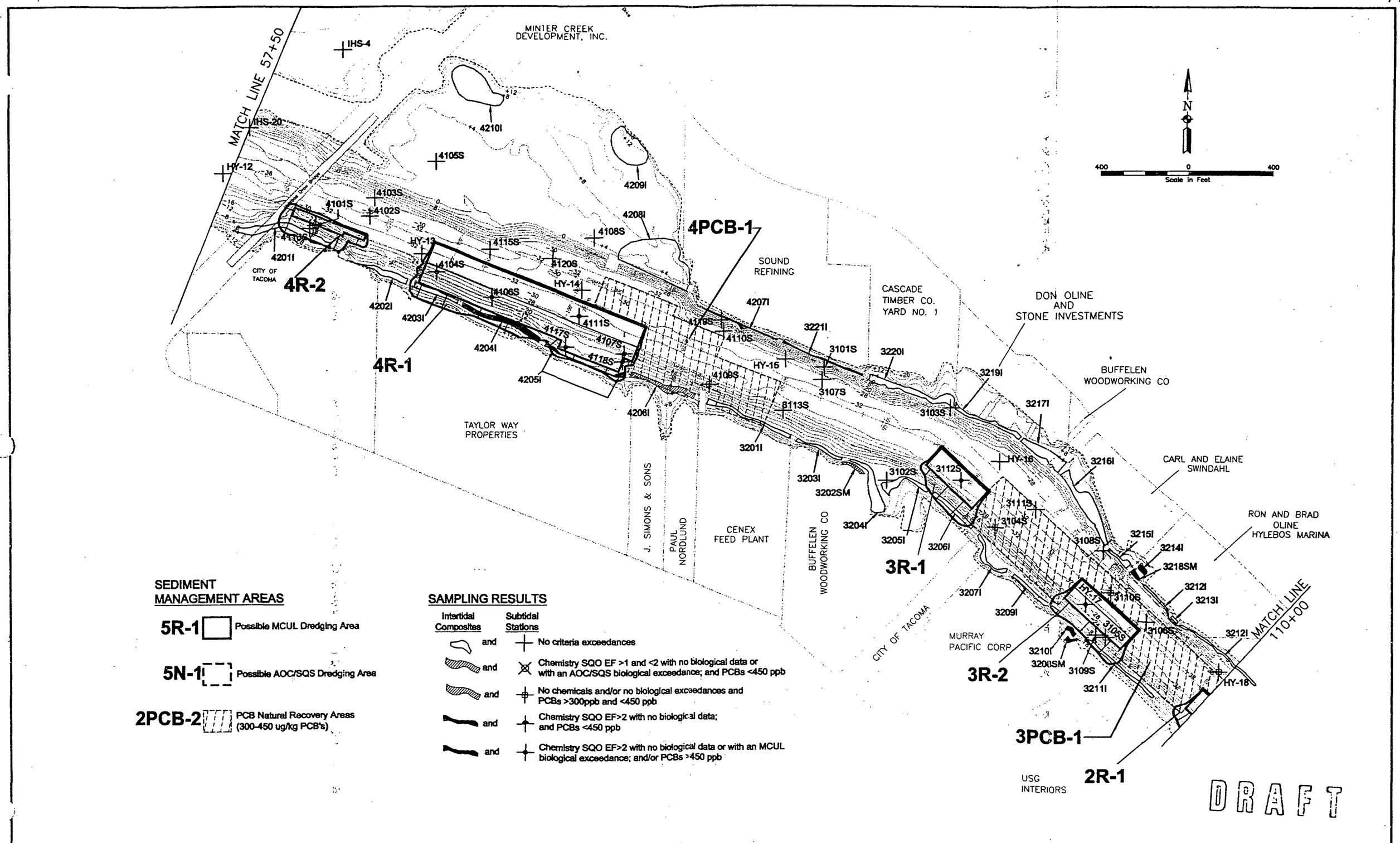

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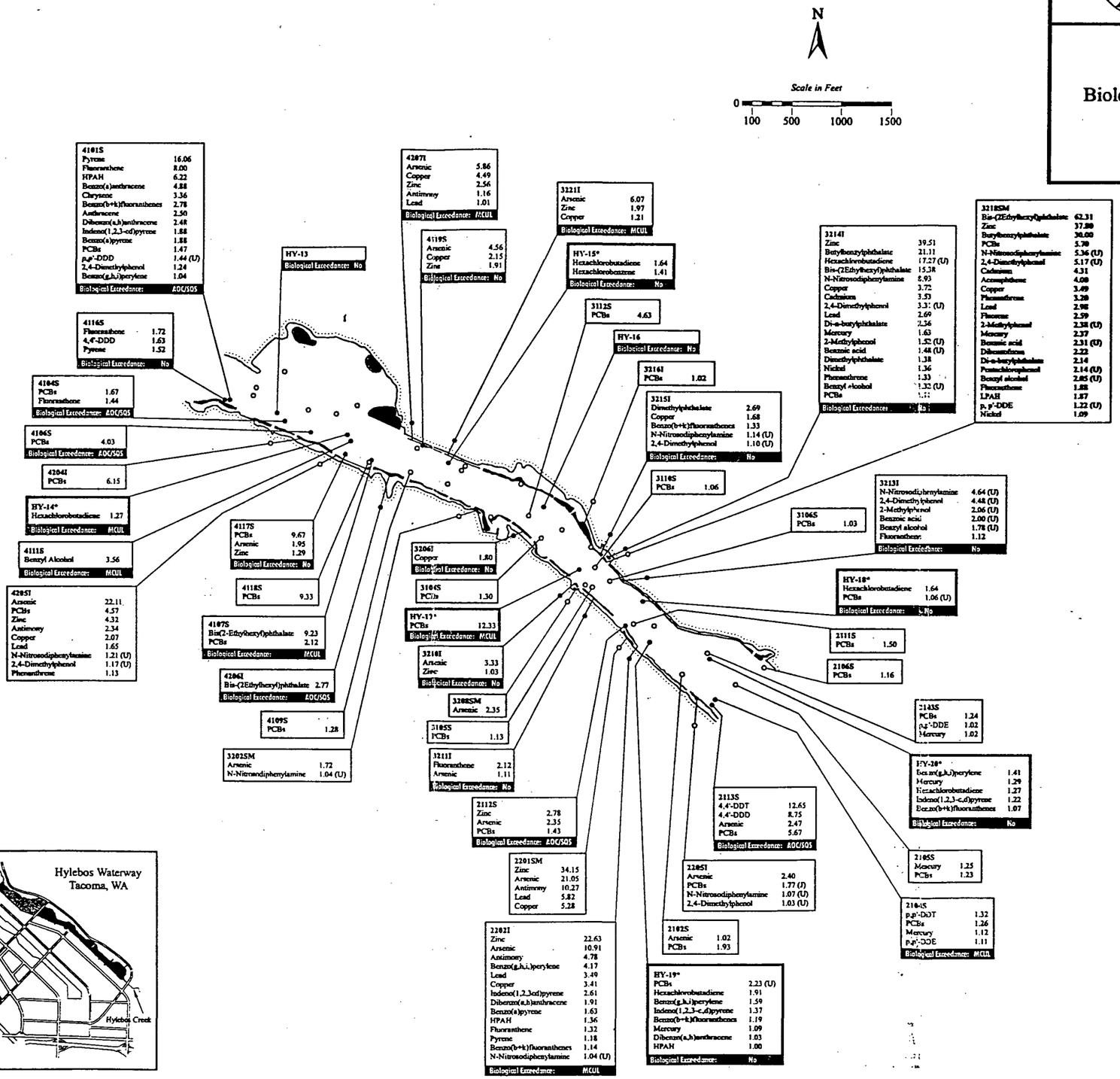
Figure 7-5b
Possible Dredging & Natural Recovery Areas at the Middle of Hylebos Waterway

Figure 5-14b

Exceedance Factors and Biological Results at the Middle of Hylebos Waterway



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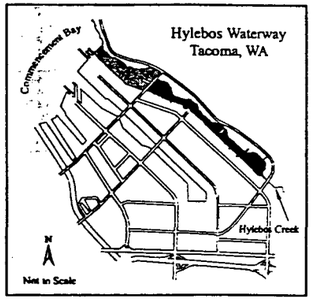
LEGEND

- Biological Data
- No Biological Data

Note: Exceedance factors are based on EPA's Revised PCBs criterion, EPA's porewater TBT cleanup level, and ROD SQOs.



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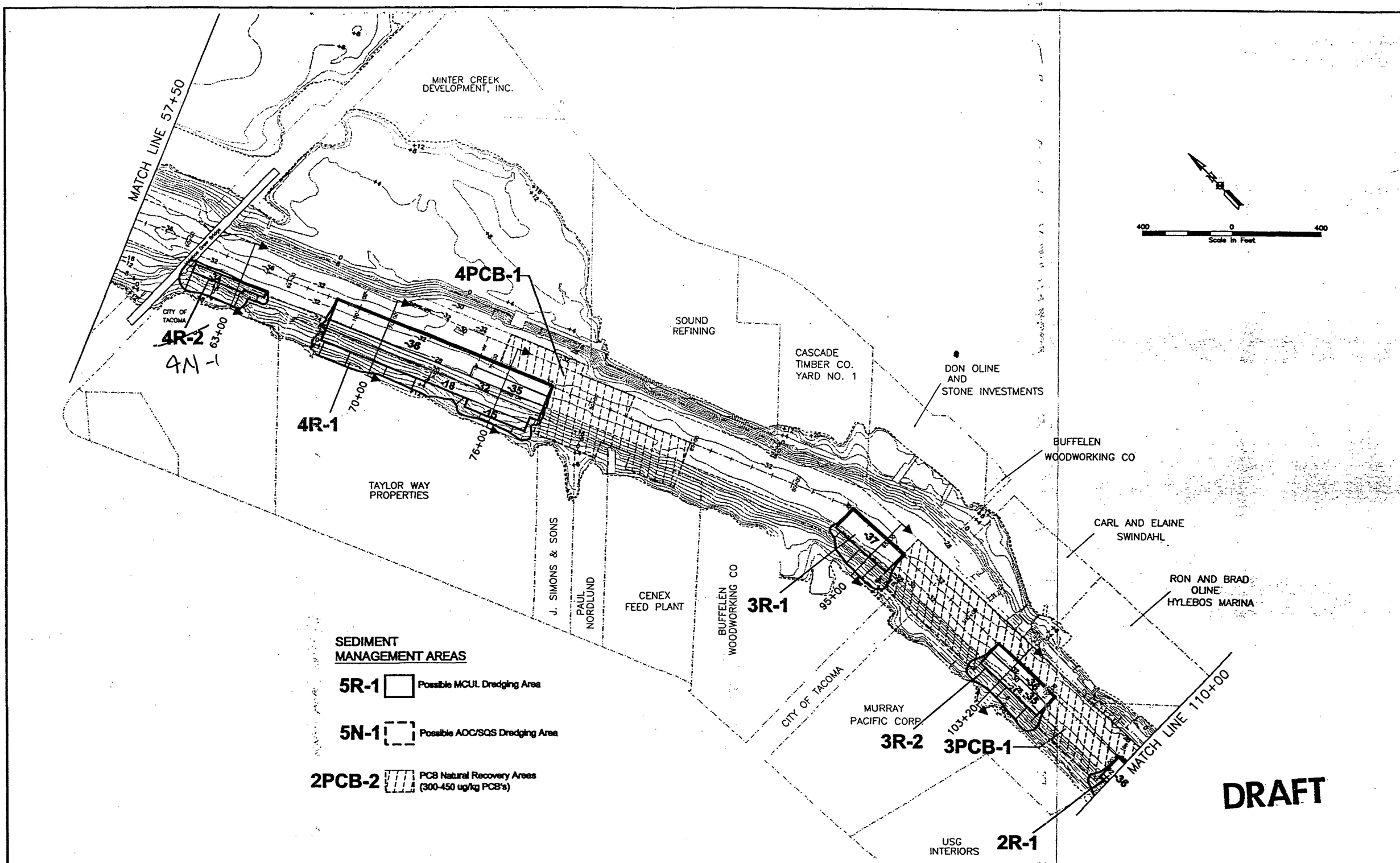
PRIVILEGED AND CONFIDENTIAL: Work Product Prepared in Anticipation of Litigation



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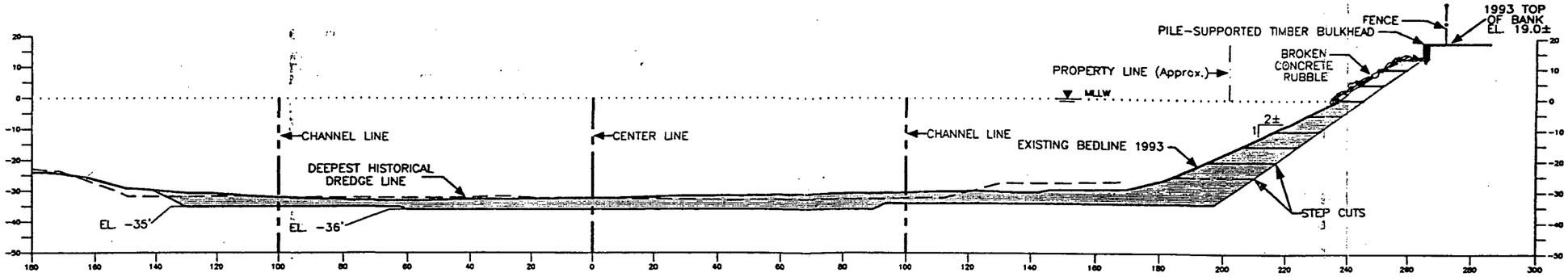
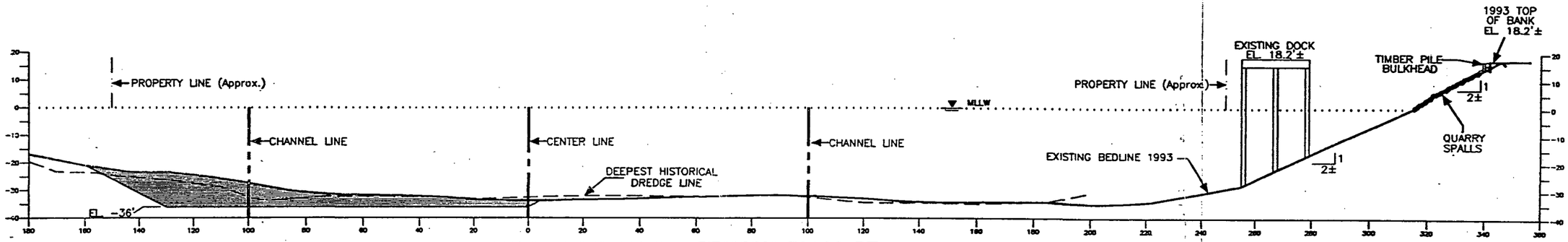
DRAWING: C-3 DATE 12/02/97

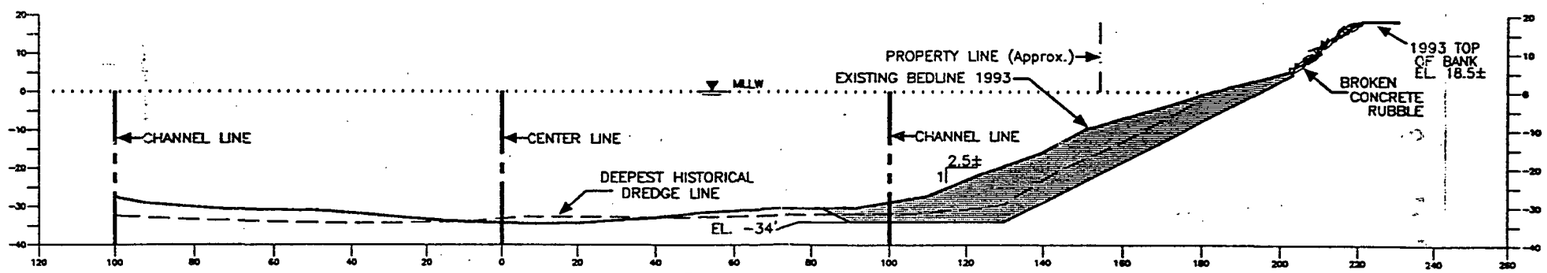
Figure C-3
Preliminary Dredge Plan at the Middle of Hylebos Waterway



MCUL AREA 5R-2 STATION 43+00 RT



MCUL AREA 5R-3 STATION 50+00 RT



~~MCUL~~ AREA ~~4R-2~~ STATION 63+00 RT

AOC/SQS 4N-1

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Scale 1"= 40' 1V=1H
Dredge Slope = 1V:2H

General Notes:
1. —— Indicates assumed 1993 existing bedline under docks and structures.
2. — — Indicates deepest historical dredge line and data extents.
3. ▒ Indicates dredge area.

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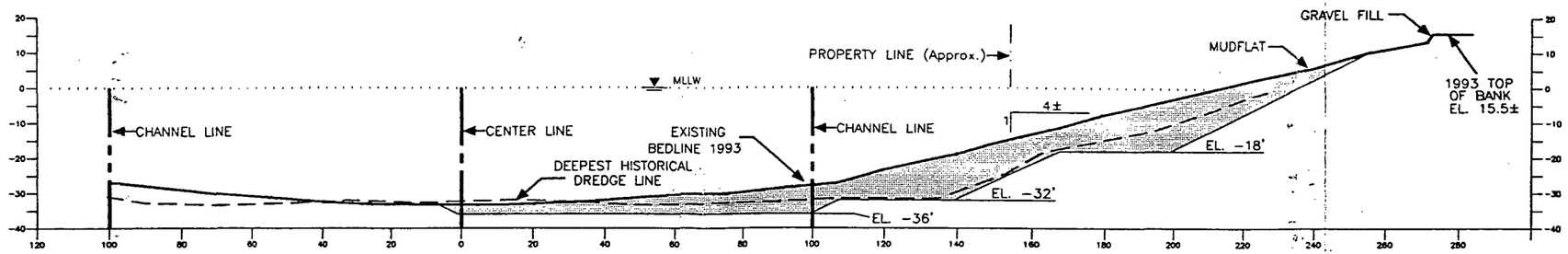
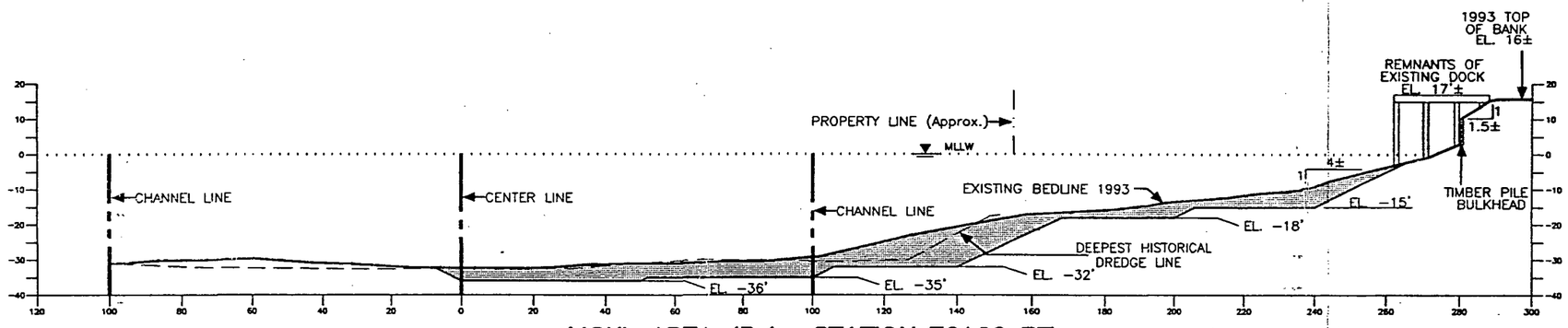
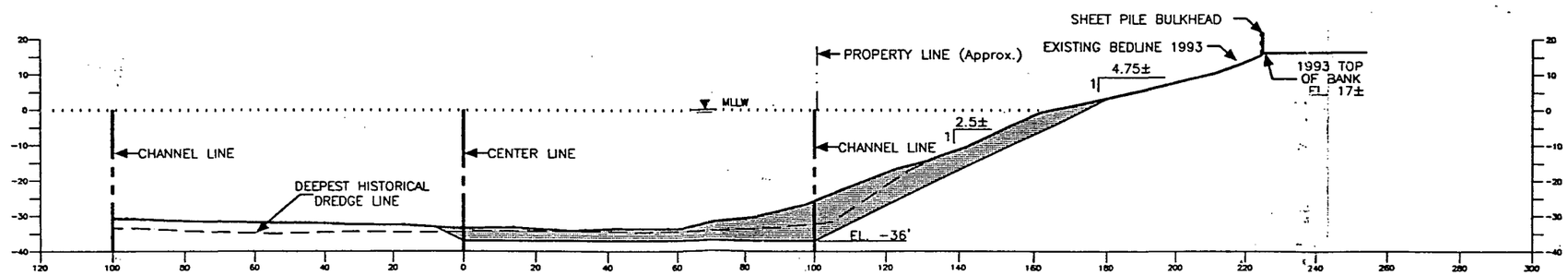
Figure C-8.
Preliminary Dredging Plan
Hylebos Waterway
Cross Sections



MCUL AREA 4R-1 STATION 70+00 RT



MCUL AREA 4R-1 STATION 76+00 RT



MCUL AREA 3R-1 STATION 95+00 RT

DRAFT

Scale 1"= 40' 1V=1H
Dredge Slope = 1V:2H

General Notes:
1. —— Indicates assumed 1993 existing bedline under docks and structures.
2. — — Indicates deepest historical dredge line and data extents.
3. ▒ Indicates dredge area.

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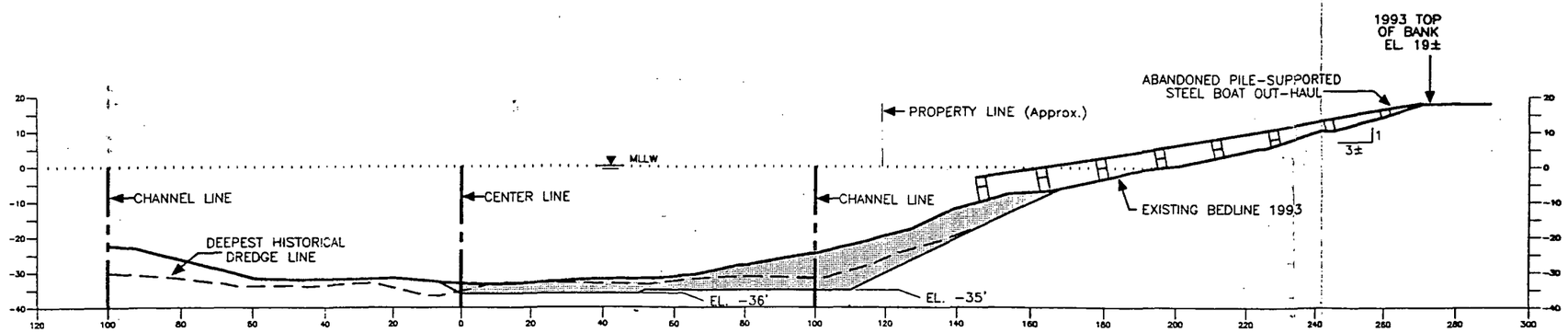
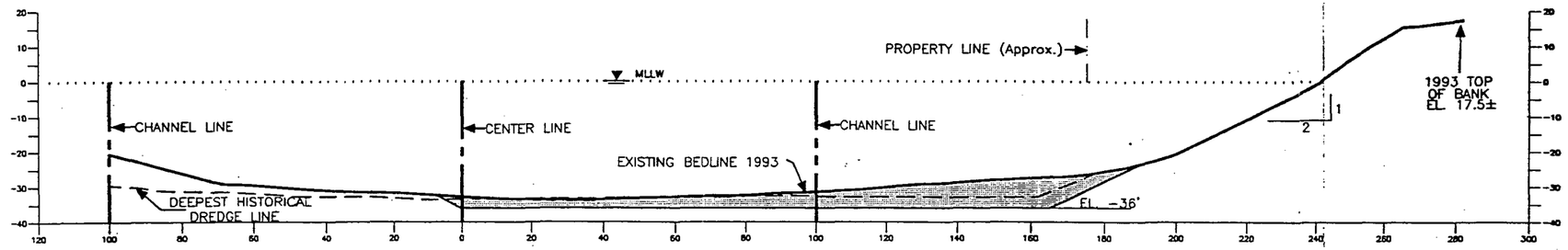
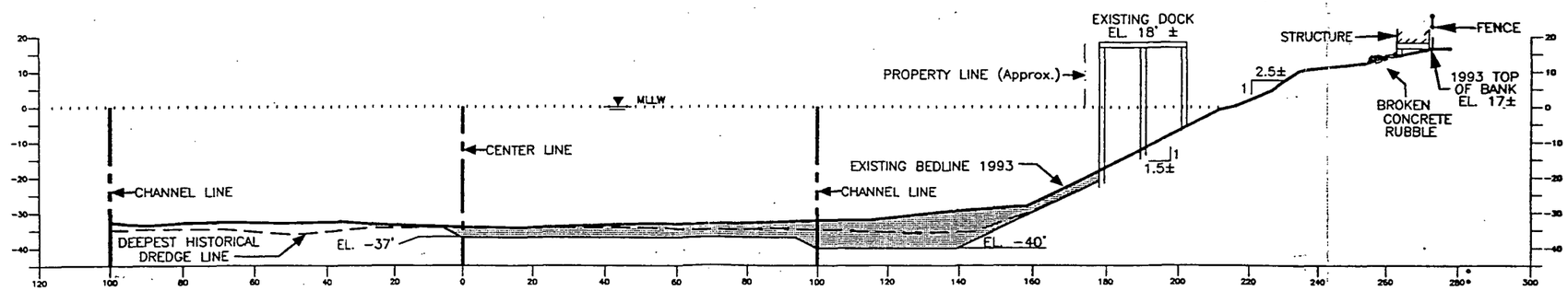
Figure C-7.
Preliminary Dredging Plan
Hylebos Waterway
Cross Sections



MCUL AREA 3R-2 STATION 103+20 RT



MCUL AREA 2R-1 STATION 113+00 RT



MCUL AREA 2R-1 STATION 121+00 RT

Scale 1"=40' 1V=1H
Dredge Slope = 1V:2H

General Notes:
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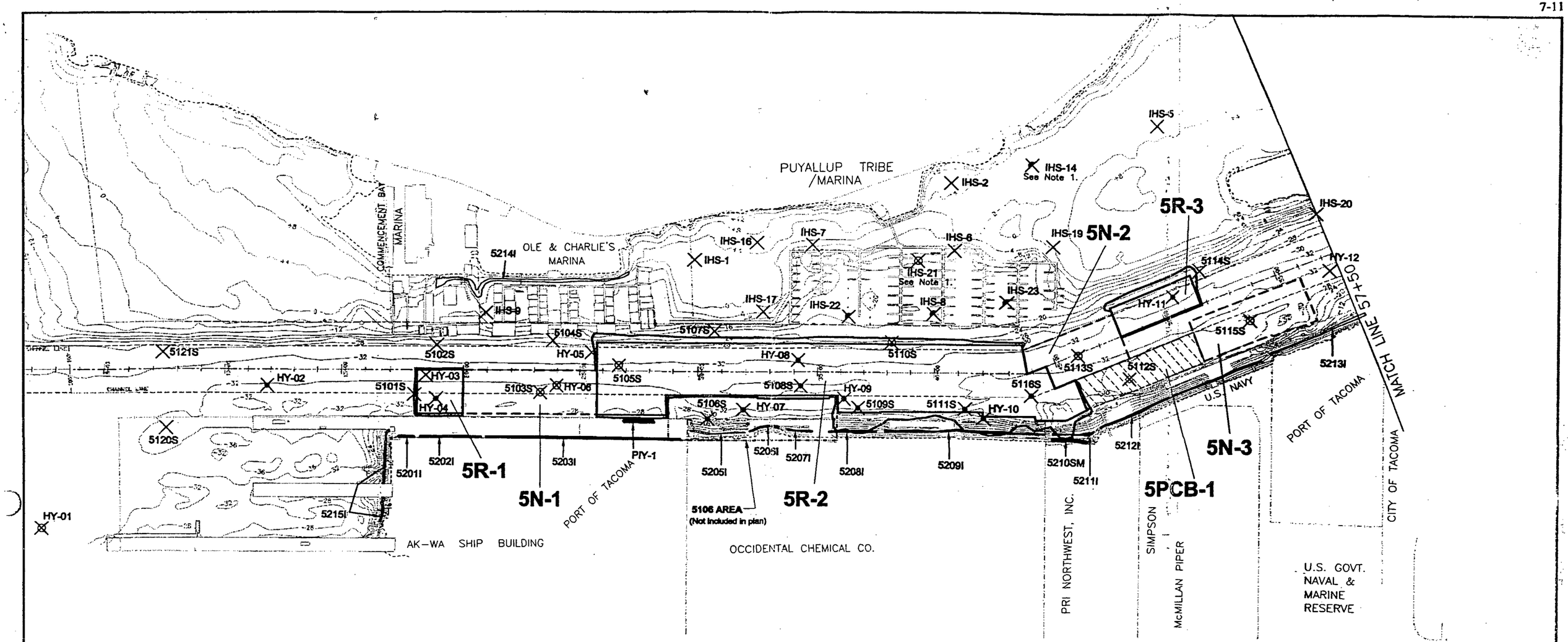
Figure C-8.
Preliminary Dredging Plan
Hylebos Waterway
Cross Sections



SEDIMENT MANAGEMENT AREAS

- **5R-1** — Possible MCUL Dredging Area
- **5N-1** — Possible AOC/SQS Dredging Area
- **2PCB-2** — PCB Natural Recovery Areas (300-450 ug/kg PCB's)

SAMPLING RESULTS

Intertidal Composites		Subtidal Stations	
	and		No criteria exceedances
	and		Chemistry SQO EF >1 and <2 with no biological data; or with an AOC/SQS biological exceedance; and PCBs <450 ppb
	and		No chemicals and/or no biological exceedances and PCBs >300ppb and <450 ppb
	and		Chemistry SQO EF>2 with no biological data; and PCBs <450 ppb
	and		Chemistry SQO EF>2 with no biological data; or with an MCUL biological exceedance; and/or PCBs >450 ppb

DRAFT

400 0 400
Scale in Feet

1. Stations IHS-14, IHS-15 & IHS-21 Will be allowed to recover naturally because active remediation would likely cause more ecological impact than natural recovery

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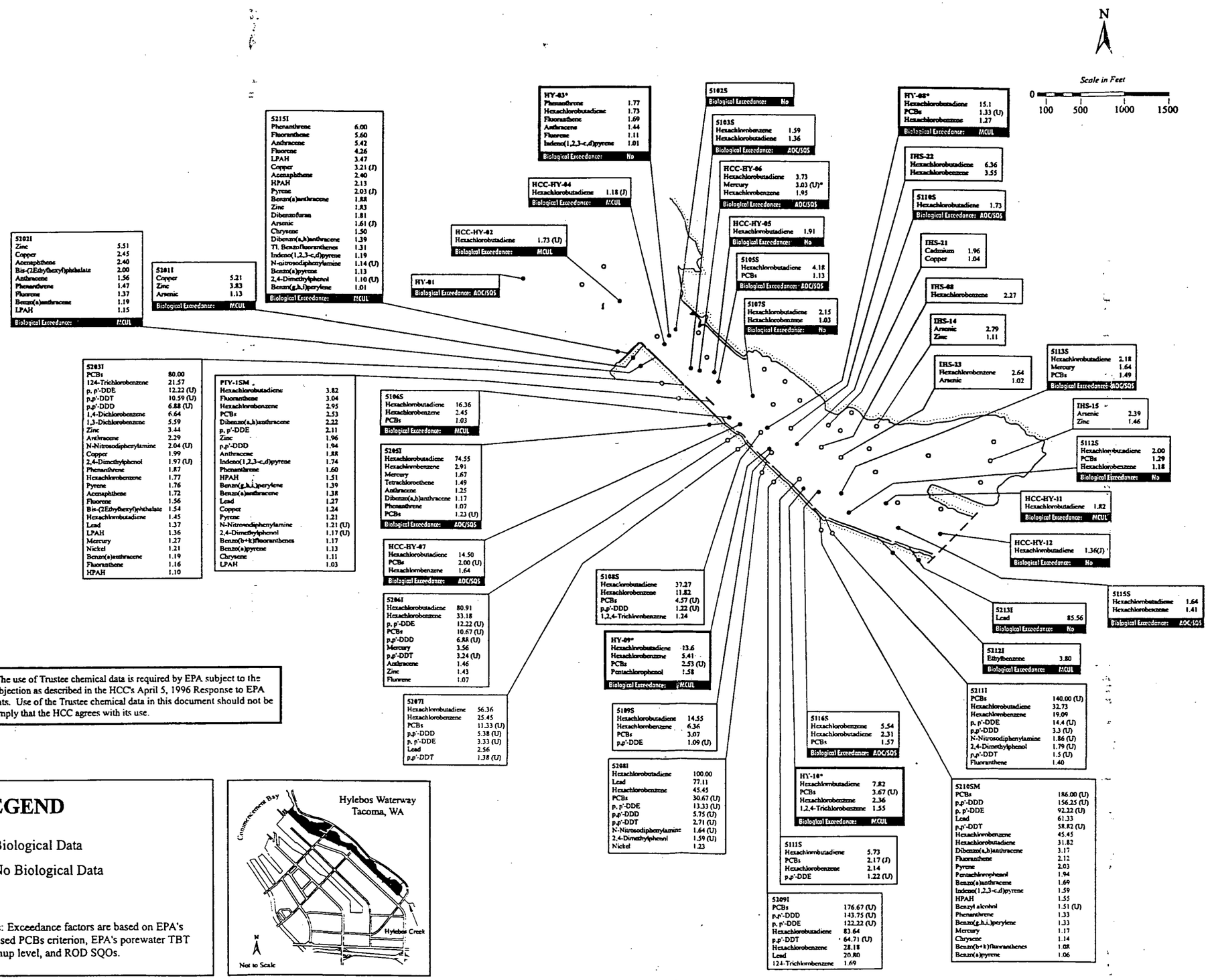
DRAWING: 7-5a1 DATE 12/02/97

Figure 7-5a
Possible Dredging & Natural Recovery Areas at the Mouth of Hylebos Waterway

Figure 5-14a

Exceedance Factors and Biological Results at the Mouth of Hylebos Waterway



DRAFT

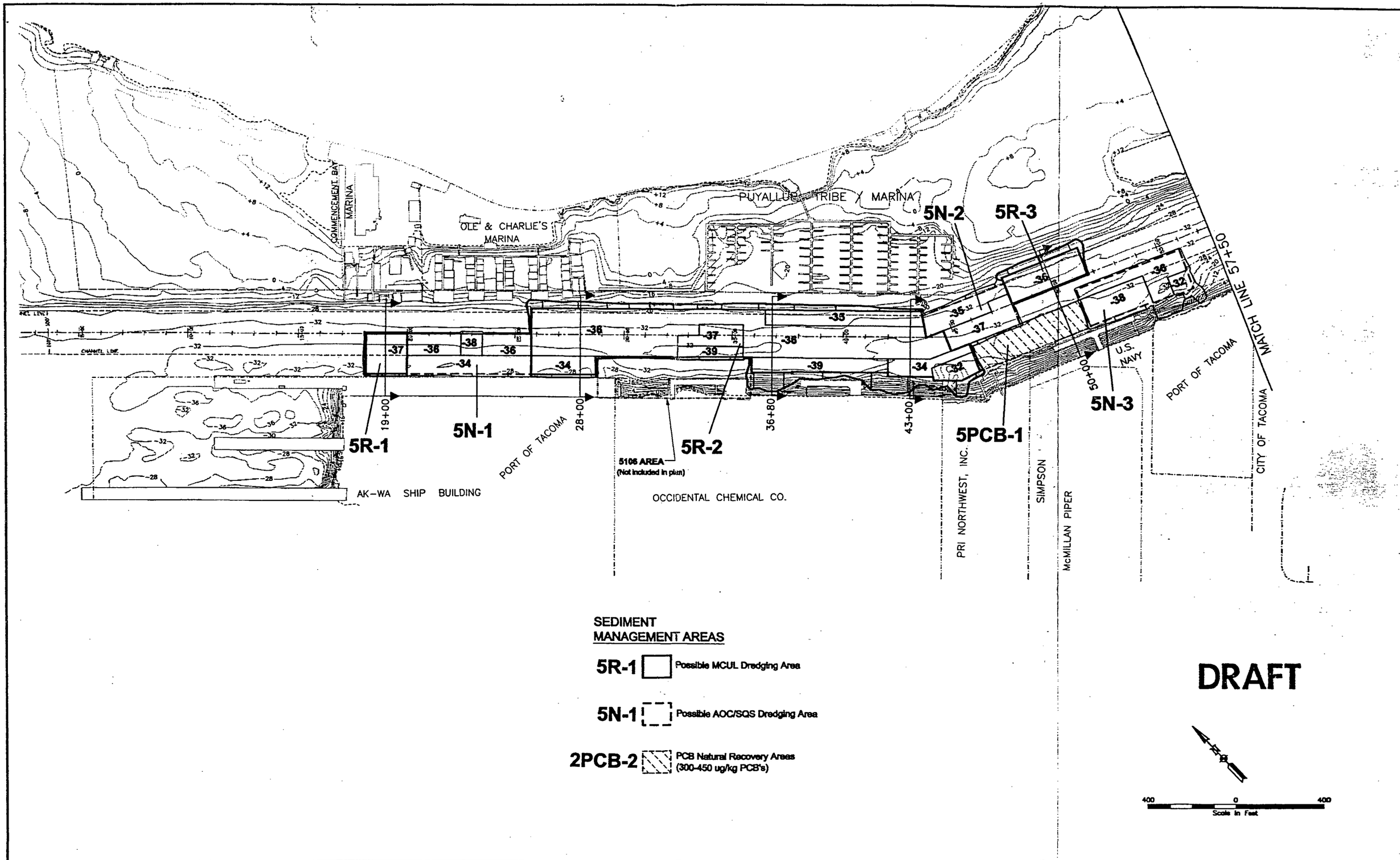


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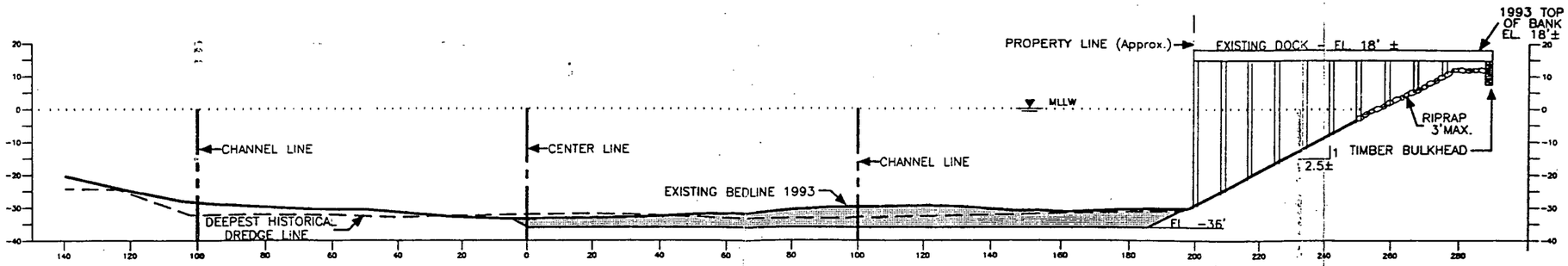
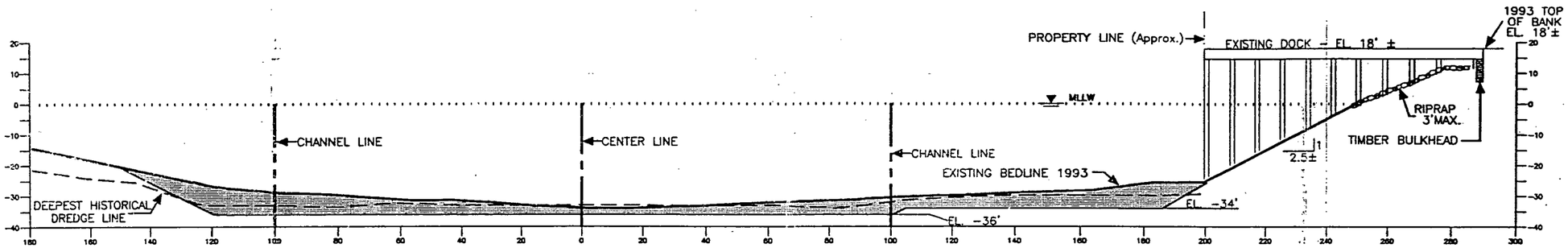
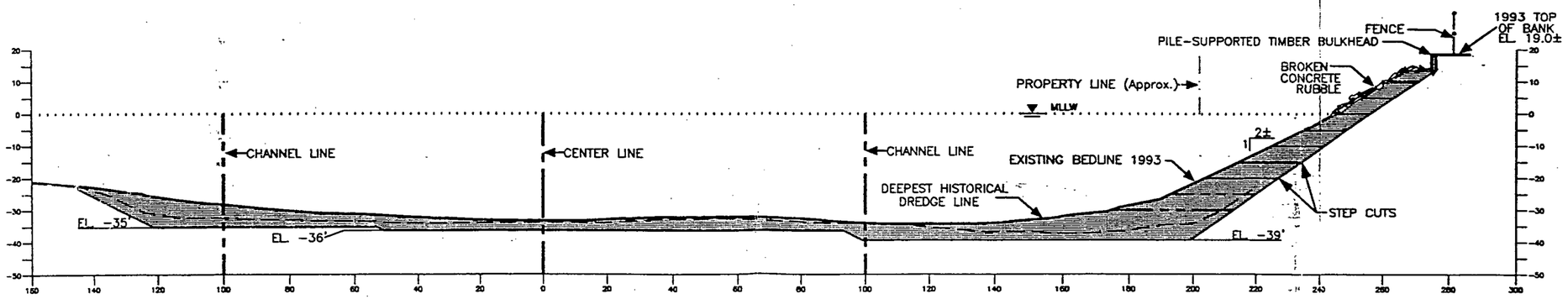
Figure C-2
Preliminary Dredge Plan at the Mouth of Hylebos Waterway



MCUL AREA 5R-1 STATION 19+00 RT



MCUL AREA 5R-2 STATION 28+00 RT



MCUL AREA 5R-2 STATION 36+80 RT

DRAFT

Scale 1"= 40' 1V=1H
Dredge Slope = 1V:2H

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3. ▒ Indicates dredge area.

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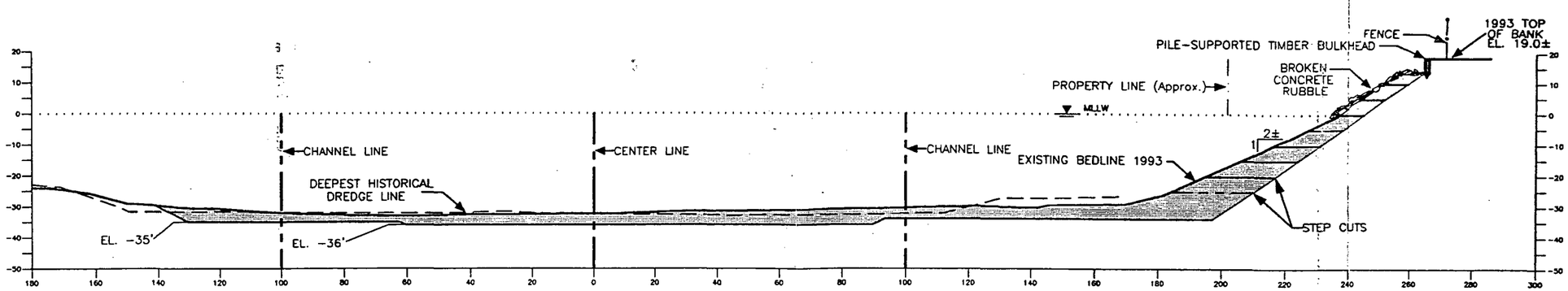
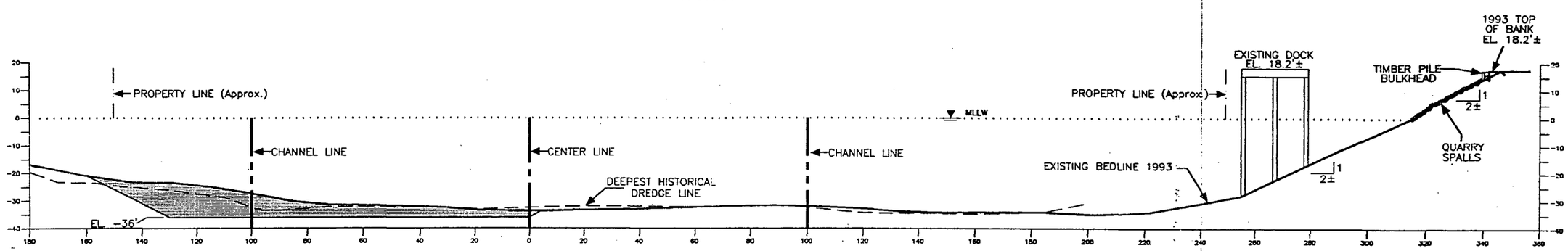
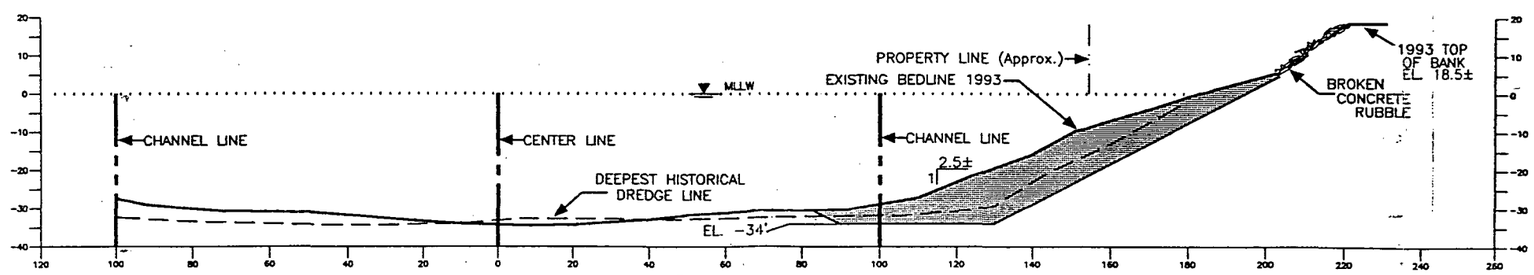
Figure C-5.
Preliminary Dredging Plan
Hylebos Waterway
Cross Sections



MCUL AREA 5R-2 STATION 43+00 RT



MCUL AREA 5R-3 STATION 50+00 RT



~~MCUL~~ AREA ~~4R-2~~ STATION 63+00 RT

AOC/SQS 4N-1

DRAFT

Scale 1"= 40' 1V=1H
Dredge Slope = 1V:2H

General Notes:
1. ——— Indicates assumed 1993 existing bedline under docks and structures.
2. — — Indicates deepest historical dredge line and data extents.
3. ▒ Indicates dredge area.

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Figure C-6.
Preliminary Dredging Plan
Hylebos Waterway
Cross Sections