1180 NW Maple St., Suite 310
Issaquah, WA 98027
T 425.395.0010
TRCcompanies.com

Letter of Transmittal

To: Ms. Piper Peterson, EPA Region 10

Date: May 10, 2022

Project No: 422756.0005

CC: Mr. Ken Lederman, McCullough Hill Leary, PS
Mr. Matt Gladney, Bridge Point Tacoma LLC

From: Mr. Thom Morin, LG, Vice President / Principal Geologist
Mr. Ramsey Mauldin, Senior Environmental Scientist

RE: Revised pages of the *Soil Management Plan for Property Redevelopment*
Bridge Point Tacoma LLC Redevelopment Project
South 56th Street and Burlington Way
Tacoma, Washington

We are submitting the following items:

Date	Number of Copies	Description
May 10, 2022	1	Pages from the *Soil Management Plan for Property Redevelopment* (SMP) revised by TRC on March 24, 2022.

☒ For your information ☐ For action specified below ☐ For review and comment
☐ For your use ☒ As requested

Remarks: The SMP was revised by TRC on March 24, 2022 to align with the final Stormwater Pollution Prevention Plan, as submitted with the Construction Stormwater General Permit and Notice of Intent Application Form for the Bridge Point Tacoma LLC redevelopment project. The pages included in this transmittal are those that were revised for this purpose.

Attachment A
Pages from Revised Erosion and Sediment Control
Section 3.3 of the SMP

Based on the recently decommissioned groundwater monitoring wells at the Site, groundwater, may be present at depths between approximately 7 and 25 feet below ground surface, and is not likely to be encountered during construction activities in the Project Area. The local groundwater gradient is generally flat and the depth to groundwater is most closely related to surface elevation. Accordingly, the depths to groundwater are deeper in the eastern higher elevation portions of the property than in the far western portions of the Project Area nearest the wetland. Placement and consolidation of contaminated soils will occur in the eastern portion of the Project Area.

3.1 Well Decommissioning

Prior to mobilizing equipment and materials, BNSF will have decommissioned groundwater monitoring wells that currently exist within the Project Area according to Ecology's "Minimum Standards for the Construction and Maintenance of Wells," WAC 173-360. A total of three wells will be decommissioned: VMW-2, VMW-3, and NMW-17A1. Wells that are currently used to monitor conditions around the former Amsted and Pioneer Builders properties are not within the Project Area and will remain intact.

3.2 Mobilization

The contractor will mobilize the necessary personnel and equipment and will establish the necessary work zones to manage the known contaminated areas with elevated lead. The creation of working hot zones, contaminant reduction (decontamination) zones and staging areas are discussed in greater detail in the HASP (Appendix A).

The contractor will mobilize to the Site prior to breaking ground and will set up the following features to support earthwork activities:

- Temporary mobile offices
- Communications, power, and water connections
- Materials and equipment staging area
- Erosion and sediment control features (silt fence, construction entrance, wheel wash)
- Portable restrooms
- Temporary lighting, as necessary
- Decontamination Zone (Warm Zone)

All construction-related setup will be conducted in advance of any clearing or grubbing operations to ensure proper containment methods will be sufficient in minimizing the potential for off-Site impacts during earthwork.

3.3 Erosion and Sediment Control

The redevelopment of the Project Area will be subject to a Construction General Permit that will include requirements for erosion and sediment control throughout the duration of the redevelopment. That plan will necessarily be compliant with all applicable regulations and subject to review and approval by the City of Tacoma and additional reviewing stakeholder.

There are not currently any stormwater catch basins within the Project Area. The Project Area and the completed redevelopment will include both stormwater discharge and on-Site infiltration. Discussions with the City of Tacoma indicate that stormwater runoff will not be allowed during the redevelopment actions. The Project Area and local soils are well drained and do not currently exhibit any discernable runoff or sheet flow.

During redevelopment, standard best management practices (BMPs) will be used as required by the Temporary Erosion and Stormwater Control (TESC) plan. The TESC is under development and will be submitted with appropriate permit applications to the City of Tacoma. The TESC can be provided to the EPA upon submission to the City of Tacoma. The BMPs will be upgraded and revised during the redevelopment action to assure that BMPs are maintained and effective.

Erosion and sediment control will include the management and mitigation of water and wind-blown sediment migration during and after construction.

In general, the entirety of the Project Area will be protected by placing silt fence around the perimeter of the areas to be disturbed. Straw wattle will be used to temporarily stabilize the areas that were disturbed during the installation of the silt fence to minimize sediment migration.

Erosion and sediment control measures will be upgraded as necessary to prevent the mobilization of soils during redevelopment activities. If the current BMPs being conducted are insufficient at preventing the mobilization of soils, additional BMP measures will be conducted to rectify the problem. Water spraying for dust suppression will be an ongoing component of this work as seasonally required. Maintaining adequate erosion and sediment control features will be a fundamental condition of this work.

Infiltration basins used to manage and infiltrate construction stormwater during the handling and placement of contaminated soils will generate sediments. Those sediments will need to be cleaned out at the completion of that phase of work. The sediments that exceed MTCA Method A cleanup levels (CULs) will be placed with the contaminated soils that are consolidated beneath Building B.

Pre-settlement basins will be used to settle and collect sediments prior to on-property infiltration. Once pre-settlement basins exceed 1 foot of sediment on the bottom or sides, the sediments will be sampled to determine appropriate disposal options. One composite sediment sample will be collected for every 10 cubic yards of sediment generated and will be analyzed for total lead and arsenic. Sediments that exceed the residential MTCA Method A Soil CUL for arsenic or lead will be decanted free of water and mixed and consolidated into the waste soils placed beneath Building B.

In addition, the infiltrated water will accumulate some sediment on the ground surface from the unsettled suspended solids in the pre-settlement basins. At the completion of the infiltration activities, these sediments will be addressed using the following procedures:

- Remove obvious fine sediment (anticipated to be generally less than 1 foot thick) down to the depth of original native soils);

- Collect soil samples at a frequency of 1 per 2,000 square feet and analyze for arsenic and lead;
- Remove any soils with concentrations exceeding MTCA Method A Soil CUL; and
- Collect and analyze confirmation soil samples to document compliance.

Sediments that exceed the MTCA Method A Soil CUL for arsenic or lead will be mixed and consolidated into the wastes placed beneath Building B.

At the completion of all handling of contaminated soils, the TESC and BMPs will be maintained as required by the permit and City of Tacoma but will no longer need to consider the potential impacts associated with contaminant soil runoff and sedimentation.

3.4 Earthwork

Figure 2 presents the project layout. Building A and associated adjacent parking will be located in the northern area of the Site where the 93,000 tons of previously consolidated contaminated soil is located. The grade for Building A has been adjusted to minimize the potential for contaminated material to be encountered during construction. Only an area on the east side of Building A will encounter the underlying contaminated material. This area is necessarily at a depth below the building finished floor to allow for construction of a truck loading dock. The contaminated material excavated for that loading dock will be placed beneath the southern portion of Building A. The remainder of the consolidated soil will be undisturbed and will ultimately be beneath the Building A or the adjacent paved tractor and trailer parking.

All other contaminated soil outside of the wetland buffer in the Project Area will be placed beneath Building B in a single consolidation cell. Portions of the Site outside of the Project Area will not be addressed as part of this SMP.

Appropriate public and private underground utility detection services will be performed at least 72 hours prior to breaking ground to mark and locate existing utilities. In addition, contractors will secure sources of water at various locations along the alignment for use in dust suppression and/or equipment decontamination activities. TRC personnel will monitor attendance of Site personnel as they enter and exit the Site, as necessary.

Earthwork and other related activities are discussed in detail in the following sections.

There are currently no above-ground existing structures within the Project Area. All waste materials that are generated during surface grading including asphalt, concrete, metal, rubber, cloth, plastic, or other materials that are not structurally suitable for re-use will be segregated and placed on plastic sheeting awaiting transportation off-Site for recycling and re-use, or for disposal, as appropriate. These materials are not considered contaminated.

The general strategy for earthwork during redevelopment is to minimize the disturbance of soils to the extent practical and to manage the soils on-Site to limit the potential for off-Site disposal.

Attachment B
Pages from Revised Infiltration Basin Construction
Section 3.10 of the SMP

- VOCs using EPA Method 8260C
- SVOCs and PAHs using EPA Method 8270
- PCBs using EPA Method 8082A
- Priority Pollutant Metals (13) using appropriate SW-846 Methods

Depending on analytical results, Bridge will consult EPA regarding the identified material and arrange for the disposal of the material(s) in an EPA-authorized designated location. Contaminated soil will be profiled for disposal according to applicable regulations and will carry any appropriate State or Federal Waste Codes. The following information will accompany any off-Site disposal of waste:

- Waste type
- Designated disposal facility name and location
- Waste profile number
- Bill-of-lading/Uniform Hazardous Waste Manifest number
- Date shipped
- Net shipping weight

All Bill of Lading/Uniform Hazardous Waste Manifest documents will require an owner representative to sign as the Generator. The driver will sign the shipping papers and a copy will be retained by TRC. These shipping papers will accompany the driver during transport to the disposal facility. Signed copies of all bill-of-lading/Uniform Hazardous Waste Manifest documents will be returned to the Site representative.

All off-Site waste disposal will be in accordance with applicable regulations.

3.9 Visual Indicator Installation

A visual indicator layer will be installed over the top of the relocated contaminated material beneath Buildings A and B prior to placing the final earthen cover. This indicator layer will be a visual indicator to future on-Site workers that the material below the indicator is contaminated and that certain health and safety precautions should be taken.

The visual indicator layer will consist of Marafi 150N or other similar geotextile.

3.10 Infiltration Basin Construction

All stormwater will be infiltrated from the completed development. This requires the construction of on-Site below-grade stormwater infiltration basins. The infiltration basins are located on the east and west sides of Building B in the location indicated on Figure 2, and as presented on the cross-sections (Figures 5 and 6). The completed project will also include a storm detention pond (Figure 3) to serve as a flow control facility for the southern portions of the Project Area.

The infiltration basins will receive the majority of the stormwater runoff from the on-property catch basins, and a portion of the stormwater collected on the southern end of the Project Area will be directed to a detention pond. The depth and horizontal separation of the infiltration basins from the consolidation cell beneath Building B will prevent contact between infiltrating precipitation and the consolidated soils. As indicated above, the sidewalls of the consolidation cell are on a 1.5 to 1 vertical to horizontal slope and are laterally separated from the infiltration basin by approximately 100 feet.

The infiltration basins will be constructed of a free draining gravel such as pea gravel. The soil removed to construct the infiltration basins will be used as clean fill in other portions of the Project Area.

3.11 Import Soils

It is currently anticipated that the cut and fill for the Project Area will balance with no need for either import or export soils. However, if import soils are required, those soils will be tested at the source prior to being transported to the Project Area. Before accepting any soils for import, they will be tested for the following:

- TPH (by Methods WA-HCID and follow-up for NWTPH-Dx); no visual or olfactory evidence of staining or odors and concentrations less than 2,000 mg/kg
- Priority pollutant metals (by EPA Methods 6010, 6020 and 7471)
- Total PCBs (by EPA Method 8082), and
- SVOCs and PAHs (by EPA Method 8270).

No import material found to exceed the current residential cleanup standards established under MTCA for the analyte list above will be placed within the Project Area.

3.12 Groundwater

Groundwater is not a medium of concern based on current data and it is unlikely that groundwater will be encountered during construction. Current groundwater elevation data suggest that groundwater is considerably deeper than the proposed maximum depth of excavation, and therefore will not be encountered. One exception may be during the trenching and installation of the main sewer service line.

The current groundwater conditions were highlighted in the November 6, 2019, letter titled Corrected Groundwater Attainment Analysis and Modification to Sampling Requirements, prepared by the EPA and submitted to the property owners for the Amsted Industries property. This letter reflects the attainment of the groundwater quality standards, and further affirms that the groundwater beneath the Project Area is not a medium of concern. Any groundwater that is recovered during sewer pipe installation will be outside of areas of contaminated soils.

Dewatering water would be pumped from the excavation, settleable solids would be removed, and the water would be infiltrated on-Site.

3.13 Unforeseen Impacts

However unlikely, there remains the potential for unforeseen or unexpected conditions to be encountered during mass excavation. Any apparent impacts will be communicated by on-Site personnel to TRC's on-Site staff. The area of interest will be assessed and if appropriate sampled and characterized as discussed above in Section 3.8.

If remnant underground storage tanks (USTs) are encountered during excavation they will be addressed in accordance with local regulations and Ecology's *Guidance for Site Checks and Site Assessments for Underground Storage Tanks*. USTs must be assessed by a Washington Licensed UST Assessor and decommission by a Washington Licensed UST Decommissioner. If a UST is encountered, it will be addressed in accordance with the requirements of MTCA and applicable and appropriate Ecology guidance. Any USTs encountered will be reported to EPA as a substantive change.

Any unforeseen impacts or unexpected conditions on-Site will be reported to EPA as soon as reasonably possible and within 48 hours. If the identified material or conditions requires a substantive change to this SMP, such potential changes will be discussed with EPA and an addendum to the SMP may be prepared for EPA review and consideration.

3.14 Utility Work

Following completion of the re-location of contaminated soils to areas below Buildings A and B, utility installation work may be performed by non-HAZWOPER trained workers. A minimum 2-foot-thick engineered soil cover will be covering the contaminated soils preventing direct contact by Site workers during utility work. A proposed 24-inch-diameter sewer line will be installed in a west to east orientation between Buildings A and B as presented on Figure 2. This sewer line will be installed well above the relocated contaminated soils and will not require specialized handling or PPE, unless air monitoring data require it. Utilities will not be placed in the re-located treated or contaminated and consolidated soils.

Utilities servicing the proposed buildings will be routed through backfilled soils as appropriate, as long as there remains 2-feet of vertical separation from contaminated soils.

If modifications to the building design or utility plans necessitate work within contaminated soils, such actions will follow the general principles outlined in this SMP and will incorporate appropriate health and safety protocols necessary to protect workers and the public.

4.0 HEALTH AND SAFETY

The Project Area is considered a hazardous waste site and until work to consolidate and cover contaminated soils is complete, workers likely to encounter contaminated soil are subject to