From: "Peterson, Piper" <Peterson.Piper@epa.gov>
To: "Morin, Thomas" <TMorin@trccompanies.com>
CC: "Yackulic, Ted" <yackulic.ted@epa.gov>
"Matt Gladney" <mgladney@bridgeindustrial.com>
"Ken Lederman" <ken@mhseattle.com>
"Morine, Adam" <AMorine@trccompanies.com>
"Mauldin, Ramsey" <RMauldin@trccompanies.com>
Date: 10/13/2022 3:49:57 PM
Subject: RE: [EXTERNAL] RE: Bridge - South Tacoma Field - Revised Soil Management Plan

Here is EPA's conditional approval of the SMP.

Piper Peterson
(She/Her/Hers)
US Environmental Protection Agency R10
Superfund Emergency Mgm't Division
1200 Sixth Avenue, Suite 155, M/S ***12-D12-1***
Seattle, Washington 98101-3188
(206) 553-4951
peterson.piper@epa.gov

Strength Finders-Winning Others Over (WOO), Communication, Strategic, Ideation, Positivity;
DiSC – Di; **Meyers-Briggs**: ESTJ

From: Peterson, Piper
Sent: Tuesday, September 21, 2021 5:35 PM
To: Morin, Thomas <TMorin@trccompanies.com>
Cc: Yackulic, Ted <yackulic.ted@epa.gov>; Matt Gladney <mgladney@bridgeindustrial.com>; Ken Lederman <ken@mhseattle.com>; Morine, Adam <AMorine@trccompanies.com>; Mauldin, Ramsey <RMauldin@trccompanies.com>
Subject: RE: [EXTERNAL] RE: Bridge - South Tacoma Field - Revised Soil Management Plan

Thomas,
EPA conditionally approves the Site Management Plan for Property Redevelopment which is an amendment of the Commencement Bay/South Tacoma Channel South Tacoma Field Operations and Maintenance Plan (BNSF 2000).

After making the following revisions, please submit the Final Plan to EPA and BNSF.

1. In response to one question in 1.0 Introduction, page 1 asking about the (BNSF 2000) reference. This is the date of the latest BNSF O&M Plan for this site. If there is a plan with a more recent date, then this should be cited and included in the Bibliography.
2. EPA's role is stated in sub-section 2.4 Roles and Responsibilities, page 12. EPA's role should state "EPA – the lead regulator for the Site who oversees response actions selected by the ROD and implemented pursuant to the Consent Decree and O&M Plans.

In addition, the name of the document can remain unchanged as it was previously determined that the O&M Plan should be amended for this work. After this work is completed, if (likely) there are additional and/or different O&M activities required for the redeveloped property in order to keep the covered soils sequestered in the future, another O&M amendment will be necessary. Even though the surface soils for this Site were partial deleted on June14, 2005, activities such as O&M and Five-Year Reviews are still required as there are soils above cleanup levels left on site.

Note: I mistakenly also sent this EPA conditional approval to the email on setting up a meeting with Ken L regarding a different matter. This is the formal, final approval for this document. Sorry for any confusion.

Sincerely,
Piper Peterson

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(She/Her/Hers)
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From: Morin, Thomas <TMorin@trccompanies.com>
Sent: Sunday, September 19, 2021 12:21 PM
To: Peterson, Piper <Peterson.Piper@epa.gov>
Cc: Yackulic, Ted <yackulic.ted@epa.gov>; Matt Gladney <mgladney@bridgeindustrial.com>; Ken Lederman <ken@mhseattle.com>; Morine, Adam <AMorine@trccompanies.com>; Mauldin, Ramsey <RMauldin@trccompanies.com>
Subject: RE: [EXTERNAL] RE: Bridge - South Tacoma Field - Revised Soil Management Plan

Piper and Ted,

On behalf of Bridge Point Tacoma LLC you ll find attached the current revised version of the Soil Management Plan.

This version incorporates each of your prior comments and suggestions, with minor edits.

For the purposes of transparency, also attached is a redline-strikeout version in .docx format so that you can more easily see the cumulative changes.

Regarding the title of the document (as referenced in your response below), our initial feedback on this document, and its purpose, was that it needed to be an amendment to the existing O&M Plan for the Site, to keep the administrative record clear that this is not a standalone action outside of the ROD and closure. We do reference Soil Management Plan as the title of the amendment. We hope that addresses your concern.

As an update on the project status, it is our understanding that the current schedule includes Bridge Point Tacoma LLC closing on its purchase of the property on or about September 27.

Please let us know if you have any additional questions or comments,

Thom

Thomas C. Morin, L.G.
Principal Geologist
PNW Area Practice Leader
Environmental Engineering, Construction, and Remediation

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From: Peterson, Piper <Peterson.Piper@epa.gov>
Sent: Tuesday, August 31, 2021 4:44 PM
To: Morin, Thomas <TMorin@trccompanies.com>
Cc: Yackulic, Ted <yackulic.ted@epa.gov>; Matt Gladney <mgladney@bridgeindustrial.com>; Ken Lederman <ken@mhseattle.com>; Morine, Adam <AMorine@trccompanies.com>; Mauldin, Ramsey <RMauldin@trccompanies.com>
Subject: [EXTERNAL] RE: Bridge - South Tacoma Field - Revised Soil Management Plan

This is an **EXTERNAL** email. Do not click links or open attachments unless you validate the sender and know the content is safe.

Mr. Morin,
Thank you for your revised Site Management Plan (revised August 26, 2021, prepared by TRC for Bridge Point Tacoma LLC) and incorporation of EPA's comments provided in July 2021. While the document revisions were mostly responsive, there are additional revisions required. Specific comments have been included in the attached document.

One matter to be considered is referring to this plan as an "Amendment to the Operations and Maintenance Plan, South Tacoma Field, Site Management Plan."
I believe that this is a stand-alone document, which references the ROD, CD and O&M Report to ensure that the selected remedy and remedial action is not compromised. When the redevelopment work is completed, and the final disposition of the contaminated site soils is known, then the O&M Plan can be amended to accurately portray the new configuration of the site soils.

This document does a good job describing the remaining contamination and how the contaminated soils will be safely addressed and protected during and after Site redevelopment. EPA does not have any concerns about this project moving forward and it believes that the work can be done safely and remain protective of human health and the environment and that the soils and groundwater will be as or more protected after the Project Area is redeveloped.

I took the opportunity to revise the text within the document. Attached are my redline/strikeout and margin comments on the revised Site Management Plan for Bridge's redevelopment activities. There appear to be a number of comments, but I don't believe that they significantly change the project. Rather the revisions clarify the condition of the site before, during and after redevelopment and either identifies or references the Site cleanup objectives or selected remedy.

If Bridge would like to incorporate an element of the Selected Remedy (see ROD Section 9.1.2 Containment (Capping) of Contaminated Soil, the second paragraph states:

Excavation of soil is not required beyond a depth of one foot. If, after excavation of one foot of soil, an area is still contaminated above the soil cleanup levels in Table 9-2, (based on sampling conducted by the PRPs), the PRPs shall cap this area. At their discretion, the PRPs could choose to continue excavating below a depth of one foot until contaminants in soil are below cleanup levels or until the MTCA fifteen foot point of compliance is met. If cleanup levels are achieved, capping would not be required in that location.

If Bridge were to conduct additional soil sampling in areas that contaminated soils have been scraped and consolidated under Buildings A or B, it may indicate that the remaining soils are below the MTCA residential cleanup levels and therefore, any asphalt or concrete cover in these areas is not necessary to "protect" soils and/or groundwater. As such, those areas that meet this standard would not have to be identified in an Environmental Covenant or an amended O&M Report requiring regular monitoring and repairs if necessary. While this sampling is not required for the redevelopment project to proceed, nor is it required by EPA, I wanted to bring it to your attention.

In addition, I reviewed the revised Health and Safety Plan (Appendix A). EPA does not approve HASP documents; it only provides comments. It appears that the additional details and clarifications suggested in EPA's comment letter have been incorporated into the plan. Figure 1 appears to be "generic" in nature, and it was not clear that the Hot and Warm Zones are in the area of the treated and consolidated materials that will be excavated for construction of Building A and its loading zone. I would suggest updating this figure after the project design is further along to ensure that these protective zones are accurately identified.

I am available to discuss EPA's comments further if you would like.

Sincerely,
Piper Peterson
EPA Project Manager

Piper Peterson
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From: Morin, Thomas <TMorin@trccompanies.com>
Sent: Friday, August 27, 2021 1:03 PM
To: Peterson, Piper <Peterson.Piper@epa.gov>
Cc: Yackulic, Ted <yackulic.ted@epa.gov>; Matt Gladney <mgladney@bridgeindustrial.com>; Ken Lederman <ken@mhseattle.com>; Morine, Adam <AMorine@trccompanies.com>; Mauldin, Ramsey <RMauldin@trccompanies.com>
Subject: Bridge - South Tacoma Field - Revised Soil Management Plan

Piper,

On behalf of Bridge Point Tacoma, attached you ll find the Revised SMP/HASP as a ¤clean PDF and .docx versions showing the revisions that were made in response to EPA s comments.

Please let us know if you have any additional comments or questions.

Thom

Thomas C. Morin, L.G.
Principal Geologist
PNW Area Practice Leader
Environmental Engineering, Construction, and Remediation

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