



## **TERMINAL 108 – SOURCE CONTROL STRATEGY WORK PLAN**

**FINAL**

**For submittal to:**

**Washington State Department of Ecology**  
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Bellevue, WA 98008

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## Acronyms

<b>BMP</b>	best management practices
<b>Boeing</b>	The Boeing Company
<b>CAP</b>	Cleanup Action Plan
<b>City</b>	City of Seattle
<b>County</b>	King County
<b>CSM</b>	conceptual site model
<b>CSO</b>	combined sewer overflow
<b>EAA</b>	early action area
<b>Ecology</b>	Washington State Department of Ecology
<b>EOF</b>	emergency overflow
<b>EPA</b>	US Environmental Protection Agency
<b>LDW</b>	Lower Duwamish Waterway
<b>LDWG</b>	Lower Duwamish Waterway Group
<b>MTCA</b>	Model Toxics Control Act
<b>NPDES</b>	National Pollutant Discharge Elimination System
<b>PAH</b>	polycyclic aromatic hydrocarbon
<b>PCB</b>	polychlorinated biphenyl
<b>Port</b>	Port of Seattle
<b>RI/FS</b>	remedial investigation/feasibility study
<b>RM</b>	river mile
<b>ROD</b>	Record of Decision
<b>ROW</b>	right-of-way
<b>SCAP</b>	source control action plan
<b>SCSP</b>	source control strategy plan
<b>SMS</b>	Washington State Sediment Management Standards
<b>SD</b>	storm drain
<b>T-108</b>	Terminal 108
<b>USACE</b>	US Army Corps of Engineers
<b>WAC</b>	Washington Administrative Code
<b>Windward</b>	Windward Environmental LLC
<b>WWTP</b>	wastewater treatment plant

## 1.0 Introduction

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The Lower Duwamish Waterway (LDW) is an approximately 5.5-mile waterway located in Seattle, Washington. In 2001, the US Environmental Protection Agency (EPA) added the heavily used industrial waterway to the nation's Superfund list. Contaminants identified in the waterway's sediments that led to its listing include polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), various metals, and phthalates. These identified contaminants may threaten both humans and wildlife.

In December 2000, EPA and the Washington State Department of Ecology (Ecology) entered into an Agreed Order on Consent with King County (County), the Port of Seattle (Port), the City of Seattle (City), and The Boeing Company (Boeing). The purpose of the order was for the completion of a remedial investigation and feasibility study (RI/FS) to address the waterway's sediment contamination. Subsequent to signing of the agreement, the County, the City, the Port, and Boeing formed the Lower Duwamish Waterway Group (LDWG) to manage and coordinate the ongoing investigation and remediation strategy efforts.

Preventing recontamination to levels that exceed the Washington State Sediment Management Standards (SMS) (per Washington Administrative Code [WAC] 173-204) and the LDW sediment cleanup goals is the ultimate focus of Ecology's source control strategy. The LDW source control program, under Ecology's lead, is designed to identify and manage sources of contamination to LDW sediments in coordination with sediment remediation activities. This strategy provides the framework for identifying source control issues and implementing effective controls, potentially including various levels of remedial action.

As indicated in Ecology's LDW source control program documentation, the Port is supporting the goals of the source control strategy by implementing source control programs at Port-owned properties, including those either operated by the Port or leased to various tenants. A summary of the Port's and their tenant's responsibilities outlined in the source control strategy document include:

- Source control management for Port properties that collect and discharge stormwater directly to the LDW
- Support of source control efforts conducted by the City or County for Port properties that discharge stormwater to the municipal systems
- Inspection and assessment of Port-owned properties (as per applicable regulations, established permit requirements, etc.) that may influence sediment quality as a result of impacts from stormwater discharges, eroding banks with contaminated soils, groundwater contamination, etc.

- Implementation of necessary corrective actions to meet regulatory requirements when issues are found (Ecology 2004c)

A primary goal of Ecology's LDW source control strategy is to identify and control sources early, starting with identifying potential historical and ongoing sources of contamination to the waterway. Ultimately, EPA's Record of Decision (ROD) and Ecology's Cleanup Action Plan (CAP) for the LDW will require sources that contribute to sediment contamination be evaluated, investigated, and controlled to the greatest extent practicable. To support the LDW source control strategy, Ecology is preparing area-specific source control action plans and data gaps analysis reports to establish current environmental conditions and evaluate historical and ongoing sources of contamination (Ecology 2004b).

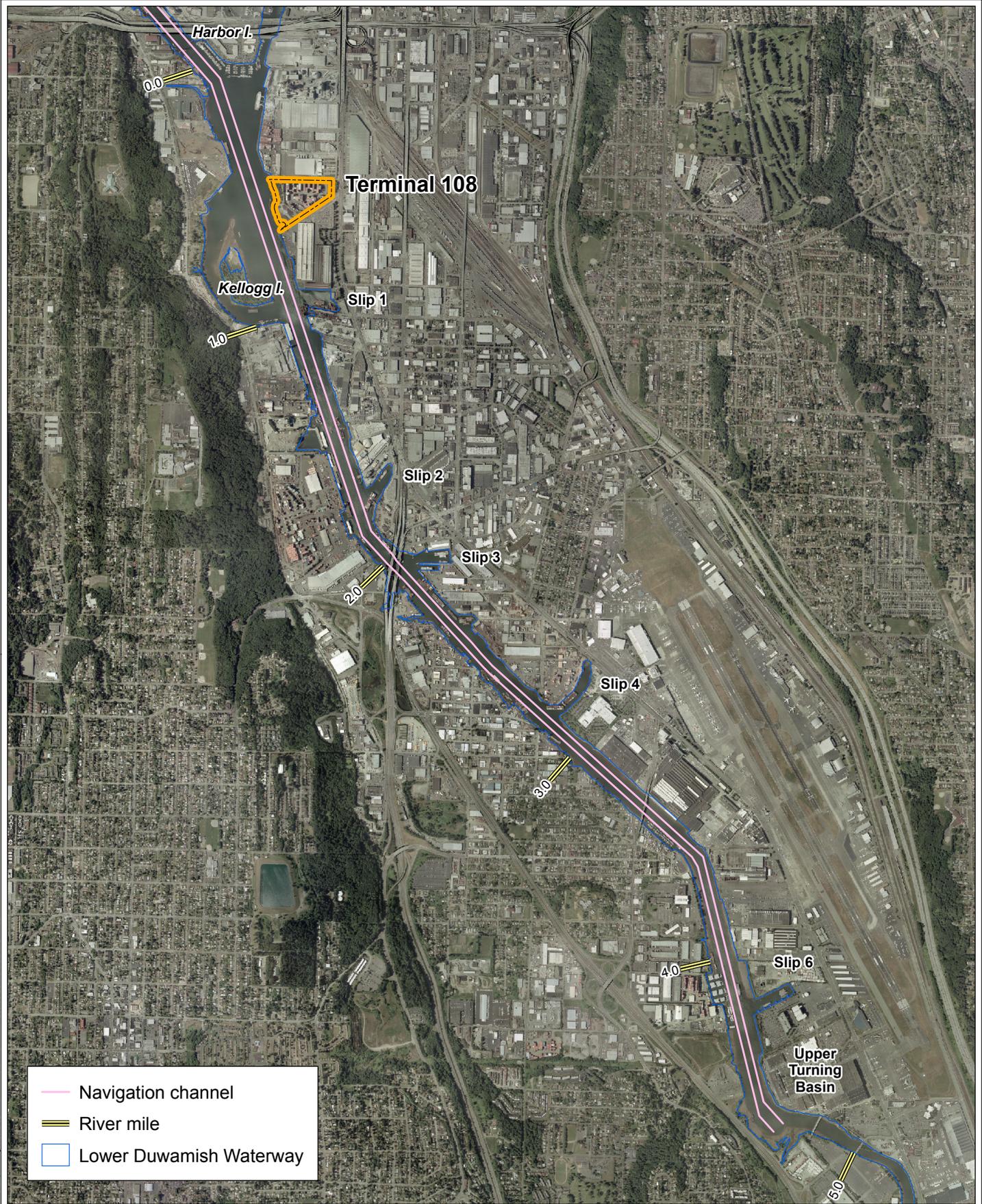
In line with this support, the Port has been tasked by Ecology to independently develop a source control strategy plan (SCSP) for its Terminal 108 (T-108) property. The plan and the strategy it derives will be managed and implemented on an independent basis by the Port at this time in lieu of a formal order from Ecology. This work plan outlines the program to be implemented at T-108, with Ecology's concurrence, and the associated deliverables and reporting information to be generated as part of the area-specific strategy. Work to be performed at the site, including any potential remedial activities, will be managed as outlined under the Model Toxics Control Act (MTCA), the National Pollutant Discharge Elimination System (NPDES) requirements, and other established regulations.

## **1.1 SITE BACKGROUND**

The Port's T-108 property is located on the eastern shore of the LDW, just upstream of Harbor Island (Map 1). For the purposes of this work plan, T-108 will be referred to as the subject property. The subject property has been owned by or leased to various entities during its history of industrial and commercial use.

In 2003, seven candidate sediment sites for early action (subsequently referred to as early action areas [EAAs]) were identified in the LDW (Windward 2003). One of the recommended EAAs, EAA 1, includes the nearby Duwamish/Diagonal combined sewer overflow (CSO) and storm drain (SD) area on the east side of the LDW at the end of the Oregon Street right-of-way (ROW). The subject property borders these outfall locations to the south and directly abuts the early action sediment area.

In December 2004, Ecology published a Source Control Action Plan (SCAP) for the Duwamish/Diagonal Way Early Action Cleanup Area (EAA 1) which strategized the approach to ongoing evaluation and control of sources of contamination to the sediment area. In that strategy document, the subject property was included as a property of potential concern relative to identified sediment contamination associated with EAA 1 (Ecology 2004a).



- Navigation channel
- River mile
- Lower Duwamish Waterway



0 0.25 0.5  
Miles

0 0.5 1  
Kilometers

**Map 1. Terminal 108 location**

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As a result of this association, Ecology has requested that the Port provide documentation of subject property's environmental conditions and develop a long-term SCSP to be implemented and managed on an independent basis. This work plan outlines how existing environmental and facility information, including information on potential areas of historical or ongoing contamination, will be summarized and documented for the subject property.

This work plan also establishes the basis for the development, implementation, and management of the SCSPs for the subject property. The development of the SCSPs will take into consideration current operations and the recommendations that will be derived as part of the environmental conditions reporting effort (Task 1). The SCSPs will consider remedial action alternatives, if appropriate, based on the conclusions of the environmental conditions documentation and the approaches deemed to be most effective for the potential issues at the subject property.

## **1.2 WORK PLAN PURPOSE AND ORGANIZATION**

The purpose of this work plan is to provide the framework and process for the evaluation of existing environmental data, identification of potential source control issues, and implementation of effective controls (potentially including remedial actions), as necessary, for the subject property. This work plan will receive review and concurrence by Ecology prior to program implementation. As discussed with Ecology, the program to be implemented will be managed on an independent basis by the Port, through effective use of established regulatory procedures (MTCA, permit programs, etc.) and with ongoing technical consultation with Ecology. The Port acknowledges that Ecology reserves its rights to pursue cleanup in the future under a more formal framework.

The efforts and deliverables to be included as part of this program will be managed on a task-by-task basis. The components to be included under each task are discussed in this document. New tasks may be added as the program is implemented and the Port and/or Ecology determine that additional potential issues need to be addressed or actions need to be taken. A schedule for implementation and reporting is also provided.

This work plan is organized as follows:

- ◆ Section 2.0, Site Description and History
- ◆ Section 3.0, Environmental Conditions and Data Gaps Analysis Report (Task 1)
- ◆ Section 4.0, Source Control Strategy Plans (Tasks 2 and 3)
- ◆ Section 5.0, Program Implementation and Status Reporting Schedule (Task 4)
- ◆ Section 6.0, References

## **2.0 Site Description and History**

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This section briefly describes the general features of the subject property and key aspects of its operation and ownership history. A more comprehensive and detailed discussion of both topics will be provided in an environmental conditions and data gaps analysis report to be prepared as Task 3 of this program (see Section 3).

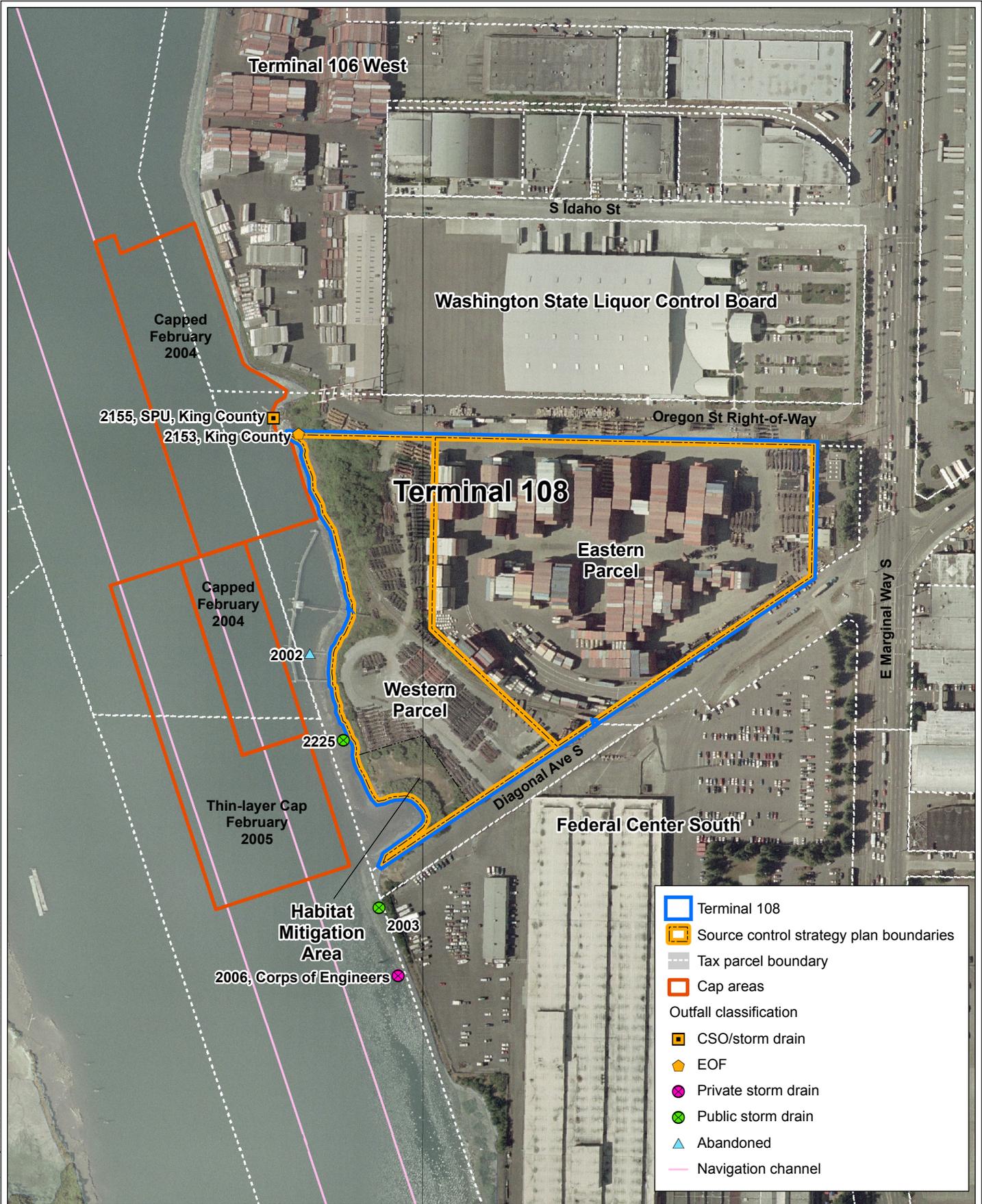
### **2.1 SITE DESCRIPTION**

The subject property is located on the eastern shore of the LDW approximately between River Mile (RM) 0.5 and RM 0.7, as measured from the southern tip of Harbor Island. The subject property consists of two adjacent land parcels: the Western Parcel (also referred to in documentation as the nearshore) and the Eastern Parcel (also referred to in documentation as the upland area). Both the eastern and western parcels are currently leased by the Port to ConGlobal Industries, Inc. (formerly Container Care International), for cargo container storage and truck chassis storage and repair (Map 2).

The subject property occupies approximately 21 acres (including upland property and a portion of the nearshore tidal area), bordered to the west by the LDW, to the north by the Oregon Street ROW and the southwest portion of Terminal 106, to the east by E Marginal Way S, and to the south by Diagonal Avenue S and the Federal Center South complex. The subject property includes approximately 700 feet of shoreline. A 1.2-acre public-access park and habitat mitigation area is located at the southwest corner of the property along the LDW. This park was created as part of a habitat mitigation project completed by the Port in the late 1980s.

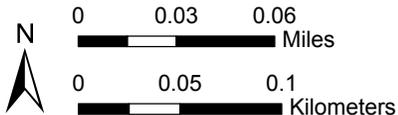
The topography at the subject property is generally flat, with the exception of the shoreline area, where the gradient slopes steeply into the LDW before becoming gently sloped again toward the center of the waterway. The Eastern Parcel includes both paved and unpaved areas; much of the unpaved area is covered with crushed gravel to support the overall design implemented in 1989 for the parcel's use as an off-dock container storage area. The Western Parcel is mostly unpaved and includes areas of vegetation along the shoreline. A dock was installed offshore in 1980s to facilitate the transport of materials by pipeline to and from the property for a dry-bulk cement tenant. The tenant removed the silos, their foundations, and associated piping when they vacated the property. The dock is currently not used. The shoreline is fortified with riprap armoring, cobbles, and boulders, with the exception of a section of shore between the habitat mitigation area and the unused dock. Most of the subject property is fenced and inaccessible; however, the southern shoreline area is accessible along the beach, depending on tide levels, from Diagonal Avenue S and through the habitat mitigation area.

Four outfalls discharge to the LDW through or adjacent to the subject property as shown on Map 2. These include the Diagonal Avenue S CSO/SD (2155), the Duwamish emergency overflow (EOF) (2153), the Diagonal Avenue S SD (2003),



	Terminal 108
	Source control strategy plan boundaries
	Tax parcel boundary
	Cap areas
Outfall classification	
	CSO/storm drain
	EOF
	Private storm drain
	Public storm drain
	Abandoned
	Navigation channel

**Map 2. Terminal 108 vicinity map and source control strategy plan areas**  
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and a Port SD outfall (2225). These outfalls convey stormwater into the LDW; the Diagonal Avenue S CSO/SD can potentially convey untreated sewer wastewater to the LDW during a CSO event. The formerly-used WWTP outfall (2002) is located along western parcel's shoreline. A stormwater collection system is currently in operation on the Eastern Parcel, and much of the runoff from this parcel enters the Diagonal Avenue S CSO/SD system at northern edge of the property. The Western Parcel does not currently have a stormwater conveyance system, with the exception of a Port-owned SD outfall that drains the southern portion of the parcel and discharges to the LDW at the northern edge of the habitat mitigation area.

## **2.2 SITE HISTORY**

The present-day T-108 property was formed when areas of tidal marsh were filled during the realignment and subsequent dredging of the Duwamish River. The first owner of the property was the City of Seattle, which constructed and operated the former Diagonal Avenue Waste Water Treatment Plant (WWTP) at this location from 1938 to 1969. The WWTP discharged primary-treated effluent through an open channel into the LDW through a discharge point located to the south of the existing Duwamish EOF. The location of the WWTP, based on available information and historical aerial photography, was between the Oregon Street ROW easement and Diagonal Avenue S, just west of E Marginal Way S. The WWTP treated wastewater from Seattle's industrial area and much of the residential area to the east of the LDW (King County 1997). As a component of its operations, sludge ponds and drying beds connected to the plant's clarifiers and digesters were located in the north-central portion of the subject property's eastern parcel (AGI 1992). At the time the plant was decommissioned, some volume of sludge was removed from these beds, but the majority of the sludge was left in place and later covered with fill.

The Chiyoda Corporation acquired the property in the early 1970s, including the area that was thought to be the site of the former WWTP. During their occupation of the property, the Chiyoda Corporation dredged the nearshore area of the waterway to improve berthing for its planned terminal; the volume of materials dredged during that event is unknown. The Chiyoda Corporation was planning to develop the property as a chemical off-loading, warehousing, and shipping facility but only completed the dredging for the berth before abandoning their development plans.

On September 13, 1974, an electrical transformer was accidentally dropped releasing an estimated 265 gallons of over 95% pure PCB-containing transformer oil (Aroclor 1242) into the LDW at Slip 1, which is located upstream of the subject property (AGI 1992). In response, an initial free product removal effort was completed in 1975 followed by a major PCB cleanup completed in 1976 by the US Army Corp of Engineers (USACE) with oversight managed by EPA. As part of this effort, PCB-laden sediment materials were hydraulically-dredged and piped to the Chiyoda property by USACE. Approximately 10 million gallons of contaminated sediment sludge were deposited in two WWTP sludge lagoons that had been re-excavated for the cleanup

effort. The water decanted from the sludge material was pumped out of the lagoons through filters and back into the LDW. The lagoons were eventually backfilled with soil from the original excavation footprints and with sediment materials dredged by Chiyoda for improved berthing conditions (AGI 1992).

The Port acquired the Chiyoda property in 1980 and later transferred ownership of the Eastern Parcel to Chevron, retaining the Western Parcel (adjacent to the waterway). The Eastern Parcel was repurchased by the Port in 1992. The Port leased a portion of the Western Parcel to the Lafarge Cement Company, which operated on the property from 1989 to 1998. In addition, ReNu Recycling, a construction material recycling company, operated on the property for a brief period of time. Currently, the only tenant on both the eastern and western parcels of the subject property is ConGlobal Industries.

### **3.0 Existing Environmental Conditions and Data Gaps Analysis Report (Task 1)**

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In support of ongoing source control evaluation and assessment efforts at the subject property, the Port will prepare an existing environmental conditions and data gaps analysis report (hereafter referred to as the Environmental Conditions Report) to summarize and document previous environmental and source investigations relevant to the subject property. The goal of this effort will be to clearly establish the present conditions of the subject property and provide a mechanism for evaluating perceived data gaps and identifying additional information requirements. As outlined previously in Section 1.2, this Environmental Conditions Report will be completed as Task 1 of the Port's comprehensive T-108 SCSP. This report will guide the content and development of the parcel-specific SCSPs to be prepared under Tasks 2 and 3.

At a minimum, the Environmental Conditions Report will include the following information:

- ◆ Introduction and purpose of report
- ◆ Brief description of specific subject property characteristics including ecological and physical features, stormwater system infrastructure, etc.
- ◆ Identification of property's ownership and operational history, including appropriate parcel designations and legal boundaries, and a discussion of ownership and operations at immediately adjacent properties. Operational history will be discussed relevant to potential contributions to historical and ongoing contamination at the subject property.
- ◆ Review and evaluation of aerial photography and other related chronological resources to document the operational development of the subject property.
- ◆ Summary of existing environmental investigation information and a description of the nature and extent of identified environmental contamination

on and within the vicinity of the subject property, including a summary of existing soil, groundwater, surface water, and source tracing (sediment data will be evaluated as necessary to aid in the interpretation of source control issues). Any known and/or potential contaminants of concern will also be included.

- ◆ Identification and evaluation of potential pathways for transport of contamination to LDW sediment; the results of the recently-completed groundwater pathways assessment determining that it is not a pathway of contamination to LDW sediments will be discussed (PGG 2007).
- ◆ Evaluation of the operational effectiveness of existing subject property infrastructure, including stormwater and drainage systems, roads, utility networks, etc. with respect to their influence on environmental conditions and long-term source control strategy for the subject property.
- ◆ Summary of existing information from available environmental investigations and cleanups on directly adjoining properties as deemed relevant to future source control efforts on the subject property.
- ◆ Identification of potential ongoing or historical sources of contamination to the subject property to the extent they can be determined. Relevant regulatory standards and the data source(s) will be presented along with available environmental data.

Maps, figures, tables, etc. useful to further the understanding of the physical and environmental conditions of the site will be included as part of the report. The Environmental Conditions Report will only include data that is deemed technically adequate for use in the evaluation of potential historical or ongoing sources of contaminants of concern on or to the subject property. Datasets determined to be inadequate for inclusion in the report will be identified and the rationale for their exclusion will be discussed. Environmental data for which associated regulatory standards or sources are unavailable will be qualified as such.

The report will provide the list of documents and source materials used to develop the summation and appropriate citations will be provided. To the extent possible, key information in these source documents (e.g., as-built drawings) will be reproduced as a component of the Environmental Conditions Report. Reference materials discussed but not included in the report will be provided to Ecology in hard copy and electronic format.

Following summation and evaluation of available subject property information, the report will provide conclusions about the current environmental conditions of the subject property, potential pathways for transport of contamination, and general recommendations/suggestions for proceeding forward with the management of the SCSP for the site. The report will also identify real or perceived environmental data gaps relevant to the subject property. These data gaps and the specific actions

intended to address them will be further discussed in the SCSPs to be developed for the eastern and western parcels of the subject property, as appropriate. The components of these plans are discussed further in Sections 4 and 5.

The draft Environmental Conditions Report will be provided to Ecology for review and comment. The Port will provide a final version of the document to Ecology within 15 working days of receipt of Ecology's comments on the draft report. Section 5 provides information on the schedule of deliverables and key milestones for the T-108 SCSPs.

#### **4.0 Source Control Strategy Plans (Tasks 2 and 3)**

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Upon completion of final Environmental Conditions Report and concurrence with Ecology, the Port will develop SCSPs for the subject property. The SCSPs will use the conclusions and recommendations provided in the final Environmental Conditions Report as well as the identified data gaps to develop comprehensive, long-term approaches to site-wide source assessment, monitoring, and the implementation of appropriate source control measures. Source control measures may include remedial action(s), as appropriate based on the derived strategy for the subject property. Inasmuch as the two parcels of the subject property each have their own unique operational histories and environmental features (see Map 2), the Port will prepare separate SCSPs for the Eastern and Western Parcels of the subject property, to be completed as Tasks 2 and 3, respectively.

The Port's SCSPs will provide the framework used to identify and assess source control issues on the subject property, determine the most appropriate and effective implementation and control systems (e.g., best management practices [BMPs], remedial actions), and establish long-term monitoring procedures to assess source control performance and ongoing environmental conditions at the subject property. The success of the Port's strategy at the subject property will depend on coordination and discussion with Ecology representatives, continued adjustment of the program's focus pending source control-related assessments, and integration of the program's requirements with property tenants, as applicable.

The Port and its tenants are required to comply with the appropriate federal, state, County, and City regulations relevant to source control concerns on their property. Through its lease agreements, the Port has the authority to inspect its own properties, and require that tenants comply with the appropriate governing environmental regulations within the Port's legal limits as outlined by established lease agreements and relevant permit requirements. The Port multi-phased tenant compliance program includes:

- ◆ Review of proposed leases to identify potential operational and/or procedural concerns that may influence environmental conditions

- ◆ Completion of property walkthroughs prior to initial occupancy and/or upon exit
- ◆ Periodic multi-media inspections and assessments specific to the types of operational activities conducted by the tenant and based on established regulatory requirements and responsibilities (permits, etc.)
- ◆ Inspections that focus on industrial tenants whose operations may impact stormwater discharges, recommending BMPs and control measures as appropriate
- ◆ Inspections and assessment of hazardous waste-generating activities and hazardous materials storage and use on its properties

In consideration of the Port's subject property, some of the goals to be outlined in the SCSP include:

- ◆ Minimizing the potential for contaminants to impact upland media (e.g., groundwater, soil, surface water) on the subject and adjacent properties, especially with respect to the ultimate influence those contaminants may have on sediment in the LDW
- ◆ Developing a clear understanding of the physical features, operational demands, and infrastructure systems at the subject property to effectively assess and monitor areas of potential source control concern
- ◆ Clearly identifying the roles and responsibilities for implementation and management of source control related concerns on the subject property (including permittee responsibilities, tenant lease-specific requirements, etc.) based on established regulatory programs and procedures (Port compliance programs, NPDES, MTCA, etc.)
- ◆ Promoting the understanding and effective implementation of source control measures, good housekeeping practices (e.g., BMPs), remedial actions, and source tracing monitoring programs through clear communication, education, and ongoing coordination with the subject property's tenants as established in the approved lease agreements.
- ◆ Ensuring the continued success of the existing habitat mitigation area
- ◆ Satisfying any potential public involvement process for independent remedial actions that may be determined to be useful at the subject property

In general, the SCSPs to be developed by the Port will focus on meeting the above mentioned goals while setting the basis for the implementation of the comprehensive source control program. The plans will likely require periodic updating or alteration as conditions and issues at the site are reassessed. Information concerning updates to these plans will be provided to Ecology as separate memoranda or as part of the quarterly monitoring status program proposed in this work plan (see Section 5.0).

At a minimum, each SCSP will include (on a parcel-by-parcel basis):

- ◆ General discussion of the extent of environmental contamination (all media types) identified through the evaluation completed for the Environmental Conditions Report (Task 2)
- ◆ Further evaluation of the pathways identified in the Environmental Conditions Report that were determined to have the potential to transport contaminants to the waterway. A conceptual site model (CSM) will be prepared for each of the strategy areas after completion of this pathways evaluation to aid in the understanding of the sources of contamination and their potential affects on other site media and waterway sediment
- ◆ Results of the data gaps analyses completed as part of the Environmental Conditions Report (Task 2), specifically in the context of how each of the data gaps will affect implementation of the source control strategy at the subject property
- ◆ Plans and procedures for completing additional source identification and characterization efforts, including collection of additional multi-media environmental data, as necessary (depending on the media to be sampled and the extent of the program, sampling and analysis plans and quality assurance project plans may be required to outline procedures and methodology for each sampling program)
- ◆ Proposed site measures including assessment and feasibility of low-environmental-impact infrastructure improvements (i.e., permeable paving, vegetated buffer zones, bioswales), along with remedial actions, and other techniques deemed appropriate for controlling sources, including multi-media monitoring requirements to establish initial analytical conditions and to assess instances of recontamination
- ◆ Standards and criteria required to establish source control program effectiveness and completeness with respect to Ecology's requirements for subject property source control
- ◆ Procedures for revising the strategy plans as updated analytical and infrastructure information is gathered for the subject property
- ◆ Ensuring that the strategy promotes the ongoing industrial, commercial, and maritime use of the property, including vessel berthing with shoreline access

The SCSPs for the Eastern and Western Parcels of the subject property will clearly consider the unique operational and environmental aspects of the parcels and be sensitive to the day-to-day requirements of the tenants operating on the subject property. Some of the parcel-specific aspects to be incorporated in the plans include:

## Eastern Parcel

- ◆ Location of the former WWTP, sludge beds, and related discharge infrastructure and the potential association to identified impacts to area sediment.
- ◆ Existing stormwater collection infrastructure and established procedures for monitoring of inputs, cleaning procedures, etc.
- ◆ A discussion of tenant-operated maintenance procedures and materials handling and storage practices, and the ongoing potential as a source to subject property soil, groundwater, and surface water (referencing established permit requirements, as appropriate).
- ◆ Empty cargo container storage and its potential to introduce sources of contamination originating from outside the boundaries of the subject property.

## Western Parcel

- ◆ Unpaved surface area and surface water drainage patterns and necessary infrastructural improvements
- ◆ Areas of existing stormwater infrastructure (southern portion of the parcel), established procedures for monitoring of inputs and cleaning procedures (based on established permit requirements, etc.), and integration with proposed western parcel stormwater infrastructure upgrades, etc.
- ◆ Habitat mitigation area integration and relationship with the parcel's overall drainage and stormwater concerns
- ◆ Identification of areas of armored and unarmored shoreline and slope design and structural effectiveness, etc.
- ◆ Nearshore contaminated sediment characteristics and potential relationship to shoreline conditions and ongoing operations on the subject property
- ◆ Nearshore infrastructure features (e.g., docks) and their existing and long-term usefulness to future subject property operational requirements
- ◆ Assessment of existing vegetative buffer and its effective incorporation to the overall infrastructure improvements to be established for the parcel

As mentioned previously, other components deemed to be important to the successful implementation of a comprehensive program for the subject property may be added to the program as determined by the Port and through discussions with Ecology. Some additional aspects of the strategy plans to be considered may include coordination with ongoing sediment investigations in the vicinity of the subject property and collaboration with the City, County, and the Source Control Work Group's source tracing sampling efforts (including outfall discharge assessment and atmospheric deposition concerns).

Each SCSP will provide a schedule for program implementation and an outline for reporting requirements that will document the ongoing results and status of the programs. Additional discussion concerning reporting to be performed during implementation and management of these programs is included in Section 5.0.

## 5.0 Program Implementation and Status Reporting Schedule (Task 4)

Table 1 provides a schedule for completion of this work plan and submittal of the deliverables outlined in Tasks 1 through 3. A draft version of each deliverable will be provided to Ecology for review and comment prior to completion and submittal of the final document. This deliverable schedule assumes 15 working days for Ecology’s review of the draft work plan documentation and draft reports for Tasks 1 through 3. Ecology’s acceptance of the final version of the each deliverable is also assumed to be 10 working days. Additional time may be required for negotiation with Ecology for each strategy program as well as time for necessary public notification depending on the aspects of the strategy deemed appropriate for implementation (remedial actions, etc.).

**Table 1. Deliverable schedule for T-108 source control program**

DOCUMENT NAME/DELIVERABLE	DATE DUE TO ECOLOGY
<b>T-108 Source Control Strategy Work Plan</b>	
Final Work plan (this document)	February 29, 2008
<b>Task 1. Environmental Conditions and Data Gaps Analysis Report</b>	
Draft report	60 working days from submittal of final work plan (approximately May 23, 2008)
Final report	15 working days from receipt of Ecology’s comments on the draft (approximately July 3, 2008); Ecology’s approval of the final anticipated by July 18, 2008
<b>Task 2. Source Control Strategy Plan (Eastern Parcel)</b>	
Draft report	30 working days from approval of the final Environmental Conditions and Data Gaps Analysis Report (approximately August 29, 2008)
Final report	15 working days from receipt of Ecology’s comments on the draft (approximately October 10, 2008); Ecology’s approval of the final anticipated by October 24, 2008
<b>Task 3. Source Control Strategy Plan (Western Parcel)</b>	
Draft report	20 working days from the submittal of the draft SCSP for the Eastern Parcel (approximately September 26, 2008)
Final report	15 working days from receipt of Ecology’s comments on the draft (approximately November 7, 2008); Ecology’s approval of the final anticipated by November 21, 2008

Once the SCSPs have been implemented at the subject property, the Port will provide Ecology with status reports documenting the program activities in progress at the subject property, as appropriate. The status reports will present results of analytical and environmental investigations conducted at the subject property as outlined in the

approved strategy plans and provide a discussion of other activities completed (e.g., infrastructure improvements, changes in standard operational procedures).

The status report will be provided on a semi-annual basis in memorandum format; the first status report will be submitted 120 working days after receipt of final approval of the SCSPs. Status reporting requirements may be modified by the Port with agreement from Ecology. One status report will be prepared jointly to discuss ongoing Eastern and Western Parcel activities unless implemented efforts warrant an individual, parcel-specific discussion. Status reports will be prepared until potential source control concerns noted in the SCSPs are determined by Ecology to be effectively addressed at the subject property. The Port will ensure that Ecology is kept apprised of all source control-related activities conducted at the subject property.

## **6.0 References**

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