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CONTAMINATED MEDIA MANAGEMENT PLAN - DRAFT

HAT ISLAND SUBMARINE CABLE REPLACEMENT
EVERETT, WASHINGTON

by
Haley & Aldrich, Inc.
Seattle, Washington

for
D. Hittle & Associates, Inc.
Kennewick, Washington

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List of Acronyms and Abbreviations

Acronym/Abbreviation	Definition
bgs	below ground surface
BTEX	benzene, toluene, ethylbenzene, and xylenes
CMMP	Contaminated Media Management Plan
DOSH	Washington Division of Occupational Safety and Health
Ecology	Washington State Department of Ecology
EFD	Everett Fire Department
EIN	EPA Identification Number
EPA	U.S. Environmental Protection Agency
ESU	Engineering soil units
Haley & Aldrich	Haley & Aldrich, Inc.
HDD	horizonal direction drilling
MLLW	mean lower low-water
MTCA	Model Toxics Control Act
OER	owner's environmental representative
PID	photoionization detector
PCB	polychlorinated biphenyls
PCS	petroleum-contaminated soil
PLP	potential liable party
Port	Port of Everett
PPE	personal protective equipment
ppm	parts per million
PQL	practical quantification limit
PSL	preliminary screening levels
RI/FS	remedial investigation/feasibility study
SVOCs	semi-volatile organic compounds
TCLP	Toxicity Characteristic Leaching Procedure
TPH-D	total petroleum hydrocarbons diesel-range
TPH-G	total petroleum hydrocarbons gasoline-range
TPH-O	total petroleum hydrocarbons oil-range
TSDF	treatment, storage, and disposal facility
UST	underground storage tank
VOC	volatile organic compounds
WAC	Washington Administrative Code
WPQ	Waste Profile Questionnaire

1. Introduction

The Hat Island Submarine Cable Project (Project) is located in the southwest portion of the Equipment Storage Area ("Boneyard") at the south end of the Port of Everett (Port) and located in the Upland Area of the Weyerhaeuser Mill A Site (Site) at 2890 Terminal Ave in Everett, Washington (Figure 1). The Project area is within Snohomish County tax parcel (29042500400200).

The Site is one of several sites located on the waterfront that is planned for cleanup under Washington State's Puget Sound Initiative. The Site was formerly used for a range of industrial activities including pulp manufacturing, saw milling, ship building, shingle milling, and log handling, and was in operation from the 1890s to the early 1980s. The Port purchased the property in 1983 and, in 1987, developed the property for use as a log yard. Log handling operations were performed there until around the mid-2000s. The Site is currently being used as a cargo terminal and the Project area is currently being used as an equipment laydown and storage area.

The Project consists of installing a submarine cable to provide an updated power line to the residents of Hat Island. The submarine cable is proposed to span the portion of Possession Sound between Hat Island and the southwest portion of the Equipment Storage Area at the Port. The new cable is anticipated to be installed using horizontal directional drilling (HDD) for the cable alignment through a zone of environmentally unfavorable soils. The means and methods of drilling and installation of the cable will be determined by the contractor and will likely include the following:

- Excavating soil for the HDD equipment and to potentially install a vault. Depth of the excavation has not been determined.
- Installing casing that will be seated and grout sealed into uncontaminated soils. The spoils from within the casing will most likely be contaminated and will be removed for off-site disposal at an appropriate facility. Soil may be considered hazardous based on previous environmental investigations analytical results and additional chemical testing of soil cuttings may be needed.
- Continue HDD to complete the installation of the new power cable.

The purpose of this Contaminated Media Management Plan (CMMP) is to describe the proposed plan for the management of known and suspected environmentally-impacted soil and unexpected adverse environmental conditions that may be encountered during construction. The plan will identify areas of known and suspected soil contamination, common-sense criteria for recognizing suspected materials based on appearance, odor, etc., and will identify the chain of command for notification during construction.

Environmental and geological conditions within the Project area were reviewed from the following reports:

- Upland Source and Groundwater Investigation Data Report, prepared by GeoEngineers, dated 24 March 2010;
- Remedial Investigation/Feasibility Study (RI/FS) Work Plan, prepared by GeoEngineers, dated 16 October 2014;
- Draft Interim Action Work Plan, prepared by GeoEngineers, dated 14 August 2015;

- Upland Area Remedial Investigation Data Report Technical Memorandum, prepared by GeoEngineers, dated 19 March 2018;
- Work Plan Addendum No. 6, prepared by GeoEngineers, dated 1 October 2019;
- Tier 1 Upland Area Soil Investigation Data Report Technical Memorandum and Proposed Additional Soil and Groundwater Sampling and Analysis, prepared by GeoEngineers, dated 7 December 2021.
- Draft Geotechnical Assessment, prepared by Haley & Aldrich, Inc. (Haley & Aldrich), dated 1 November 2022.

A site plan identifying previous explorations and environmental sampling locations is on Figure 2. Analytical data were reviewed from these listed reports, where provided and pertinent environmental conditions are summarized in the section below.

2. Property Background

In 2012, an Agreed Order DE8979 was established for the Site between Washington State Department of Ecology (Ecology) and the Potentially Liable Parties (PLP) – the Port, Weyerhaeuser, and Washington State Department of Natural Resources. The Site is currently listed in Ecology's database of confirmed and suspected contaminated sites under Facility/Site Number 1884322 and Cleanup Site ID 2146.

From the 1890s to the early 1980s, the Weyerhaeuser Mill A Site was used primarily for sawmill and pulp mill operations. The South Terminal wharf was originally constructed in the 1970s by Weyerhaeuser and is comprised of a 700-foot-long pile-supported wharf and adjacent navigation areas that accommodate heavy lifts, roll-on/roll-off, breakbulk and container cargo including aerospace, military, agricultural, cars, trucks, mining, energy, and construction equipment. The Port recently completed upgrades of the South Terminal Wharf to accommodate larger and heavier cargo as required by current customers and added two Post-Panamax-size container cranes. The shoreline is generally comprised of bulkheads and/or armored slopes extending to the base of the navigation area.

Most of the Upland Area is paved with asphalt or concrete and is used by the Port for terminal operations. A portion of the southern extent of the Upland Area is not paved and has a crushed gravel working surface for equipment laydown and storage (Equipment Storage Area).

Located between the mouth of Pigeon Creek and the Equipment Storage Area is a Public Beach Area. To the north and south of the public beach, the shoreline slope is armored with heavy stone.

2.1 ENVIRONMENTAL INVESTIGATIONS

In January 2010, the Port conducted the initial phase of an independent upland source and groundwater investigation to evaluate potential contamination at the Site (including the Project area located on the southern side of the Equipment Storage Area) that may have resulted from historical uses of the property. This independent investigation was conducted in coordination with Ecology who provided technical assistance in the form of review and comment on the site investigation work plan. A report documenting the results of the upland investigation was provided to Ecology in March 2010. As part of the 2012 Agreed Order, an RI/FS and a Draft Cleanup Action Plan, was to be performed.

The RI/FS work plan was submitted to Ecology in 2014 and later approved. Subsequently, further soil and groundwater investigations were completed between July 2016 and March 2017 in the upland portion of the Site to characterize subsurface conditions and evaluate the nature and extent of contamination. The sampling activities and analytical results for the soil and groundwater investigations in the Upland Area were summarized in the Upland Area Remedial Investigation Data Report Technical Memorandum (GeoEngineers, 2018). In response to Ecology's comments, GeoEngineers prepared a Work Plan Addendum No. 6 (GeoEngineers, 2019) on behalf of the Port to describe the proposed approach for additional investigation activities in response to the comments.

The Tier 1 Upland Area Soil Investigation Data Report Technical Memorandum and Proposed Additional Soil and Groundwater Sampling and Analysis (GeoEngineers, 2021) memorandum presents the results of soil data collected between April and May 2021 in accordance with Work Plan Addendum No. 6 (GeoEngineers, 2019).

Soil and groundwater analytical data from locations adjacent to the proposed HDD cable replacement area was reviewed from relevant reports and is summarized below.

2.1.1 Upland Area Remedial Investigation Data Report (GeoEngineers, 2018)

The soil analytical data near the Project area was collected from the following borings and depths collected at the south end of the Equipment Storage and Public Beach Areas.

- EDP22 from 2-3, 6-7, 12-13, 14-15, and 16-17 feet below ground surface (bgs)
- EDP41 from 3-4, 6-7, 11-12, and 14-15 feet bgs
- EDP42 from 1-2, 7-8, 12-13, and 15-16 feet bgs
- EDP43 from 2-3, 4-5, 11-12, and 16-17 feet bgs
- EST16 from 3-4, 10-11, 15-16, and 24-25 feet bgs

The soil and groundwater analytical data was compared to preliminary screening levels (PSLs) to evaluate the nature and extent of contamination. The following analytical concentrations were found to be greater than the PSLs.

- EDP22 – copper, lead, mercury, selenium, thallium, zinc, benzene, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), polychlorinated biphenyls (PCBs), and dioxins/furans.
- EDP41 – copper, lead, mercury, nickel, selenium, thallium, zinc, cPAHs, and dioxins/furans.
- EDP42 – copper, lead, mercury, nickel, zinc, oil-range hydrocarbons, benzene, cPAHs, PCBs, and dioxins/furans.
- EDP43 – copper, PCBs, and dioxins/furans.
- EST16 – chromium, copper, lead, mercury, zinc, benzene, cPAHs, PCBs, and dioxins/furans.

Due to the elevated concentrations of metals in the soil samples, soil may be classified as hazardous around EDP42 (sample from 15 to 16 feet bgs) and EST16 (samples from 10 to 11 feet bgs and 15 to 16 feet bgs).

Groundwater was only analyzed from monitoring well EST16. In April 2017, the groundwater sample contained lead concentrations that exceeded the PSL, but did not exceed the PSL from the September 2016 sampling event.

2.1.2 Tier 1 Upland Area Soil Investigation Data Report (GeoEngineers, 2021)

In accordance with the Work Plan Addendum No. 6, additional soil characterization was completed between April and May 2021. The soil analytical data near the Project area was collected from the following borings and depths collected at the south end of the Equipment Storage and Public Beach Areas.

- EDP66 from 0 to 1 and 2 to 3 feet bgs
- EDP69 from 0 to 1 and 2 to 3 feet bgs
- EDP70 from 0 to 1 and 2 to 3 feet bgs
- EDP71 from 0 to 1 and 2 to 3 feet bgs
- EDP72 from 2 to 3 and 6 to 7 feet bgs
- EDP73 from 2 to 3 and 6 to 7 feet bgs
- EDP84 from 2 to 3 and 6 to 7 feet bgs

The following analytical concentrations were found to be greater than the PSLs.

- EDP66 – nickel and selenium
- EDP69 – copper, dioxins/furans
- EDP70 – dioxins/furans
- EDP71 – selenium
- EDP72 – copper, lead, mercury, nickel, selenium, silver, thallium, and zinc
- EDP73 – arsenic, copper, mercury, nickel, selenium and zinc
- EDP84 – copper and zinc

Due to the elevated concentrations of metals in the soil samples, soil may be classified as hazardous around EDP72 (samples from 2 to 3 feet and 6 to 7 feet bgs), EDP73 (sample from 2 to 3 feet bgs), and EDP84 (sample from 6 to 7 feet bgs).

Groundwater was not sampled in the Project area during this investigation.

2.2 PROJECT GEOLOGY AND HYDROGEOLOGY

The geology and hydrogeology of the Project area is based on previous environmental investigations and a geotechnical investigation conducted by Haley & Aldrich (2022).

2.2.1 Geology

Development of the Site has included filling of the former marine shoreline area to create the Upland Area. Based on previous environmental investigations, the stratigraphy in the Equipment Storage and

Public Beach Areas consists of 10 to 22 feet of fill soil with traces of debris fragments (asphalt, brick, wood, etc.) and with intermittent wood debris lenses overlying native sand and silt.

During the geotechnical investigation, boring HA22-1 was advanced in the Project area and encountered approximately 10 feet of loose to medium dense sand and gravel fill with variable amounts of silt, organics, and detritus, overlying a 12.5-foot-thick layer of dense sand with silt and gravel, beach and bluff deposits. The bottom of the beach and bluff deposits were observed to consist of a 4.5-foot-thick layer of wood debris, between 18 and 22.5 feet bgs. Very dense to very stiff glacially overridden soils were encountered below the bottom of the wood debris layer and through the bottom of the test exploration to an 80.4-foot depth. The top 11.5 feet (22.5 to 34 feet bgs) of the glacially overridden soils consisted of a silty sand with gravel and scattered organics, glacial outwash soil. Below the glacial outwash from a 34-foot depth to the bottom of the boring at 80.4 feet, the soils were observed to be generally glacio-lacustrine soils consisting of interbedded layers of clays and silts, with various amounts of sand. Between depths of 59 to 68 feet, a very dense silty gravel layer with sand was encountered.

It is important to note that the subsurface conditions are quite variable and, given the nature of glacially consolidated and recessional materials, it should be assumed that zones of coarse-grained material (cobbles and boulders) and zones of collapsible sands may be encountered along the route of the horizontal drilling. Additional information on soil conditions can be found in the geotechnical assessment report (Haley & Aldrich, 2022).

2.2.2 Hydrogeology

At the time of the geotechnical investigation in July 2022, the groundwater table was estimated to range from 10 to 15 feet bgs at the Project area, based on observed moisture conditions of our drilling samples. Due to the nature of mud-rotary drilling, an exact groundwater elevation could not be observed at the time of drilling. However, in September 2016, the shallow monitoring well in the Project area (EST16) had a measured depth to groundwater of 11.5 feet bgs and an elevation of 9.3 feet mean lower low-water (MLLW) datum.

The groundwater table is anticipated to be tidally influenced and fluctuate with the high and low tides of the adjacent Puget Sound. The nearest National Oceanic and Atmospheric Administration (NOAA) station gauge (Station ID 9447130) is located in Seattle, Washington. Tidal information is available to the public on NOAA's website <https://tidesandcurrents.noaa.gov/>.

3. Soil Management

As detailed in above Section 2.1, soil may be considered hazardous due to elevated concentrations of metals in soil near borings EDP42, EST16, EDP72, EDP73, and EDP84. Excavated soil will need to be screened and sampled if suspect impacts are noted based on the previous subsurface investigation observations and results and the past historical uses on the Project area.

The following sections detail field screening, characterization, and management strategies for potentially impacted soils generated during earthwork construction activities.

3.1 SOIL FIELD SCREENING

Visual observations of the following characteristics may indicate potential adverse environmental conditions. If any of the following are observed during construction activities, field personnel will immediately notify the owner's environmental representative (OER) to evaluate the condition. They will also notify their health and safety representatives so each firm can determine the protective measures to be implemented, which could include personal protective equipment (PPE) and engineering and/or administrative controls. Potential environmental impacts may appear to be:

- Oily or greasy appearance with visible oil droplets, film, or sheen;
- Tar, chemical sludge, or gummy resinous substance;
- Distinct color changes;
- Foam, scum, gel, slime, or soapy liquid material;
- Fibrous material, particularly white or gray;
- Powder, grit, or machine-formed pellets indicative of chemicals;
- Pipelines or abandoned containers such as drums or tanks;
- Molten slag with glassy, metallic, rock-like, or clinker appearance;
- Electrical equipment such as transformers, batteries, or capacitors;
- Mist or smoky discharge; or
- Unnatural color flecks or smears in the soil.

The CMMP does not recommend that field personnel smell suspected hazardous substances; doing so could present a health and safety hazard. However, if odors are detected inadvertently, it may indicate potential adverse environmental conditions. If any of the following odors (or any unusual odors) are detected during construction activities, field personnel will immediately notify the OER to evaluate the condition and notify their health and safety representatives, so each firm can determine the protective measures to be implemented. Protective measures could include PPE and engineering and/or administrative controls. Odors that may indicate environmental impacts include those of:

- Gasoline;
- Paint thinner;
- Furniture polish;
- "Magic marker" pen;
- Rotten eggs or "skunky" odor;
- Mothballs;
- Sewage;
- Sharp, sweet, ether-like odor; and,
- Other solvent or chemical-like odors.

3.2 RESPONSIBILITIES

Table 1 describes the responsibilities for notification, field procedures, and coordination of off-site disposal efforts for suspected hazardous materials encountered during excavation and construction.

Table 1. Notification and Follow-Up Actions

Steps	Action	Responsible Parties
1	Develop a site-specific plan for handling, sampling, analyzing, and disposing of suspected hazardous materials.	OER
2	Initiate notification sequence.	Any person who discovers the potential environmental issue
3	Field-screen soil with a photoionization detector (PID).	OER
4	Segregate and stockpile suspected hazardous materials for observation and sampling (or otherwise isolate area of concern).	General contractor
4A	Pump out water with evidence of potential impacts (e.g. sheen, odors) from excavation areas (if encountered) and temporarily store on the Project area in Baker tanks or similar.	General contractor
5	Stake out and number/label suspected hazardous material soil stockpiles and collect characterization samples for chemical analysis at a laboratory.	OER
5A	Maintain stockpile in a protected manner until transported for off-site disposal. Maintain staked identification number.	Excavation contractor
6	Collect characterization samples to analyze for the presence of petroleum-impacted soil or suspected hazardous material.	OER and analytical lab
7	Collect and analyze verification samples to characterize soils remaining in the excavation area from which suspected hazardous material soils were removed, if needed.	OER
8	Sign uniform hazardous waste manifest or other shipping documentation (e.g., bill of lading) and/or waste profile questionnaire.	Owner
9	Select off-site disposal facilities for regulated hazardous materials, construction debris, and non-regulated solid waste.	Owner
10	Prepare letter to disposal facility with compiled laboratory testing results and prepare agency notifications and annual report(s) for owner's signature as required.	OER
11	Coordinate shipment of regulated waste for off-site treatment, storage, or disposal (including stockpiling at interim off-site storage facility, if necessary).	Excavation contractor, hazardous waste contractor, and transporter
12	Provide truck trip tickets to OER (copies to owner and excavation contractor) that document delivery to the off-site disposal facility.	Transporter

3.3 NOTIFICATION PROCESS

Soil, groundwater, debris, other materials with potential impacts, or other environmental conditions may be discovered by the contractor, subcontractor, OER, or other personnel during excavation activities. The lessee and owner must be notified immediately by whoever makes the discovery. The lessee and/or owner will promptly notify the OER for further assessment and chemical analysis. The lessee, owner, or OER will promptly notify the contractor of the potential extent of the issue. Table 2 will be used to notify the responsible parties. The form included in Attachment 1 will be used to record the environmental condition and to document the notification process.

Table 2. Contact Information for Responsible Parties			
Party	**Address**	**Contact**	**Contact Numbers**
Lessee – **Snohomish County PUD #1**	1802 75th St SW, Everett, WA 98203	Eric Schneider	425.783.8624
Property Owner – **Port of Everett**	1205 Craftsman Way #200, Everett, WA 98201	Erik Gerking	206.234.1991
Civil Engineer – **D. Hittle & Associates**	7515 W Deschutes Ave, Kennewick, WA 99336	Bob Schneider	206.999.6373
Drilling Consultant – **STAHELI**	4100 194th St SW #205, Lynnwood, WA 98036	Jake Andresen	206.715.4814
General Contractor – **TBD**			
Subcontractor (non-regulated and regulated soil trucking [non-hazardous]) – **TBD**			
Non-regulated soil disposal facilities - **TBD**			
Regulated soil disposal facility (non-hazardous) – **TBD**			
Hazardous soil disposal facility – **TBD**			
Regulated water trucking – **TBD**			
Regulated water disposal facility – **TBD**			
OER – **Haley & Aldrich**	3131 Elliott Avenue, Suite 600 Seattle, Washington 98121	Angie Goodwin	206.954.2549 (cell) 206.324.9530 (main)
Notes: *TBD = To Be Determined* *The responsible parties and any updates will be filled in as information becomes available.*			

At the time any suspected hazardous material is discovered, normal excavation and construction activities involving the suspected material will cease, pending evaluation by the OER in consultation with the lessee, owner, and other affected parties. The suspected hazardous material will not be further disturbed or touched without appropriate worker protection (PPE and/or engineering controls) and environmental precautions.

Reporting to the Washington State Department of Ecology (Ecology) may be required for some environmental conditions, including confirmed releases of hazardous substances that may pose a threat to human health or the environment. Reporting requirements are detailed in Ecology's 8 April 1992, *Site Discovery – Release Reporting Policy 300* as revised 10 June 2004.

To determine whether a release of a hazardous substance poses a threat or potential threat to human health or the environment, Policy 300 states people should use their "best professional judgment" using Chapter 173-340 of the Washington Administrative Code (WAC), the guidance in Policy 300, and their professional training and experience. If the best professional judgment is that the release does not pose a threat or potential threat, then the release does not need to be reported to Ecology.

No one will report to Ecology unless specifically directed to do so in writing by the owner.

3.4 FIELD PROCEDURES

Once notified about the potential presence of suspected hazardous material(s), the OER will evaluate the material(s) and affected areas to determine their type, the extent, and the actions to take. The OER will also determine appropriate handling and sampling methods for the suspected hazardous materials.

The contractor will notify the OER before any suspected or confirmed soil containing hazardous materials is excavated or stockpiled. The contractor will inform the OER of where the soil stockpiles containing suspected hazardous materials are located.

3.5 CONTROL OF SUSPECTED POTENTIAL IMPACTS

Material suspected of potential impacts should not be stored or mixed with other materials. Only after the type and extent of hazardous substances and the nature and degree of risk associated with the materials have been determined may the materials be stored or mixed together. The OER will determine whether incompatible materials may be present and discuss appropriate handling and storage procedures with the contractor.

3.6 CONTROL OF CONTAMINANT RELEASE

If suspected hazardous material(s) must be excavated, excavation will only occur after visual observation in the field and/or sampling and analysis by the OER. The OER will work with the contractor to determine whether:

- dust emissions, runoff, fumes, and so forth may need to be mitigated to control the migration of suspected hazardous materials into other areas (cross-contamination) or to dewater an excavation;
- PPE and/or engineering controls are sufficient for worker safety or if they need to work with their health and safety representatives to be upgraded; and/or
- on-site air and/or personal exposure monitoring is needed to detect whether concentrations of suspected hazardous materials are above exposure limits.

The need for and extent of any special construction measures will depend on the type and amount of hazardous materials encountered during excavation and on the expected or known concentrations of these materials. The OER will confer with the lessee, owner, and contractor about the recommended approach for controlling hazardous material releases and worker exposure or minimizing the potential for migration.

3.7 SEGREGATION AND STOCKPILING

Suspected hazardous material(s) will be excavated or separated from other soil and debris by the contractor and then stockpiled. Stockpiling means and methods are up to the contractor and could look like placing suspect material on plastic sheeting in piles that do not spill over the edge of the plastic. The stockpiles will be marked by the OER with wooden stakes or other comparable methods using a unique numbering system or through other means to reference the point of origin of the material on the Project area. The contractor will see that the stockpile stakes are maintained until the stockpiles are removed from the Project area.

Excavated soil, drilling spoils, and other materials suspected of containing hazardous substances will be controlled in a way that prevents them from mixing with non-impacted soil at the Project area. The contractor will cover all soil stockpiles with additional plastic sheeting or other means as necessary to prevent wind erosion and runoff during precipitation. Any free liquids leaching from soil stockpiles will be contained with sorbent berms and absorbed by applying granular sorbent, absorbent pads or booms, or similar. The contractor will further protect the stockpiles as necessary from disturbance by water, wind, animal, or human contact. No vehicular traffic will be allowed on or between soil stockpiles, as traffic might cause erosion or damage to the stockpiles.

The contractor will also handle and protect suspected hazardous materials in a way that protects workers and the environment. Worker protection during excavation and handling will be the responsibility of the contractor.

Before beginning excavation for the HDD equipment and potential vault, the OER and contractor will identify specific areas on a site plan for temporarily stockpiling suspected or confirmed hazardous materials. Suspected hazardous materials will be segregated based on their compatibility with other suspected hazardous materials and their physical properties using the criteria provided in Section 3.1, field screening instruments, and results of chemical analysis provided by the OER. If necessary, the contractor (in conjunction with the transporter designated to remove the soil from the Project area) may identify an interim off-site storage location for temporary storage of soil stockpiles before disposal. Stockpiling protocols for interim off-site locations are the same as those for on-site stockpiling. The contractor and transporter will maintain the numbered stockpile stakes at the interim storage locations until the soil is transported off the Project area for reuse or disposal. Interim off-site storage locations will be approved in writing by the lessee and owner before the materials are transported to an off-site location.

The contractor and transporter will continue to track stockpiles and associated truck trip numbers during temporary off-site storage. Stockpiles will not be mixed in common truckloads unless approved in advance by the OER.

Suspected hazardous material from the excavation and stockpiles will not be removed from the Project area until samples are collected and chemical analysis is completed to characterize hazardous substances and concentrations and the materials are designated for final disposition (i.e., reuse or disposal). The decision to move suspected hazardous materials from the Project area to an off-site facility will be recorded in a written form from the contractor to the OER, lessee, and owner.

3.8 DOCUMENTATION AND RECORDKEEPING

The OER will keep records specific to the Project area to track and document the discovery and stockpiling of suspected hazardous materials. The documentation may include:

- date and time of discovery of suspected hazardous material;
- person or party discovering the material;
- person or party notifying the lessee and owner;
- date and time of notification of OER;

- specific locations of suspected hazardous material and stockpile(s) and the unique stockpile number provided by the OER;
- manner of handling and method of stockpile;
- suspected or confirmed types and concentrations of hazardous substances and other pertinent information;
- disposition decision;
- off-site receiving facility;
- date and time of notification to contractor of notification to off-site receiving facility; and
- date and time of removal from the Project area.

Recordkeeping will include documenting field observations, analytical results, truck trip ticket transportation records provided by the transporter, correspondence with off-site receiving facilities, and other report(s) generated from the work. The OER will copy correspondence from off-site receiving facilities confirming acceptance of regulated hazardous materials (e.g., uniform hazardous waste manifest, bill of lading) to the lessee, owner, and contractor.

3.9 EXCAVATION DEWATERING

A dewatering system may be required to manage groundwater during construction activities. The criteria discussed in Section 3.1 may be used as indicators of potential impacts. Excavated wet soil in the drill pit is recommended to be decanted in a lined stockpile area and soil and water segregated or similar.

Due to the nature of mud-rotary drilling, our borings did not encounter the groundwater table during our explorations. However, in September 2016, the shallow monitoring well in the Project area (EST16) had a measured depth to groundwater of 11.5 feet bgs and an elevation of 9.3 feet MLLW. Additionally, we would assume the regional groundwater table to follow the water elevation of the adjacent Puget Sound. Perched water may be encountered at higher elevations, specifically at the Project area on the Port side of the cable alignment.

Dewatering may be required depending on the extent of the excavations below the groundwater table. Based on the site conditions and the proposed excavation footprint, a dewatering system made up of sumps and baker tank may be recommended for construction dewatering. Water from excavation dewatering shall be temporarily stored on the Project area by the contractor (in an aboveground Baker tank or similar). The OER shall coordinate wastewater sampling and analysis and provide the results of chemical analysis to the contractor.

3.10 FIELD SCREENING METHODS

Various methods and equipment are available for field-screening suspected hazardous materials. Field screening can provide real-time information to target problem areas and make real-time decisions. Section 5.3 of Ecology's *Guidance for Remediation of Petroleum Contaminated Sites* briefly describes the more common field-screening methods. The OER will use field instruments and screening procedures to supplement the criteria described in Section 3.1 for characterizing and screening suspected hazardous materials. Screening will be done for volatile organic compounds (VOCs) in suspected hazardous materials. Field instruments or methodology will include a PID to detect vapors and a pan test to

observe for petroleum sheen. The PID detects volatile organic vapors released directly from impacted materials during excavation and from stockpiled materials. Alternately, the PID may be used to detect volatile organic vapors accumulating in the headspace of sample jars or plastic bags filled about one-half full, with representative soil samples.

If suspect soil or drill spoils are encountered, the material will be screened with a PID for VOCs. PIDs measure general VOC concentrations but do not identify the specific chemicals present; they also do not detect diesel, oil, or non-volatile compounds.

Other field screening procedures may be followed, depending on the nature of the suspected hazardous material. If necessary, the OER will collect samples for laboratory analyses of hazardous substances to verify constituent types and concentrations or to corroborate and confirm screening results.

3.11 CHARACTERIZATION SAMPLING AND CHEMICAL ANALYSIS

The OER will evaluate the suspected hazardous materials and, as deemed necessary and appropriate, collect samples for chemical analysis to determine whether the material is designated as a hazardous waste under Chapter 173-303 WAC (Ecology's Dangerous Waste Regulations) or is regulated under the Model Toxics Control Act (MTCA) or other applicable standards (e.g., landfill or disposal facility requirements). The OER will collect samples using appropriate clean sampling equipment and place them in glass jars with lids provided by the laboratory. Preliminary laboratory chemical analysis will be performed based on field screening results. Characterization sampling, analysis, or other additional testing may be required following preliminary results to comply with regulatory criteria or to designate the material for reuse, treatment, or disposal. Samples collected will be of sufficient quantity and appropriate type for chemical analysis.

The samples will be representative of materials in the area being evaluated. For VOC analysis, discrete samples will be collected to minimize the volatilization of constituents. Characterization of stockpiled soil is further addressed in Section 3.13.

Samples will be collected using clean sampling equipment and will be placed in clean glass sample containers. The non-dedicated sampling equipment will be cleaned before sampling and between samples. Equipment will be cleaned by scrubbing with a brush in a non-phosphate detergent solution, rinsing twice in tap water, and rinsing again with deionized or distilled water. The OER will complete chain of custody forms to accompany the samples to the analytical laboratory.

The OER will also collect verification samples to verify the characteristics of soil remaining in areas where soil with known or suspected hazardous materials has been excavated, as needed. Analytical results will be provided to the lessee, owner, and contractor for informational purposes.

3.12 UST REMOVAL PROTOCOLS

Unknown heating oil or other underground storage tanks (USTs) are not anticipated to be encountered during construction activities. However, if any unknown USTs are discovered, a licensed UST removal contractor will remove the USTs and complete closure in accordance with applicable and current UST regulations. The contractor will follow the protocols established under the following regulations and guidance documents for removal or closure of USTs:

- Ecology's UST regulations (Chapter 173-360A WAC);
- Ecology's 2003 *Guidance for Site Checks and Site Assessments for Underground Storage Tanks* (Publication #90-52);
- Ecology's 2006 *Underground Storage Tank Site Checks/Site Assessments Checklist* (ECY 010-158);
- City of Everett Fire Department (EFD) requirements; and
- Washington Division of Occupational Safety and Health (DOSH) Confined Space Regulations (WAC 296-155-203).

These protocols apply to USTs discovered during the excavation work. If USTs are discovered, the contractor will notify the lessee, owner, and OER immediately upon discovery. Ecology currently requires a 30-day notification period before removal of regulated USTs but may approve expedited closure in emergency situations in which product may be released. Fuel oil USTs are exempt from the Ecology notification requirements. An EFD permit with required documentation must also be obtained before USTs, including fuel oil USTs, are removed from the Project area. The Ecology notification and EFD permit application instructions are in Attachment 2.

The UST removal contractor will provide copies of all notifications, UST disposal documentation, and other UST closure records to the lessee, owner, and OER. The OER will observe the contractor's activities during closure of USTs and will collect representative soil samples to document subsurface conditions. The OER will summarize UST closure activities in the final closure report to the lessee and owner which includes analytical results from soil sampling during UST assessment and closure. If the UST is regulated in Chapter 173-360A WAC, the OER will prepare a closure report to Ecology on behalf of the owner.

If a release from a UST or its associated piping is discovered that poses a threat to human health or the environment, the release must be reported to Ecology to determine whether the UST is regulated under UST reporting regulations as provided in WAC 173-340-300.

3.13 SOIL STOCKPILE CHARACTERIZATION

Samples will be collected from soil stockpiles and submitted to a laboratory for chemical analysis to characterize the soil for appropriate off-site disposition. As necessary, samples will be analyzed for the following:

- Gasoline-, diesel-, and oil-range TPH by Methods NWTPH-Gx and NWTPH-Dx;
- Total metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver, copper, nickel, and zinc) by EPA Method 6020B;
- TCLP by U.S. Environmental Protection Agency (EPA) Method 1311 (if necessary); semi-volatile organic compounds (SVOCs) by EPA Method 8270E;
- PCBs by EPA Method 8082A; and
- VOCs by EPA Method 8260B.

Table 3 shows the number of samples Ecology recommends collecting to adequately characterize stockpiled soil; however, the final number of samples required is determined by the off-site receiving facility.

Table 3. Stockpile Sampling Summary	
Cubic Yards of Soil	**Number of Samples for Chemical Analysis**
0 to 100	3
101 to 500	5
501 to 1000	7
1001 to 2000	10
> 2000	10 + 1 for each additional 500 cubic yards
Source: *Ecology 2016 Revised Guidance for Remediation of Petroleum-Contaminated Soil*	

The OER's field representative will determine the appropriate number of samples to collect based on visual estimation of stockpile volume and discussions with the off-site receiving facility.

Discrete grab samples will be collected with hand tools 6 to 12 inches beneath the surface of the stockpile and immediately preserved according to Ecology recommendations. These samples should be collected from where field instrument readings indicate potential impacts are most likely to be present.

If field instruments do not detect potential impacts, the pile will be divided into sections and each section will be sampled. The number of samples may vary as necessary to characterize a soil stockpile, depending on site-specific conditions and, as applicable, the off-site receiving facility's requirements.

3.14 DISPOSAL OPTIONS FOR REGULATED MATERIALS

When field screening and/or chemical analysis indicates that excavated and stockpiled materials are hazardous waste regulated by Ecology's Dangerous Waste Regulations or contain hazardous substances that exceed MTCA cleanup or other regulated levels, the materials must be disposed of, treated, or recycled off-site. Disposition options depend on the regulations applicable to the hazardous substances contained in the material.

3.14.1 Petroleum-Contaminated Soil

Petroleum-contaminated soil (PCS) is considered solid waste. Options for handling PCS generated from excavation activities at the Project area include landfilling, asphalt/cement incorporation and treatment (e.g., thermal desorption), and recycling.

Landfilling PCS and the associated transportation costs increase cleanup costs. Heavily contaminated soil must be properly treated or disposed of to ensure that human health and the environment are protected. Moderately or lightly contaminated soil may be suitable for recycling or reuse. If PCS is designated as a hazardous waste or contains a listed waste, it generally is regulated as hazardous waste even with low contaminant levels and must be managed in accordance with Ecology's Dangerous Waste Regulations.

Landfills such as Republic Services Roosevelt Regional Landfill in Roosevelt, Washington, and Waste Management in Oregon accept PCS for disposal if it contains no free liquids and does not exhibit the characteristic of toxicity as determined by the EPA's TCLP. When PCS contains PCBs, the concentration must be less than 50 parts per million (ppm) for acceptance for disposal. A sample disposal request letter to Waste Management is provided in Attachment 3 as an example. Information typically requested by the soil disposal facility to profile the soil is provided in Attachment 4.

An alternative to landfill disposal is transporting the PCS to an off-site facility such as Lafarge Cement Seattle that will incorporate the soil into asphalt or concrete mixtures. With this method, PCS is temporarily stockpiled on the Project area or at another selected area, with an impermeable berm and liner, and later transported to the processing plant. During incorporation into asphalt or cement, petroleum compounds in the excavated PCS are volatilized and the PCS is converted into a non-regulated material, minimizing the generator's liability.

3.14.2 Chemically Contaminated Soil—Potential Hazardous/Dangerous Waste

Soil that contains hazardous substances may be designated as a hazardous/dangerous waste under Ecology's Dangerous Waste Regulations. If soil is designated as a hazardous/dangerous waste, it must be treated and/or disposed of at a permitted treatment, storage, and disposal facility (TSDF). The TSDF selected will depend on the type and concentrations of hazardous substances in the soil. For hazardous/dangerous waste that can be disposed of at a permitted TSDF, pre-disposal activities include characterization and documentation as specified in Ecology's Dangerous Waste Regulations. Those requirements are summarized in the next section.

3.15 SOIL DISPOSITION AND DOCUMENTATION

If impacted soil requires off-site disposal, the OER will make preliminary arrangements to gain approval and authorization from off-site facilities. Since disposal options depend on the type and quantity of soil involved and applicable regulations, the OER may recommend specific disposal options when the soil is characterized. The OER will work with the lessee, owner, and contractor to identify the appropriate off-site receiving facility. The lessee and owner will authorize the OER to implement the recommendations and submit the required letters and forms to the appropriate off-site facilities for approval.

3.15.1 Regional Landfill Disposal of PCS

For the disposal of PCS at a regional landfill such as the Roosevelt Regional Landfill, the following procedure will be used to notify appropriate parties and allow expedient handling, transportation, and disposal of the PCS.

Samples will be analyzed by a state-approved laboratory to quantify the hazardous substances of concern based on the known history of the Site and the hazardous substances likely to be present. Chemical analysis for non-TPH constituents also may be determined case by case based on knowledge of the historical source materials and landfill requirements.

A letter and/or completed waste profile questionnaire (WPQ) will be sent to the landfill to arrange for the disposal of PCS. The letter will include:

- the name of the owner and the locations of the material;
- the characteristics of the soil, including analytical results;
- the name of the intended transporter of the material;
- the quantity to be shipped from the Project area to the landfill; and
- the billing arrangement for all fees for landfilling the material.

Further information needed in the letter may be determined at the time of disposal. The landfill operator may require additional information on the nature and concentration of TPH constituents. When preparing to ship PCS, the OER will call the landfill to verify the schedule and confirm that the landfill expects the delivery. Similar notification and waste designation documentation are required if PCS will be incorporated in concrete or asphalt mixtures.

3.15.2 Disposal of Designated Hazardous/Dangerous Waste—Contaminated Soil

For the treatment or disposal of a designated hazardous or dangerous waste at a TSDF, the steps below will be followed for compliance with TSDF and regulatory requirements:

- The owner (as the hazardous/dangerous waste generator) and the OER will designate the waste as specified in WAC 173-303-070. Designation may require laboratory analysis if sufficient generator knowledge is not available.
- The generator (owner) will complete a WPQ provided by the TSDF.
- The owner will obtain an EPA Identification Number (EIN) from Ecology (if not already obtained).
- An EPA-licensed transporter who complies with Ecology's Dangerous Waste Regulations will be contracted to transport the waste to the TSDF. The owner will complete and sign a uniform hazardous waste manifest (manifest). Transporter contract arrangements will be coordinated through the owner.
- The receiving TSDF will return a signed copy of the manifest to the generator (owner) within 35 days of the waste shipment leaving the Project area.
- If the generator (owner) does not receive the signed manifest within 35 days, the generator will formally ask the TSDF how the material was disposed and document the inquiry.
- If the generator does not receive the signed manifest within 45 days, the generator will submit an exception report to Ecology.

3.16 VERIFICATION SAMPLING AND ANALYSIS

For areas where soil known to have been impacted has been removed by excavation and the remaining underlying soil is expected to be clean, the OER may collect verification samples, as needed. Analysis of these samples is necessary to determine the appropriate off-site disposition of the remaining clean material. Soil will be collected as discrete or composite (five-point) samples and analyzed for chemical parameters appropriate for the conditions of the excavation area and Site use history.

3.17 MATERIAL HANDLING

Spoils from excavation or drilling of suspected impacted soil will be temporarily piled and segregated into separate stockpiles by the contractor for further sampling and chemical analysis by the OER to determine disposition options.

Anyone contacting the suspected impacted soil will follow the appropriate site-specific health and safety plan as designated by their employer. If visible dust, particulates, or noticeable odors are present, employees will stop work and determine the appropriate PPE and engineering controls to use.

3.18 DOCUMENTATION AND DISPOSAL

The OER will make initial arrangements for disposition at an off-site facility (e.g., a regional landfill, an approved asphalt/cement plant, or an EPA-permitted TSDF).

The OER will sample the material, arrange for chemical analysis, and complete the necessary documentation for the material to be removed from the Project area and handled in accordance with applicable local, state, and federal regulations.

The lessee and owner will confirm with the off-site facility the schedule, quantity of material to be disposed of, and billing arrangements for all fees related to treatment, recycling, or disposal of the material.

If material is subsequently disposed of as either construction debris or clean fill, the contractor will advise the recipients of the material's contents.

All chemical analytical results for sampled materials will be made available to the responsible parties indicated in Table 2.

References

1. GeoEngineers, 2010. Upland Source and Groundwater Investigation Data Report. Dated 24 March.

2. GeoEngineers, 2014. Remedial Investigation/Feasibility Study (RI/FS) Work Plan. Dated 16 October.

3. GeoEngineers, 2015. Draft Interim Action Work Plan. Dated 14 August.

4. GeoEngineers, 2018. Upland Area Remedial Investigation Data Report Technical Memorandum. Dated 19 March.

5. GeoEngineers, 2019. Work Plan Addendum No. 6. Dated 1 October.

6. GeoEngineers, 2021. Tier 1 Upland Area Soil Investigation Data Report Technical Memorandum and Proposed Additional Soil and Groundwater Sampling and Analysis. Dated 7 December.

7. Haley & Aldrich, Inc., 2022. Draft Geotechnical Assessment. Dated 1 November.

8. Washington State Department of Ecology, 2016. Guidance for Remediation of Petroleum-Contaminated Soil, Toxics Cleanup Program, Publication No. 10-09-057, Revised June 2016.

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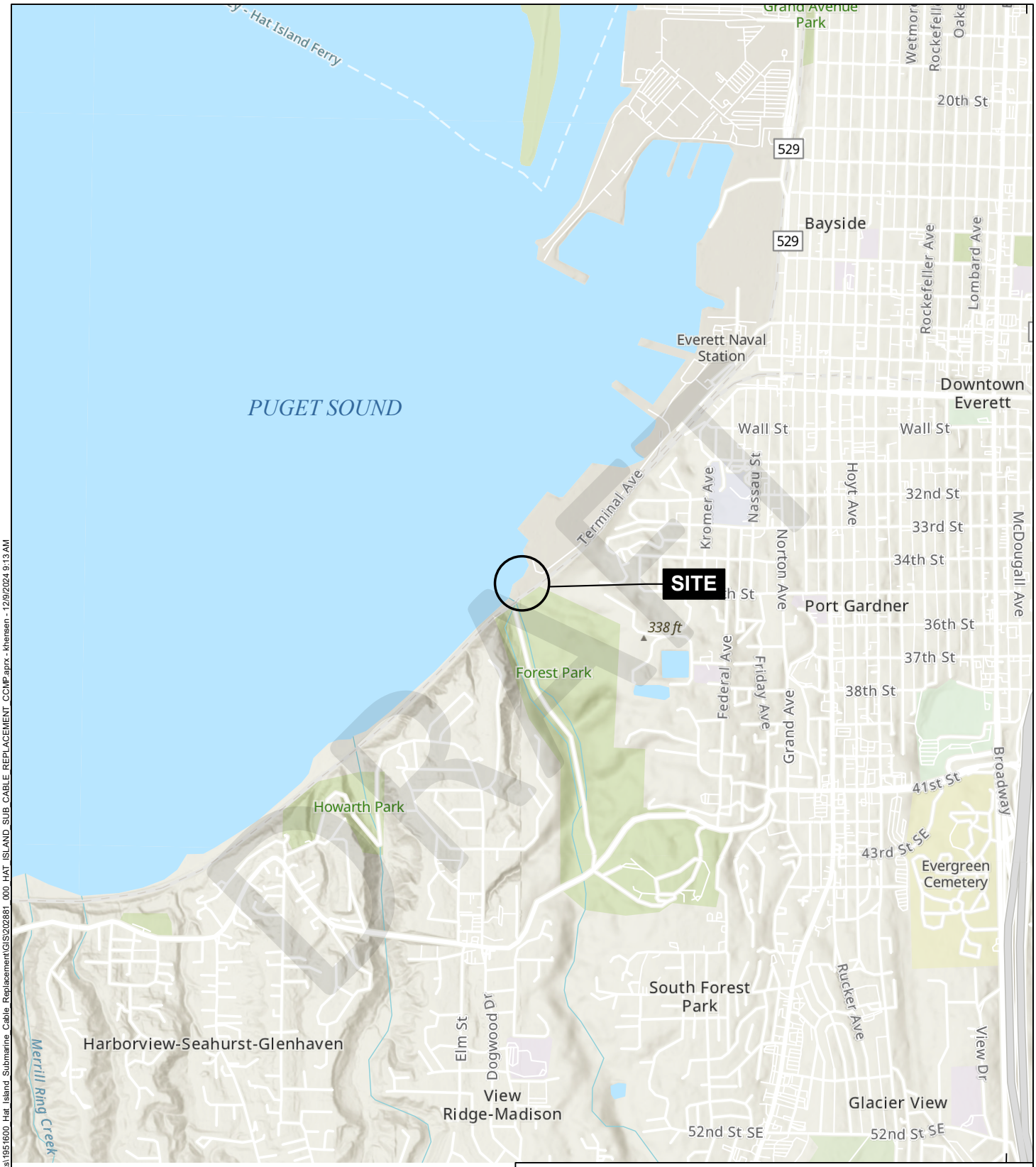
FIGURES



MAP SOURCE: ESRI
SITE COORDINATES: 47°58'17"N, 122°13'47"W

HALEY ALDRICH

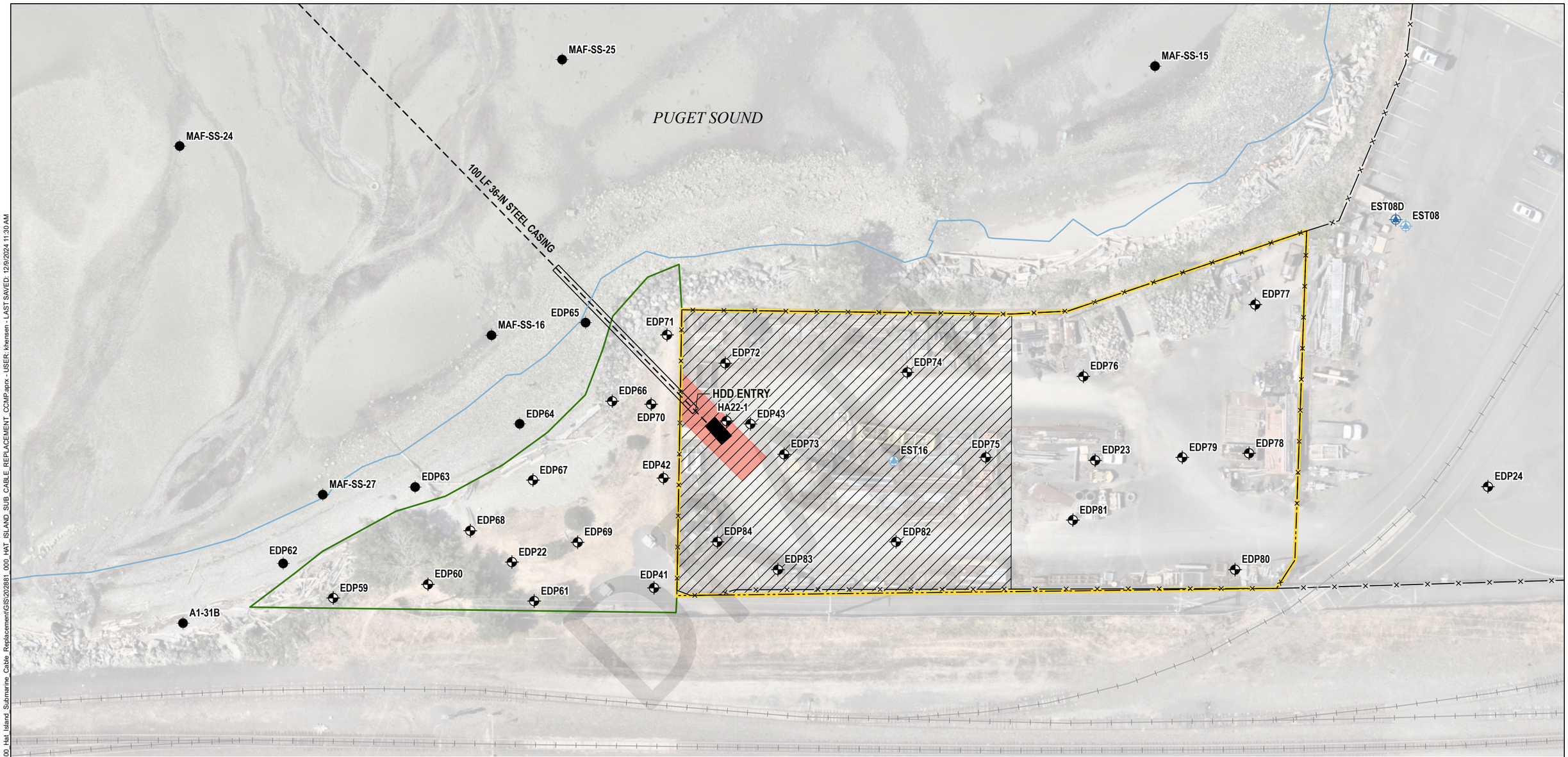
HAT ISLAND SUBMARINE CABLE REPLACEMENT
EQUIPMENT STORAGE / OPEN SPACE AREA
EVERETT, WASHINGTON

PROJECT LOCUS

APPROXIMATE SCALE: 1 IN = 8000 FT
DECEMBER 2024

FIGURE 1

GIS: \\haleyaldrich.com\share\sea_projects\Notebooks\195160O_Hat_Island_Submarine_Cable_Replacement\GIS\202881_000_HAT_ISLAND_SUB_CABLE_REPLACEMENT_CCMP.aprx - khensen - 12/9/2024 9:13 AM



LEGEND

- SEDIMENT SAMPLE
- SOIL BORING
- SHALLOW MONITORING WELL
- DEEP MONITORING WELL
- CHAIN LINK FENCE
- RAILROAD
- PROPOSED HDD SUB-SEA CABLE ALIGNMENT
- TIDAL MEAN HIGHER HIGH WATER (MHHW)
- PROPOSED POWER VAULT
- PROPOSED AREA OF EXCAVATION
- GRAVEL PAVED WORKING SURFACE
- OPEN SPACE
- EQUIPMENT STORAGE AREA (BONEYARD)

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. BASE DATA SOURCE: "EQUIPMENT STORAGE/OPEN SPACE AREA", GEOMATICS, 11 JULY 2022
3. AERIAL IMAGERY SOURCE: NEARMAP, 26 JULY 2024

0 50 100
SCALE IN FEET

HALEY ALDRICH

HAT ISLAND SUBMARINE CABLE REPLACEMENT
EQUIPMENT STORAGE / OPEN SPACE AREA
EVERETT, WASHINGTON

SITE FEATURES AND EXPLORATION LOCATIONS

DECEMBER 2024

FIGURE 2

GIS FILE PATH: \\haleyaldrich.com\share\sea_projects\Notebooks\195\1600_Hat_Island_Submarine_Cable_Replacement\GIS\202881_000_HAT_ISLAND_SUB_CABLE_REPLACEMENT_COMP.aprx - USER: khansen - LAST SAVED: 12/9/2024 11:30 AM

ATTACHMENT 1
Notification Form for Discovery of Suspected or Known Impacts

NOTIFICATION FORM

This record documents information, actions, and notification related to the discovery of and response to the presence of suspected or known hazardous substances at the Site.

Event/Incident

Date _____
Time _____

Person Completing Form

Name _____
Phone Number _____

Description of Condition

_____
_____
_____

Person Discovering Condition

Name _____
Phone Number _____

Action Taken

_____
_____
_____

Notifications

1 _____
2 _____
3 _____
4 _____
5 _____

Stockpile Information

ID Number	Description	Approximate Volume	Samples	Tests	Disposition

ATTACHMENT 2
Washington State Department of Ecology
UST Closure Notification Form
City of Everett Fire Department Permit Instructions

WASHINGTON STATE DEPARTMENT OF ECOLOGY

UNDERGROUND STORAGE TANK
Closure and Site Assessment Notice

See back of form for instructions

FOR OFFICE USE ONLY
Site ID #:_____
Facility Site ID #: _____

Please ✓ the appropriate box(es)
❑ Temporary Tank Closure ❑ Change-In-Service ❑ Permanent Tank Closure ❑ Site Check/Site Assessment

Site Information

Site ID Number _____
(Available from Ecology if the tanks are registered)
Site/Business Name _____
Street
Site Address _____
City/State _____
Zip Code _____ Telephone (___) _____

Owner Information

UST Owner/Operator _____
Mailing Address _____
Street
_____
P.O. Box
City/State _____
Zip Code _____ Telephone (___) _____

Owners Signature_____

Tank Closure/Change-In-Service Company

Service Company _____
Certified Supervisor _____ Decommissioning Certification No. _____
Supervisor's Signature _____ Date _____
Address _____
Street P.O. Box
_____ Telephone (___) _____
City State Zip Code

Site Check/Site Assessor

Certified Site Assessor _____
Address _____
Street P.O. Box
_____ Telephone (___) _____
City State Zip Code

Tank Information

Tank ID	Closure Date	Closure Method	Tank Capacity	Substance Stored

Contamination Present at the Time of Closure

☐ Yes ☐ No ☐ Unknown
Check unknown if no obvious contamination was observed and sample results have not yet been received from analytical lab.

☐ Yes ☐ No
If contamination is present, has the release been reported to the appropriate regional office?

To receive this document in an alternative format, contact the Toxics Cleanup Program at 360-407-7170 (voice) or 1-800-833-6388 OR 711 (TTY)

Instructions

Please Read Carefully

AFTER COMPLETING THIS FORM, RETURN TO:

TOXICS CLEANUP PROGRAM
DEPARTMENT OF ECOLOGY
P.O. BOX 47655
OLYMPIA, WA 98504-7655

This form is to be completed by the tank owner and submitted to Ecology within 30 days of tank closure. Mark the appropriate box(es) for temporary tank closure, permanent tank closure, change-in-service, or site assessment.

Permanent Closure and Change-In-Service require a site assessment be performed.

Site and Owner Information

Fill in the site and owner information. Include the Ecology site number, if known; also, be sure to provide telephone numbers so that any problems can be resolved quickly. **The tank owner MUST sign this form.**

Tank Closure/Change-In-Service Company and Site Check/Site Assessor

List the closure company and fill in the site assessor information for permanent closure or change-in-service. Ask to see the closure company supervisor's ICC Certification and make sure that the certified supervisor signs this form.

Please note: Individuals performing services MUST be certified by the International Code Council (ICC), or other nationally recognized association by which they demonstrate appropriate knowledge pertaining to USTs or have passed another qualifying exam approved by the Department.

Tank Information and Contamination Present at Time of Closure

Please fill in the tank information requested using tank ID numbers previously reported to Ecology. In the column entitled "Closure Method," indicate what manner of closure was used, such as closure in place or removal. Check the appropriate box(es) indicating if contamination is present and has been reported. Contamination found or suspected at the site must be reported to the appropriate Ecology regional office within 24 hours [see below for telephone numbers]. **If contamination is confirmed, a site characterization report must be submitted to the regional office within 90 days; if contamination is not confirmed, then this form, a site assessment checklist, and a site assessment report must be submitted to the above address within 30 days.**

Central	Eastern	Southwest	Northwest
(509) 575-2490	(509) 329-3400	(360) 407-6300	(425) 649-7000

The following tanks are exempt from notification requirements:

- Farm or residential tanks, 1,100 gallons or less, used to store motor fuel for personal or farm use only. The fuel must not be for resale or used for business purposes.
- Tanks used for storing heating oil that is used on the premises where the tank is located.
- Tanks with a capacity of 110 gallons or less.
- Equipment or machinery tanks such as hydraulic lifts or electrical equipment tanks.
- Emergency overflow tanks, catch basins, or sumps.

For more information, call toll free in the state of Washington 1-800-826-7716 (Message).

CITY OF EVERETT
Permit Services

TANK PERMIT – SUBMITTAL CHECKLIST & REQUIREMENTS

INSTRUCTIONS:

1. Refer to the 'Required Documents by Permit Subtype' table below for the required documents categorized by permit subtype. Please note that the required documents listed below are specific to the tank permit. Additional permits may be required for the overall project, which may require additional submittal documents.
2. See the 'Document Type Information & Requirements' section below for definitions and required details about each of the listed documents. Follow these requirements when preparing your plans to help expedite your permit review. Failure to comply with the requirements of each document type may result in an incomplete application or extensive corrections, lengthening permit review times.

REQUIRED DOCUMENTS BY PERMIT SUBTYPE:

SUBTYPE	REQUIRED DOCUMENTS
DECOMMISSIONING RESIDENTIAL HEATING OIL TANK	• Site Plan • Disposal Plan (if removing tank) • Decommissioning plan (if decommissioning in place) • Hot Work Plan (if cutting tank apart) • Cubic Yards of Fill (if removing tank)
DECOMMISSIONING COMMERCIAL TANK (ABOVE OR BELOW)	• Site Plan • Disposal Plan (if removing tank) • Decommissioning plan (if decommissioning in place) • Hot Work Plan (if cutting tank apart) • Cubic Yards of Fill (if removing tank)
NEW BELOW GROUND TANK (RESIDENTIAL PROPERTY)	• Site Plan • Material Safety Data Sheets • Manufacturers Specifications on the tank(s) and other equipment
NEW BELOW GROUND TANK (COMMERCIAL PROPERTY)	• Site Plan • Material Safety Data Sheets • Manufacturers Specifications on the tank(s) and other equipment
NEW ABOVE GROUND TANK (RESIDENTIAL PROPERTY)	• Site Plan • Material Safety Data Sheets • Manufacturers Specifications on the tank(s) and other equipment
NEW ABOVE GROUND TANK (COMMERCIAL PROPERTY)	• Site Plan • Material Safety Data Sheets • Manufacturers Specifications on the tank(s) and other equipment

DOCUMENT TYPE INFORMATION & REQUIREMENTS:

Requirements for each type of document are listed below. Please follow the requirements outlined below when preparing each document for submittal to help expedite your permit reviews. Failure to comply with the requirements of each document type may result in an incomplete application or extensive corrections, lengthening permit review times. Prepare all documents following the Permit document upload standards & instructions (PDF).

DOCUMENT TYPES:

- **Site Plan:** An aerial or map view of the property showing (Can use MapEverett or another map viewer):
  - Location of property lines
  - Location of Buildings on the property
  - Tank location (either install location or X it out/label it to be removed)
  - Identify the limits of construction
  - List cubic yards of fill (if applicable) and show on the plans where the fill will be placed and any temporary storage/stockpiling that is to occur.

- **Disposal Plan**: Required by the Fire Department if removing the tank. Contact the Fire Marshal's office if you have questions about this document at fmo@everettwa.gov.
- **Decommissioning Plan:** Required by the Fire Department if decommissioning in place. Appropriate backfill must be used. Contact the Fire Marshal's office if you have questions about this document at fmo@everettwa.gov.
- **Hot Work Plan:** Required by the Fire Department if cutting the tank apart in order to remove it. Contact the Fire Marshal's office if you have questions about this document at fmo@everettwa.gov.
- **Cubic Yards of Fill:** List on the plans as part of your tank removal plan how much fill (in cubic yards) will be imported to backfill the hole from the tank removal. You can add this to the permit's additional notes field as well.
- **Additional information:**
  - No Fuel Dispensers are permitted by City of Everett. Contact EPA & Department of Ecology.
  - Septic Tank removals are handled by Snohomish Health District.
- **Applicable Construction Codes:** See the current Construction Codes and References list.

CITY OF EVERETT
Permit Services

PERMIT DOCUMENT UPLOAD STANDARDS & INSTRUCTIONS

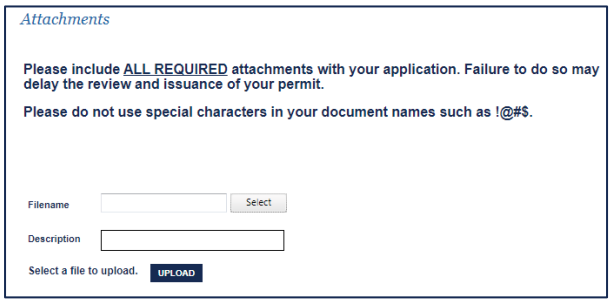
UPLOAD STANDARDS & REQUIREMENTS:

- All files uploaded must be in Portable Document Format (PDF).
- Must upload one PDF for each document type (i.e., upload plan set and drainage report as two separate PDFs).
- Each separate document must be one compiled PDF (i.e., upload plan set instead of separate drawing sheets).
- The Online Permitting Portal's upload limit is 2GB per upload.
- Orient all sheets so the top of the page is always at the top of the computer screen (right side up).
- All sheets must be numbered, labeled, and/or titled. Use title blocks on larger plan sets.
- Ensure all layers are flattened in the authoring program prior to export and submittal. Scanned documents are inherently flattened.
    - **IMPORTANT NOTE**: Items with digital signatures that are un-flattened do not allow City approval stamps or other markups to be added and will be considered an incomplete submittal delaying your permit review.
- Naming convention of the document must be as follows:
    - **Initial Submittals:** 1stReview_DocumentType_MM.DD.YYYY (i.e. 1stReview_BuildingPlans_08.01.2023)
    - **Re-Submittals:** Re-Review_DocumentType_MM.DD.YYYY (i.e. 2ndReview_StructuralCalcs_08.01.2023)

UPLOAD INSTRUCTIONS & TIPS: (Need help logging in and applying? Click here for a step-by-step guide)

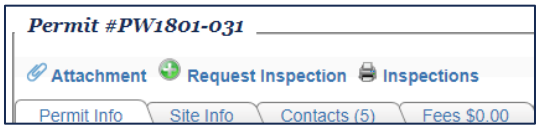
- **FOR NEW PERMIT APPLICATIONS:** Within the online permitting portal permit application at the Attachments section,
    1. Click the Select button next to Filename to choose files.
    2. In the Description box, name the document with the required naming convention above.
    3. Click the UPLOAD button.

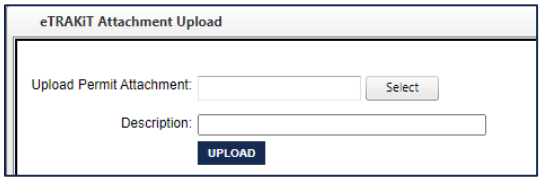
    Tips: If you have issues with upload speeds timing out, select one document at a time to upload.



    - If necessary, the required documents can be uploaded as soon as the permit application is submitted and appears on your dashboard. See resubmittal upload instructions below for this option.
    - If your documents are unable to upload after following the above tips, please contact PermitServices@everettwa.gov with the permit # and request an ftp link to upload your documents.

- **FOR RE-SUBMITTALS & UPLOADS AFTER PERMIT APPLICATION SUBMISSION:** From your online permitting portal dashboard, click on the permit number to get into the subject permit.
    1. Click on the Attachments link (paperclip symbol).
    2. Click the Select button next to Upload Permit Attachment.
    3. In the Description box, name the document with the required naming convention above.
    4. Click the UPLOAD button.
    5. Fill out and submit a Transmittal Sheet to PermitServices@everettwa.gov. **This step is critical. Failure to do so will delay your permit review, as the online permitting portal does not notify staff when documents are uploaded.**





3200 Cedar Street
Everett, WA 98201

425.257.8810
8am-12pm, 1pm-3pm

PermitServices@everettwa.gov
everettwa.gov/permits

ATTACHMENT 3
Example Waste Management and Disposal Request Letter

EXAMPLE WASTE MANAGEMENT DISPOSAL REQUEST LETTER

[Date]

Waste Management Subcontractor
[Address]

Attn: Special Waste Disposal Coordinator

Re: Request for Disposal Clearance for Petroleum-Contaminated Soil

HAT ISLAND SUBMARINE CABLE REPLACEMENT
EVERETT, WASHINGTON

Dear _____:

On behalf of PORT OF EVERETT, I request a memorandum of clearance for disposal of petroleum-contaminated soil (PCS).

Soil from the excavation of the above-referenced project was removed from _____ [*example: around a former underground fuel storage tank*]. The contamination in the soil is similar to _____ [*example: heavy diesel fuel].*

Disposal at the _____ Landfill is intended. I have enclosed preliminary chemical analysis reports from _____ Laboratory that indicate the PCS does not exceed the landfill's maximum allowable limits. These results are for a composite sample of the stockpiled material from the excavation. The quantity of material for disposal is not expected to exceed _____ tons. The material will be hauled by _____ *[hauling contractor*] sometime from _____ to _____.

Because the schedule for site development depends on removal of this soil, your quick consideration of this request would be appreciated.

If you have any questions, please feel free to call me at _____.

Sincerely,

HALEY & ALDRICH, INC.

ATTACHMENT 4
Waste Profile Documentation

WASTE MANAGEMENT

EZ Profile™

Requested Facility: _____ ❑ Unsure Profile Number: _____

❑ Multiple Generator Locations (Attach Locations) ❑ Request Certificate of Disposal ❑ Renewal? Original Profile Number: _____

A. GENERATOR INFORMATION (MATERIAL ORIGIN)

1. Generator Name: _____
2. Site Address: _____
   (City, State, ZIP) _____
3. County: _____
4. Contact Name: _____
5. Email: _____
6. Phone: _____ 7. Fax: _____
8. Generator EPA ID: _____ ❑ N/A
9. State ID: _____ ❑ N/A

B. BILLING INFORMATION ❑ SAME AS GENERATOR

1. Billing Name: _____
2. Billing Address: _____
   (City, State, ZIP) _____
3. Contact Name: _____
4. Email: _____
5. Phone: _____ 6. Fax: _____
7. WM Hauled? ❑ Yes ❑ No
8. P.O. Number: _____
9. Payment Method: ❑ Credit Account ❑ Cash ❑ Credit Card

C. MATERIAL INFORMATION

1. Common Name: _____
   Describe Process Generating Material: ❑ See Attached

2. Material Composition and Contaminants: ❑ See Attached

1.	
2.	
3.	
4.	
Total comp. must be equal to or greater than 100%	≥100%

3. State Waste Codes: _____ ❑ N/A
4. Color: _____
5. Physical State at 70˚F: ❑ Solid ❑ Liquid ❑ Other: _____
6. Free Liquid Range Percentage: _____ to _____ ❑ N/A
7. pH: _____ to _____ ❑ N/A
8. Strong Odor: ❑ Yes ❑ No Describe: _____
9. Flash Point: ❑ <140˚F ❑ 140˚–199˚F ❑ ≥200˚ ❑ N/A

D. REGULATORY INFORMATION

1. EPA Hazardous Waste? ❑ Yes* ❑ No
   Code: _____
2. State Hazardous Waste? ❑ Yes ❑ No
   Code: _____
3. Is this material non-hazardous due to Treatment, Delisting, or an Exclusion? ❑ Yes* ❑ No
4. Contains Underlying Hazardous Constituents? ❑ Yes* ❑ No
5. From an industry regulated under Benzene NESHAP? ❑ Yes* ❑ No
6. Facility remediation subject to 40 CFR 63 GGGGG? ❑ Yes* ❑ No
7. CERCLA or State-mandated clean-up? ❑ Yes* ❑ No
8. NRC or State-regulated radioactive or NORM waste? ❑ Yes* ❑ No

***If Yes, see Addendum (page 2) for additional questions and space.**

9. Contains PCBs? → If Yes, answer a, b and c. ❑ Yes ❑ No
   a. Regulated by 40 CFR 761? ❑ Yes ❑ No
   b. Remediation under 40 CFR 761.61 (a)? ❑ Yes ❑ No
   c. Were PCB imported into the US? ❑ Yes ❑ No
10. Regulated and/or Untreated Medical/Infectious Waste? ❑ Yes ❑ No
11. Contains Asbestos? ❑ Yes ❑ No
    → If Yes: ❑ Non-Friable ❑ Non-Friable – Regulated ❑ Friable

E. ANALYTICAL AND OTHER REPRESENTATIVE INFORMATION

1. Analytical attached ❑ Yes
   Please identify applicable samples and/or lab reports:

2. Other information attached (such as MSDS)? ❑ Yes

F. SHIPPING AND DOT INFORMATION

1. ❑ One-Time Event ❑ Repeat Event/Ongoing Business
2. Estimated Quantity/Unit of Measure: _____
   ❑ Tons ❑ Yards ❑ Drums ❑ Gallons ❑ Other: _____
3. Container Type and Size: _____
4. USDOT Proper Shipping Name: ❑ N/A
   _____

G. GENERATOR CERTIFICATION (PLEASE READ AND CERTIFY BY SIGNATURE)

By signing this EZ Profile™ form, I hereby certify that all information submitted in this and all attached documents contain true and accurate descriptions of this material, and that all relevant information necessary for proper material characterization and to identify known and suspected hazards has been provided. Any analytical data attached was derived from a sample that is representative as defined in 40 CFR 261 – Appendix 1 or by using an equivalent method. All changes occurring in the character of the material (i.e., changes in the process or new analytical) will be identified by the Generator and be disclosed to Waste Management prior to providing the material to Waste Management.

If I am an agent signing on behalf of the Generator, I have confirmed with the Generator that information contained in this Profile is accurate and complete.

Name (Print): _____ Date: _____

Title: _____

Company: _____

Certification Signature

Revised June 30, 2015

EZ Profile™ Addendum

Only complete this Addendum if prompted by responses on EZ Profile™ (page 1) or to provide additional information. Sections and question numbers correspond to EZ Profile™.

Profile Number: _____

C. MATERIAL INFORMATION

Describe Process Generating Material (Continued from page 1): If more space is needed, please attach additional pages.

Material Composition and Contaminants (Continued from page 1): If more space is needed, please attach additional pages.

5.	
6.	
7.	
8.	
9.	
Total composition must be equal to or greater than 100%	≥100%

D. REGULATORY INFORMATION

Only questions with a "Yes" response in Section D on the EZ Profile™ form (page 1) need to be answered here.

1. EPA Hazardous Waste
   a. Please list all USEPA listed and characteristic waste code numbers:

   b. Is the material subject to the Alternative Debris standards (40 CFR 268.45)? ❑ Yes ❑ No
   c. Is the material subject to the Alternative Soil standards (40 CFR 268.49)? → If Yes, complete question 4. ❑ Yes ❑ No
   d. Is the material exempt from Subpart CC Controls (40 CFR 264.1083)? ❑ Yes ❑ No
      → If Yes, please check **one** of the following:
      ❑ Waste meets LDR or treatment exemptions for organics (40 CFR 264.1082(c)(2) or (c)(4))
      ❑ Waste contains VOCs that average <500 ppmw (CFR 264.1082(c)(1)) – will require annual update.
2. State Hazardous Waste → Please list all state waste codes: _____
3. For material that is Treated, Delisted, or Excluded → Please indicate the category, below:
   ❑ Delisted Hazardous Waste ❑ Excluded Waste under 40 CFR 261.4 → Specify Exclusion: _____
   ❑ Treated Hazardous Waste Debris ❑ Treated Characteristic Hazardous Waste → If checked, complete question 4.
4. Underlying Hazardous Constituents → Please list all Underlying Hazardous Constituents:

5. Industries regulated under Benzene NESHAP include petroleum refineries, chemical manufacturing plants, coke by-product recovery plants, and TSDFs.
   a. Are you a TSDF? → If yes, please complete Benzene NESHAP questionnaire. If not, continue. ❑ Yes ❑ No
   b. Does this material contain benzene? ❑ Yes ❑ No
      1. If yes, what is the flow weighted average concentration? _____ ppmw
   c. What is your facility's current total annual benzene quantity in Megagrams? ❑ <1 Mg ❑ 1–9.99 Mg ❑ ≥10 Mg
   d. Is this waste soil from a remediation? ❑ Yes ❑ No
      1. If yes, what is the benzene concentration in remediation waste? _____ ppmw
   e. Does the waste contain >10% water/moisture? ❑ Yes ❑ No
   f. Has material been treated to remove 99% of the benzene or to achieve <10 ppmw? ❑ Yes ❑ No
   g. Is material exempt from controls in accordance with 40 CFR 61.342? ❑ Yes ❑ No
      → If yes, specify exemption: _____
   h. Based on your knowledge of your waste and the BWON regulations, do you believe that this waste stream is subject to treatment and control requirements at an off-site TSDF? ❑ Yes ❑ No
6. 40 CFR 63 GGGGG → Does the material contain <500 ppmw VOHAPs at the point of determination? ❑ Yes ❑ No
7. CERCLA or State-Mandated clean up → Please submit the Record of Decision or other documentation with process information to assist others in the evaluation for proper disposal. A "Determination of Acceptability" may be needed for CERCLA wastes not going to a CERCLA approved facility.
8. NRC or state regulated radioactive or NORM Waste → Please identify Isotopes and pCi/g: _____

Revised June 30, 2015

WASTE MANAGEMENT

Additional Profile Information

Profile Number: _____

C. MATERIAL INFORMATION

Material Composition and Contaminants (Continued from page 2): If more space is needed, please attach additional pages.

10.	
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32.	
33.	
34.	
35.	
36.	
37.	
38.	
39.	
40.	
Total composition must be equal to or greater than 100%	≥100%

D. REGULATORY INFORMATION

1. EPA Hazardous Waste
   a. Please list all USEPA listed and characteristic waste code numbers (Continued from page 2):

Revised June 30, 2015

Maximum Allowable Levels

PARAMETER	WASTE CODE	MAX. ALLOWABLE LEVELS		ANALYTICAL METHODS
		TCLP (mg/L)	TOTAL (mg/kg)	
TCLP METALS				
Arsenic	D004	<5.0	100	SW-846-1311/SW-846-6010
Barium	D005	<100.00	2000	SW-846-1311/SW-846-6010
Cadmium	D006	<1.0	20	SW-846-1311/SW-846-6010
Chromium	D007	<5.0	100	SW-846-1311/SW-846-6010
Lead	D008	<5.0	100	SW-846-1311/SW-846-6010
Mercury	D009	<0.2	4	SW-846-1311/SW-846-7470
Selenium	D010	<1.0	20	SW-846-1311/SW-846-7740
Silver	D011	<5.0	100	SW-846-1311/SW-846-6010
TCLP VOLATILES				
Benzene	D018	<0.5	10	SW-846-1311/SW-846-8260
Carbon Tetrachloride	D019	<0.5	10	SW-846-1311/SW-846-8260
Chlorobenzene	D021	<100.0	2000	SW-846-1311/SW-846-8260
Chloroform	D022	<6.0	120	SW-846-1311/SW-846-8260
1,2-Dichloroethane	D028	<0.5	10	SW-846-1311/SW-846-8260
1,1-Dichloroethylene	D029	<0.7	14	SW-846-1311/SW-846-8260
Methyl Ethyl Ketone	D035	<200.0	4000	SW-846-1311/SW-846-8260
Tetrachloroethylene	D039	<0.7	14	SW-846-1311/SW-846-8260
Trichloroethylene	D040	<0.5	10	SW-846-1311/SW-846-8260
Vinyl Chloride	D043	<0.2	4	SW-846-1311/SW-846-8260

TCLP SEMI-VOLATILES (Base Neutrals)				
1,4 Dichlorobenzene	D027	<7.5	150	SW-846-1311/SW-846-8270
Hexachlorobenzene	D032	<0.13	2.6	SW-846-1311/SW-846-8270
Hexachlorobutadiene	D033	<0.5	10	SW-846-1311/SW-846-8270
Hexachloroethane	D034	<3.0	60	SW-846-1311/SW-846-8270
Nitrobenzene	D036	<2.0	40	SW-846-1311/SW-846-8270
Pyridine	D038	<5.0	100	SW-846-1311/SW-846-8270
2,4-Dinitrotoluene	D030	<0.13	2.6	SW-846-1311/SW-846-8270
TCLP SEMI-VOLATILES (Acid Compounds)				
o-Cresol	D023	<200.0	4000	SW-846-1311/SW-846-8270
m-Cresol	D024	<200.0	4000	SW-846-1311/SW-846-8270
p-Cresol	D025	<200.0	4000	SW-846-1311/SW-846-8270
Cresol, Total	D026	<200.0	4000	SW-846-1311/SW-846-8270
Pentachlorophenol	D037	<100.0	2000	SW-846-1311/SW-846-8270
2,4,5-Trichlorophenol	D041	<400.0	8000	SW-846-1311/SW-846-8270
2,4,6-Trichlorophenol	D042	<2.0	40	SW-846-1311/SW-846-8270
TCLP HERBICIDES				
2,4-D	D016	<10.0	200	SW-846-1311/SW-846-8080
2,4,5-TP (Silvex)	D017	<1.0	20	SW-846-1311/SW-846-8080
TCLP PESTICIDES				
Chlorodane	D020	<0.03	0.6	SW-846-1311/SW-846-8080
Endrin	D012	<0.02	0.4	SW-846-1311/SW-846-8080
Heptachlor	D031	<0.008	0.16	SW-846-1311/SW-846-8080
Lindane	D013	<0.4	8	SW-846-1311/SW-846-8080

Methyoxychlor	D014	<10.0	200	SW-846-1311/SW-846-8080
Toxaphene	D015	<0.5	10	SW-846-1311/SW-846/8080
GENERAL				
pH	D002	2.0 < x <12.5		SW-846-9045
Ignitability (Liquids Only)	D001	>140o F (60o C)		SW-846-C7
Free Liquids		NO FREE LIQUIDS (Pass)		SW-846-9095
PCB's		<50 mg/kg or ppm		SW-846-8080
TPH		Varies by landfill		SW-846-8015, EPA 418.1 API-(GC/FID), ASTM-D3987-85/SW-846-9070