Lower Duwamish Waterway Group

Port of Seattle / City of Seattle / King County / The Boeing Company

Date: July 24, 2014

To: Allison Hiltner, EPA and Ron Timm, Ecology

From: Lower Duwamish Waterway Group

Subject: Candidate Plot Locations for Enhanced Natural Recovery-Activated Carbon Pilot Study

This memorandum provides key tables, figures, and summary documentation of the methods and criteria used to identify potential candidate plot locations for the Enhanced Natural Recovery (ENR)-Activated Carbon (AC) Pilot Study. Candidate plots identified through this process will be sampled for polychlorinated biphenyl (PCB) aroclors later this year. Final plot locations will be selected from the candidate plots in collaboration between the Lower Duwamish Waterway Group (LDWG), the U.S. Environmental Protection Agency (EPA), and the Washington State Department of Ecology (Ecology) after new surface sediment samples have been collected to refine the distribution of PCB concentrations in the candidate plots. The pilot study will evaluate three types of candidate areas, each representing different physical conditions: subtidal, intertidal, and scour mitigation (areas of scour potential identified in the Feasibility Study).

In this memorandum, candidate plot locations were identified in a two-step screening process. First, potential pilot areas were identified that meet all of the following criteria:

- 1) Located in Area of Potential Concern 1 (AOPC 1).
- 2) Located in Recovery Category 2/3 (or in Category 1 area with "light" scour potential considered for the scour mitigation areas).
- 3) Located within EPA's Proposed Plan partial dredge and cap, cap, or ENR footprint.
- 4) Contained point-based surface PCB concentration data greater than the sediment quality standards (SQS) and less than the cleanup screening level (CSL).

Areas that meet these first criteria are identified with a green hatch pattern on Figures 1 through 3, using GIS shape files from the *Lower Duwamish Waterway Final Feasibility Study* (AECOM 2012).

Areas were also identified that meet the criteria above except they: 1) contained PCB concentration data greater than the CSL but less than two times the CSL and 2) were located within EPA's Proposed Plan dredge, partial dredge and cap, cap, or ENR footprint. Areas that meet the first two criteria above and these last two criteria are identified with a red hatch pattern on Figures 1 through 3. This extended group was developed because current PCB concentrations may be less than the estimated SWAC (which is based on data from the Feasibility Study).

From this group of potential areas, candidate plots were selected based on consideration of the following conditions¹:

- **Area**: Each location should accommodate approximately two ½-acre plots, ideally located in similar water depths to avoid steep slopes and changes in the physical conditions (i.e., intertidal vs. subtidal).
- **Ownership**: Plots should be in the waterway with no in-water ownership by a private party to facilitate plot access.
- **Sedimentation**: Preference was given to locations with a modeled net sedimentation rate (NSR) of greater than 1 cm/year in subtidal areas and greater than 0.5 cm/year in intertidal areas to minimize erosion potential.
- **PCB Concentration:** As a general indicator of PCB concentrations, the SWAC for a 1-acre area is greater than the SQS.
- **Berthing Area:** For Category 1 areas considered for scour mitigation plots, sites with very active berthing areas that require maintained navigation depths were not preferred.
- **In-water Structures**: Locations where the majority of the test plot would be covered by an in-water structure were excluded for ease of material placement for the pilot study.
- **Technology and Shoaling**: If technology assignments were based on shoaling in the navigation channel or berthing areas, then the orientation of the plot was adjusted based on bathymetry to avoid those areas. EPA's Proposed Plan technology assignments within each candidate plot are listed in Table 1.
- **Recontamination Potential**: Sites with a greater potential for recontamination were generally avoided (based on FS Appendix J, Figure J-9a).

¹ Two areas with elevated contaminant concentrations were excluded from this analysis: 1) Industrial Containers/Trotsky/NW Cooperage and 2) Glacier Northwest/Reichhold.



A total of 13 candidate plot areas were identified. For each plot category (subtidal, intertidal, and scour mitigation), at least three candidate plots were identified. Physical and chemical conditions for each candidate plot are summarized in Tables 1 and 2, respectively.

Figures 1 through 3 show the candidate plot locations, with information listed for each one detailing concentrations of PCBs, cPAHs, dioxin/furans, number of chemicals exceeding SQS (not including PCBs), and the NSR. The average PCB, cPAH, and dioxin/furan data presented were calculated using all available data from the Feasibility Study². SWACs were calculated for the entire 1 acre shown (i.e., the SWAC for both test plots combined). The left panel provides supporting conceptual site model information and EPA Proposed Plan technology assignments and the right panel of each figure identifies the candidate plot areas.

In addition, the geometry of the candidate plots was adjusted, where possible, to include the entire remedial action planned for that footprint (per the EPA Proposed Plan) to minimize future disturbance of the area. A larger dashed outline is shown for each candidate plot, indicating the area needed to actively "remediate" in the vicinity of candidate test plots (based on the EPA Proposed Plan footprints). These footprints vary in size from 0.8 to 4.5 acres.

The locations of the areas in relation to physical constraints used to screen the plots (berthing areas, water depth, etc.) are shown on Figure 4. Aerial photographs showing the approximate extent of the candidate plots are included in Attachment 1. Sun illumination maps based on 2003 bathymetric data are included in Attachment 2 for the three scour mitigation areas. These were used to assess the possible presence of scourrelated and spudding-related features.

Recommended Candidate Plot Locations for Sampling

Two intertidal and two subtidal candidate plot locations are recommended for initial sampling (i.e., collection and PCB analysis of sediment samples) to verify that the correct range of PCB concentrations is present. A third intertidal and a third subtidal location are also recommended as backup locations (where sediment samples will be collected and archived for potential future analysis in the event that sample results indicate the two recommended areas do not have suitable PCB concentrations). Only one scour mitigation site is recommended and two backup sites are identified. In

² SWACs were calculated in GIS using samples from the FS baseline dataset that were located both inside and adjacent to the proposed plots.



summary, LDWG recommends sampling the following areas (shown on Figures 1 through 3):

- Intertidal areas: Area 3, Area 12, backup Area 13;
- Subtidal areas: Area 4, Area 8, backup Area 10; and
- Scour mitigation areas: Area 1 (and potentially Area 6³), backup Areas 2 and 7.

Next Steps

Following receipt and validation of PCB aroclor verification sample data, LDWG will submit the data electronically to EPA/Ecology for review. In addition, a brief report will be prepared and submitted for review. A meeting will be held between LDWG and EPA/Ecology to review the data and determine which of the sampled candidate areas will be used for the full study. These locations will be incorporated into the design report.

Attachments

Table 1 - Summary of Site Conditions for Each Candidate Plot Area

Table 2 – Summary of Existing Sample Data for Each Candidate Plot Area

Figure 1 - Reach 1: Potential ENR/Carbon Pilot Treatment Areas

Figure 2 - Reach 2: Potential ENR/Carbon Pilot Treatment Areas

Figure 3 - Reach 3: Potential ENR/Carbon Pilot Treatment Areas

Figure 4 - Information Used for Candidate Plot Screening

Attachment 1 – Aerial photographs

Attachment 2 - Sun Illumination Maps for Scour Mitigation Areas

³ Although Area 6 is not included in Recovery Category 1 in the EPA Proposed Plan, it may make a suitable scour mitigation plot area given the amount of vessel traffic known to occur in Slip 1.



ENR-AC Pilot Study Plot Selection

Table 1: Summary of Site Conditions for Each Candidate Plot Area

								Physical Features			Plot S	Size	Nearest Outfalls						
Plot Type	Area	Location	Recovery Category	EPA Proposed Plan Assigned Technology	Beach Play	Located in Clamming Area?	Overwater Structure or Pilings Present?	Intertidal Armored Slope?1	Berthing Area?	Elevation in Footprint ²	Modeled Net Sedimentation Rate	Empirical Net Sedimentation Rate ³	Study Plot Area (as Shown on Figures 1 to 3)	Area to Remediate Full Footprint ⁴	Distance to Nearest Outfall ⁵	Outfall ID(s) ⁶	Outfall Status ⁶	Outfall Owner ⁶	Outfall Stormwater or Storm Drain Solids Sampled ⁶ ?
							Yes, widely spaced												
	Area 3	RM 0.6W	Category 3	ENR	No	Yes	piles	No	No	-5 to 3 ft MLLW	1.1 cm/yr	No core available	1 acre	4.5 acres	667 feet downstream	n/a	n/a	n/a	n/a
	Area 5	RM 0.9W	Category 3	ENR	Partial ⁷	Yes	No	No	No	-3 to 8 ft MLLW	0.9 cm/yr	No core available	1 acre	3.7 acres	360 feet upstream	n/a	n/a	n/a	n/a
Areas	Area 9 ⁸	RM 1.3E	Category 1/3	ENR, Cap, Dredge	No	Yes	No	Yes	No	-21 to 5 ft MLLW	2.2 cm/yr	0.9 to 2.6 cm/yr	1 acre	1.1 acres	25 feet downstream of southern plot (located between plots)	2009, 2010	Active	King County - Saint Gobain Containers	No
Intertidal Areas	Area 12	RM 2.6E	Category 3	ENR	No	Yes	No	Yes	No	-14 to 4 ft MLLW	2.7 cm/yr	0.5 to 3.0 cm/yr	1 acre	1.7 acres	0 feet	2040, 2038, 2039	2038, 2039 - Presumed Inactive 2040 - Active	Cleanscapes - Puget Sound Truck Lines (lease)	No
	Area 13	RM 3.9W	Category 2	Dredge	No	Yes	Yes, 1 dolphin/cluster	No	No	-6.9 to 8.8 ft MLLW	2.5 cm/yr	0.5 to 0.9 cm/yr	1 acre	2.7 acres	0 feet	2074, 2075, 2076, 2077	2074, 2076 - Abandoned 2075, 2077 - Active	2077- Boeing 2074, 2075, 2076 - Merrill Creek Holdings	Yes
	Area 4	RM 0.7	Category 3	ENR, Dredge	No	No	No	n/a	No	-35 to -28 ft MLLW	1.1 cm/yr	No core available	1 acre	4.3 acres	165 feet east	n/a	n/a	n/a	n/a
Subtidal Areas	Area 6 ⁹	RM 1.0E	Category 2	ENR, PDC	No	No	No	n/a	No	-28 to -22 ft MLLW	1.7 cm/yr	No core available	0.9 acres	3.6 acres	60 feet north (in Slip 1)	2245, 5000, 5001	Presumed Active	Federal - Federal Center South	No
tida	Area 8	RM 1.2	Category 3	ENR	No	No	No	n/a	No	-36 to -31 ft MLLW	1.2 cm/yr	No core available	1.2 acres	1.2 acres	200 feet west	n/a	n/a	n/a	n/a
Sub	Area 10	RM 1.5	Category 3	ENR, PDC	No	No	No	n/a	No	-37 to -30 ft MLLW	1.7 cm/yr	No core available	1 acre	2.4 acres	250 feet east	n/a	n/a	n/a	n/a
	Area 11	RM 2.1	Category 2/3	ENR	No	No	No	n/a	Yes	-25.5 to -15 ft MLLW	3.0 cm/yr	No core available	0.9 acres	3.7 acres	237 feet upstream	n/a	n/a	n/a	n/a
our Mitigation Areas	Area 1	RM 0.1E	Category 1/2	Cap, Dredge	No	No	Yes, partial overwater structure	n/a	Yes	-32 to -1 ft MLLW	0.5 cm/yr	No rate	1 acre	1.6 acres	85 feet downstream	2154	Active	Port of Seattle - T- 104 Foreign Trade Zone 5	No
Mitigatic	Area 2	RM 0.2E	Category 1	Cap, Dredge	No	No	Yes - partial overwater structure	n/a	Yes	-38 to -14 ft MLLW	0.7 cm/yr	1.1 to 1.7 cm/yr	1 acre	4.2 acres	700 feet downstream	n/a	n/a	n/a	n/a
Scour	Area 7	RM 1.0W	Category 1	PDC	No	No	No	n/a	Yes	-32 to -26 ft MLLW	1.3 cm/yr	2.3 to 4.9 cm/yr	1 acre	0.8 acres	360 feet east (across river)	n/a	n/a	n/a	n/a

Notes

1) Based on Figure 2-29 - Shoreline Conditions from the final Feasibility Study (AECOM 2012).

2) Based on 2007 bathymetric survey.

3) Based on Figure F-2 from Appendix F of the final Feasiblity Study (AECOM 2012).

4) Area based on those shown on Figures 1 through 3 as required to actively remediate a discrete technology assignment footprint per EPA's Proposed Plan.

5) Outfall location is listed relative to the test plot area. For example "667 feet downstream" indicates the nearest outfall is 667 feet downstream from the plot, on the same side of the river. Also "200 feet west" indicates the outfall is located on the bank 200 feet west of the plot.

6) Based on Lower Duwamish Waterway - Outfall Inventory Update, January 2012 - February 2014 by Leidos dated March 2014, downloaded from Ecology website. ID, status, and ownership are only listed for outfalls within 150 feet of the test plot.

7) Area 5 footprint is shown adjacent to and partially within a beach area.

8) Area 9 consists of approximately half subtidal and half intertidal areas.

9) Although Area 6 is not included in Recovery Category 1 in the EPA Proposed Plan, it may make a suitable scour mitigation plot area given the amount of vessel traffic known to occur in Slip 1.

cm/yr - centimeters per year n/a - not applicable
ENR - Enhanced Natural Recovery PDC - Partial Dredge and Cap

MLLW - mean lower low water RM - river mile

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Table 2: Summary of Existing Sample Data for Each Candidate Plot Area

*** **Part 1************************************		Area	Plot Type	PCB Surface Concentrations (0 to 10 cm)										PCB Subsurface Concentrations (0 to 2 ft)				cPAH Su	urface Concentrations (0			
					Location ID	Sample Date	Conc. (µg/kg	Normalized Concentration	TOC (%)	Exeedance		ID (PCB Concentration μg/kg dw)	Sample ID (PCB Concentration μg/kg dw)	PCB cores in	Concentration in Core inside footprint, 0 to 2 ft (µg/kg dw) [mg/kg	Nearest Core (if none present in	Concentration in Nearest Core, 0 to 2 ft (µg/kg dw) [mg/kg	SWAC (µg	Sample ID		Toxicity Test	Other Contaminants Detected Exceeding SQS ⁴
** Process of the control of the con					LDW-SS305	10/3/2006	590 J	20	3.01	1.7									LDW-SS305	840		
Part		Area 1	Scour	678	LDW-SS6	3/10/2005	1,920	183	1.05	15	- No	n/a	n/a	1	[150]	n/a	n/a	543	LDW-SS6	140		
Part		741041	Scoul	070	LDW-SS7	3/9/2005	240	8.82	2.72	0.74		11/4				IVa	100	010	LDW-SS7	560		
Mathematical Content of the conten					DR001	8/31/1998	99	3.3	3.01	0.28									DR001	610	Fail:CSL	Bis(2-ethylhexyl)phthalate
Math and Continue	0 to 1	Area 2	Scour	240	DR003	8/11/1998	267 J	12.6	2.12	1.1	No	n/a	n/a	1		n/a	n/a	639	DR003	600	n/a	none
Part	0101	Area 3	I	267	DR043	8/12/1998		Note 5	4.48	2.1	No	n/a	n/a	0	n/a	380 ft	Note 6	192	DR043	200	n/a	Butyl benzyl phthalate
Part		Area 4	S	490	TRI-026	8/8/2006	300 J	19	1.61	1.6	No	n/a	n/a	0	n/a	450 ft	Note 6	622	TRI-026	400	2 x Pass	
Part		711001	,	.,,,	LDW-SS26	1/18/2005	650	36	1.81	3		1,,0	11/4	Ŭ	iva	100 11	110.00	022	LDW-SS26	300		Butyl benzyl phthalate
Part		Area 5	ı	287	DR047	9/14/1998	158	11.3	1.4	0.94	No	n/a	n/a	0	n/a	525 ft	Noto 6	429	DR047	1 100	n/a	Fluoranthene
Mail Signature		711000	_ '	207	WIT290	9/16/1997	540	32	1.67	2.7	INO	170			i va	J23 II	110.00	727	51.017	1,100	1174	
		Area 6	S ⁵	287	DR018	9/2/1998	265 J	12	2.21	1	No	n/a	n/a	0	n/a	20 ft		580	DR018	500	n/a	Mercury
Part		Aroa 7	Scour	213	LDW-SS322	10/4/2006	280 J	37	0.766	3.1	No	n/a	n/a	1		n/a	n/a	705	LDW-SS322	570 J	n/a	Bis(2-ethylhexyl)phthalate
Meal Fine		74047			DR050	8/31/1998	240 J	Note 5	4.12	1.8				·	[13]	170			DR050	1,300		Chrysene
Area	1 to 2	Area 8	S	277	CH0030	10/16/1997	83 J	4.3	1.94	0.36	Yes	(1,010) [1998]	LDW-SS40				Note 6	258	LDW-SS40	95		
May	1 10 2												[2005]	0	n/a	175 ft			DR089	530		
						+			-													Bis(2-ethylhexyl)phthalate
Final Content Final Conten		Area 9	1	362			_			-	Ves			1		n/a	n/a	138				
Area 10 S 270 DATA 3 Ball 1988 279 Note 7 451 210 Note 1 Note 1 Note 1 Note 3 Note				002					+	-					[260]	170		.55				Benzyl Alcohol
Area 12 1 326 1 1 1 1 1 1 1 1 1		Area 10	S	270		1		n/a	1		No	n/a	n/a	0	n/a	270 ft	n/a	403			n/a	
		Area 11	S	249	DR148	8/18/1998	279 J	Note 7	4.51	2.1	No	n/a	n/a	1	Note 8	n/a	n/a	188	DR148	89	n/a	none
Area 12 I 326 I 10W-SS88 1725/2005 650 38 1.75 3.2 Yes (450) (660) 1 4 (150)	2 to 3	Area 12	I	326		10/22/1997	120	13	0.93	1.1		EIT074	(660)	1	· ·	n/a	n/a	128	LDW-SS88	190 J	Fail:CSL	
Area 13 Area 13 Area 13 Area 14 Area 15 Area 15 Area 16 Area 16 Area 16 Area 17 Area 17 Area 18 Area							660	38		-	Yes								DD172	75		
AN-019 10/24/2006 770 48 1.59 4 AN-020 10/24/2006 220 12 1.9 1 AN-021 10/25/2006 390 27 1.43 2.3 AN-021 10/25/2006 420 27 1.55 2.3 AN-023 10/25/2006 560 35 1.62 2.9 AN-025 10/25/2006 560 35 1.62 2.9 AN-026 10/25/2006 150 7.2 2.08 0.6 AN-027 10/25/2006 150 7.2 2.08 0.6 AN-027 10/25/2006 260 14 1.86 1.2 By B																						Mercury
Area 13 Area 13 Area 14 Area 15 Area 16 Area 17 Area 17 Area 17 Area 18 Area											=	EIT061	LDW-SS121								ı	
And the second of the second o																						
Area 13 A Area 14 A Area 14 A Area 14 A Area 14 A Area 15 A Area 15 A Area 15 A Area 15 A Area 16 A Area 17 A Area 17 A Area 18 A Area 1												[1997]	[2005]									
Area 13													I DW \$\$123									
Area 13								16				EST144		2		n/a						
AN-026 10/26/2006 150 7.2 2.08 0.6 resampled) [197/] (resampled, see below) AN-027 10/25/2006 260 14 1.86 1.2 Byb 8/13/2004 210 12 1.74 1 LDW-SS120 11/9/2005 630 J 32 1.94 2.7 LDW-SS121 1/25/2005 1,060 J 57 1.86 4.8 R34 10/9/1997 91 J 7 1.3 0.58 [2005] [2006] [197/] (resampled, see below) LDW-SS123 AN-019 [197/] (resampled, see below) [197/] (resampled, see below) AN-026 140 Fail: SQS Butyl benzyl pnthalate	2 to 4	Area 13	I	221	AN-025	10/25/2006	560 J	35	1.62	2.9		(1,500)					n/o	1/2	AN-025	150	Pass,	Lead
B9b 8/13/2004 210 12 1.74 1 B9b 94 LDW-SS120 1/19/2005 630 J 32 1.94 2.7 LDW-SS121 1/25/2005 1,060 J 57 1.86 4.8 R34 10/9/1997 91 J 7 1.3 0.58 [2005] [2006] [2006] [2006]	3 10 4			331	AN-026	10/26/2006	150	7.2		0.6		[1997]					11/4	102	AN-026	140	Fail: SQS	Butyl benzyl phthalate
LDW-SS120 1/19/2005 630 J 32 1.94 2.7 LDW-SS121 1/25/2005 1,060 J 57 1.86 4.8 (149) (770) R34 10/9/1997 91 J 7 1.3 0.58 [2005] [2006] R34 170													AN-019 (770)								-	
LDW-SS121 1/25/2005 1,060 J 57 1.86 4.8 (149) (770) R34 10/9/1997 91 J 7 1.3 0.58 [2005] [2006] R34 170										<u> </u>		(149)										
R34 10/9/1997 91 J 7 1.3 0.58 [2005] [2006] R34 170						+																

1) PCB SWAC calculated in GIS utilizing inverse distance weighted average using samples from the FS baseline dataset that were located both inside and adjacent to the proposed plots.

2) SQS exceedance factor for point data is based on measured TOC (or lowest apparent effects threshold, as applicable).

3) If no core was located in footprint, nearest core within 150 ft was evaluated. Given the heterogeneous nature observed in the data, PCB concentrations for borings only within 150 feet from the test plot are shown. Larger distances may µg/kg dw - micrograms per kilograms dry weight not be representative.

4) "Other Contaminants" excludes total PCBs.

5) Although Area 6 is not included in Recovery Category 1 in the EPA Proposed Plan, it may make a suitable scour mitigation plot area given the amount of vessel traffic known to occur in Slip 1.

6) Only sample in the footprint was from the 2009/2010 dioxin/furan sampling technical memorandum (Windward 2010), and it was not analyzed for total PCBs or cPAHs.

7) TOC exceeds the threshold where carbon normalization is performed.

8) Core not sampled and/or analyzed from 0 to 2 ft below mudline.

Plot Type: I = Intertidal; S = Subtidal; Scour = Recovery Category 1

cPAH - carcinogenic polyaromatic hydrocarbons

cm/yr - centimeters per year

CSL - cleanup screening level EF - exceedance factor

n/a - none applicable

mg/kg OC - milligrams per kilogram organic carbon

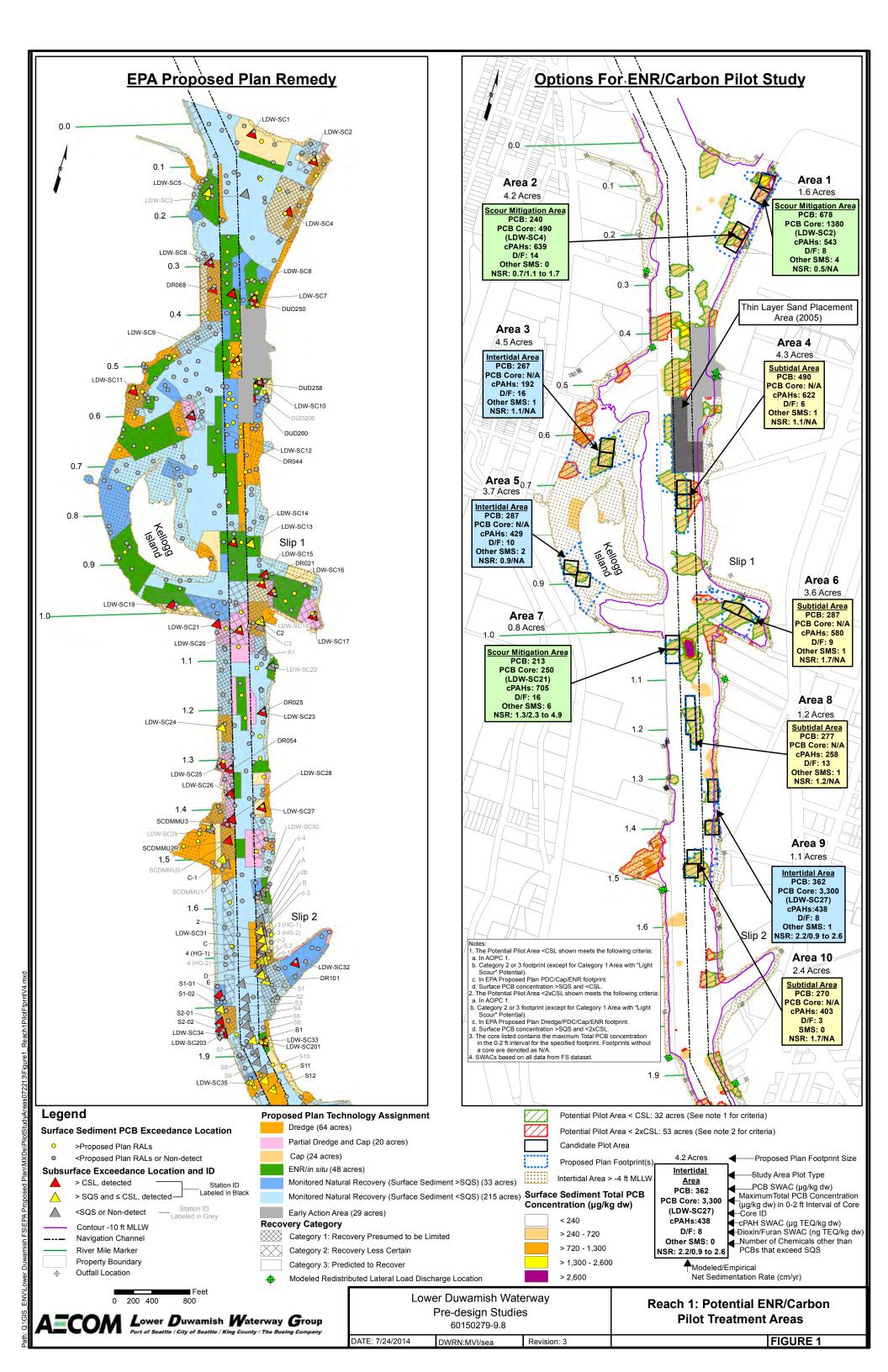
PCB - polychlorinated biphenyl

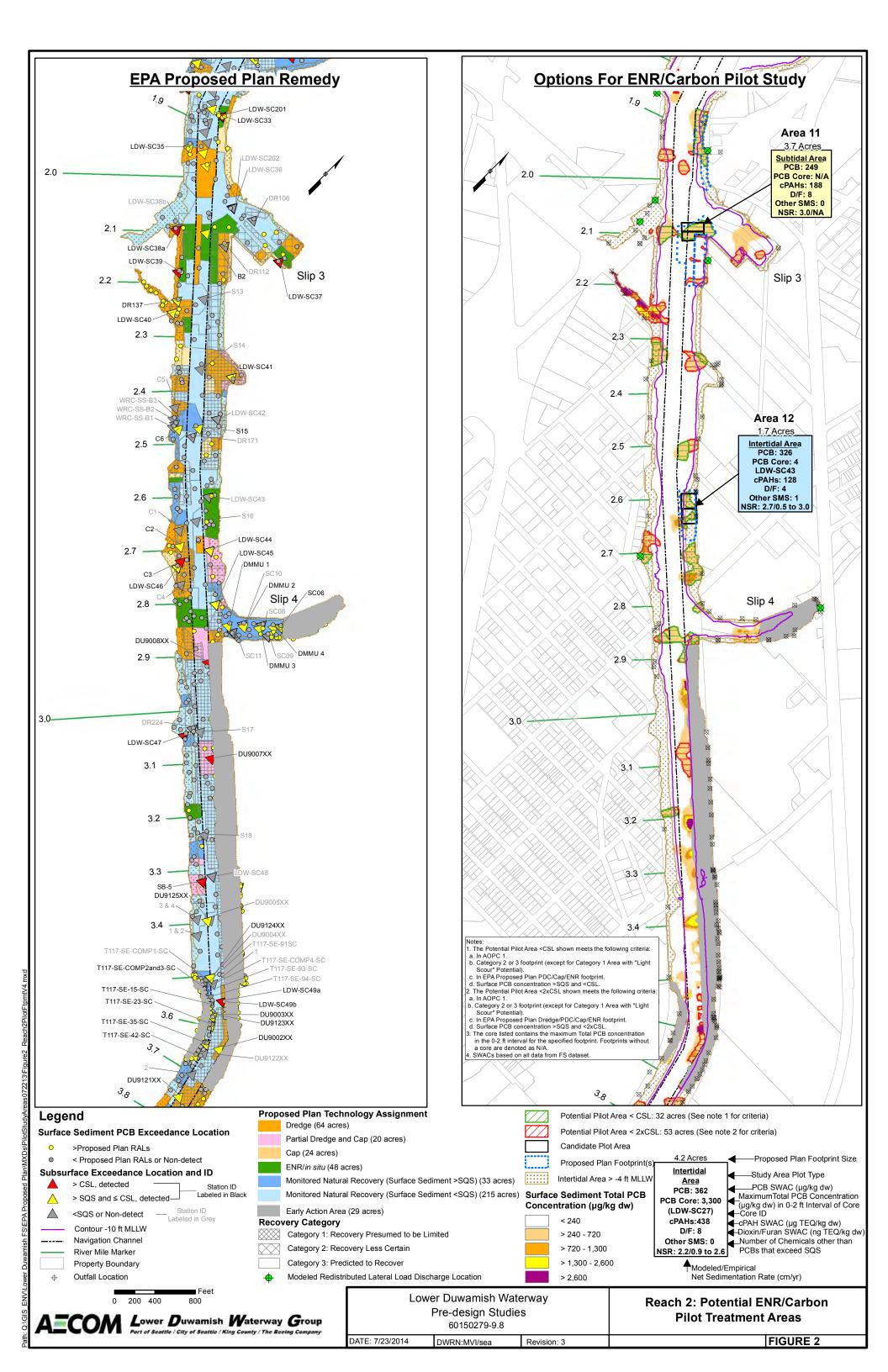
SQS - sediment quality standards

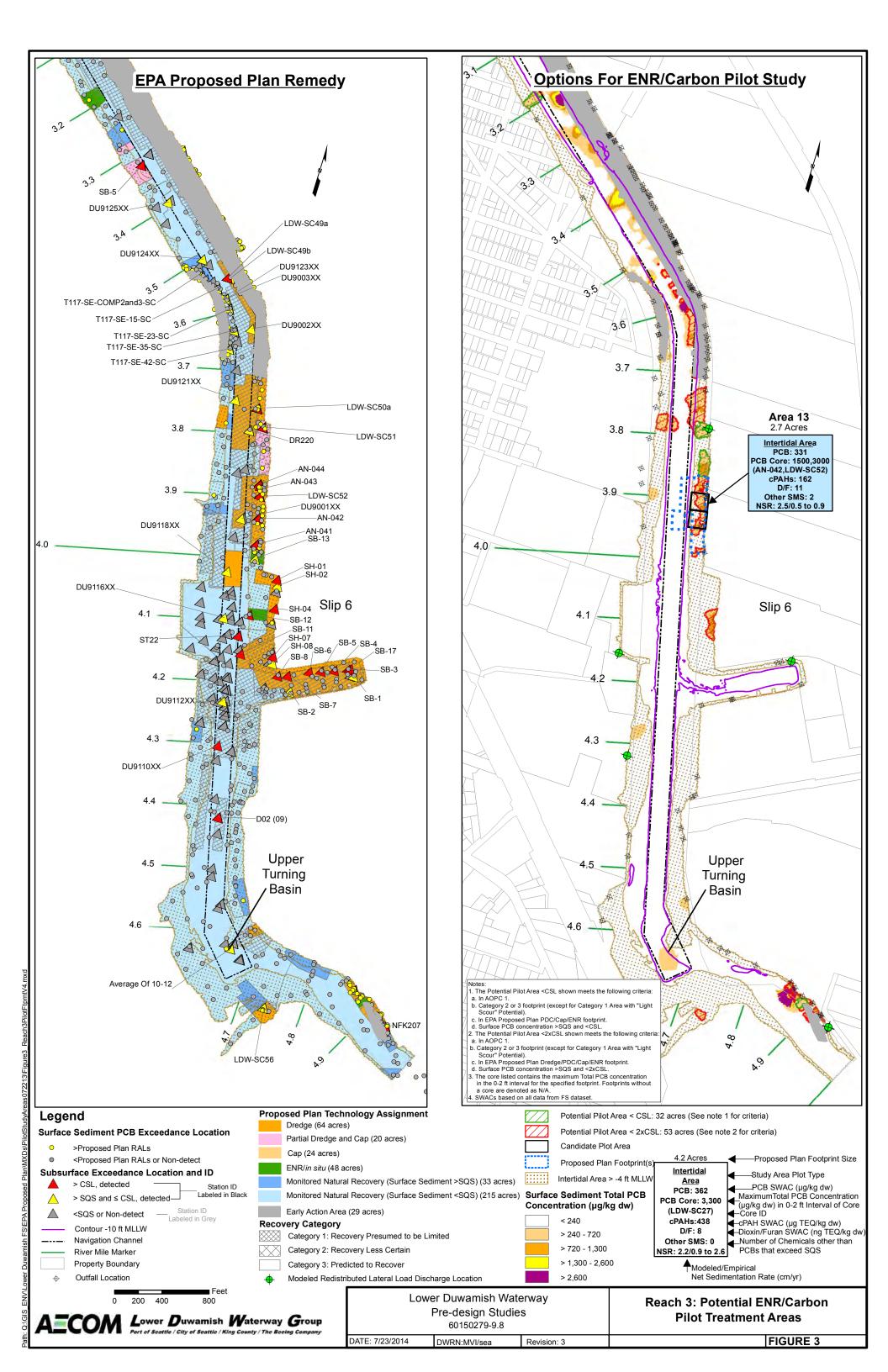
SWAC - spatially weighted average concentration

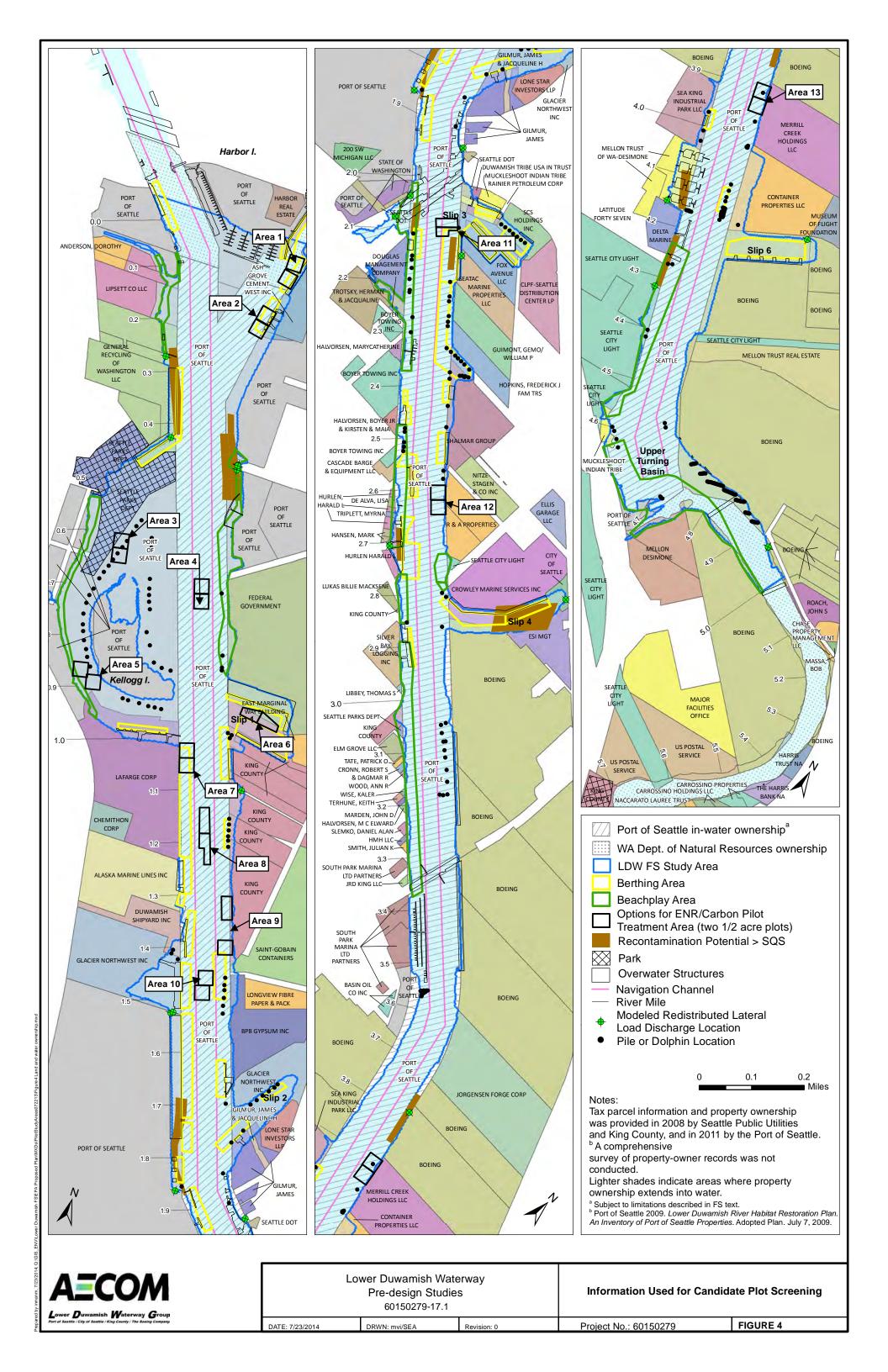
TEQ - toxic equivalent TOC - total organic carbon











Attachment 1 - Aerial Photographs

Notes:

- 1. Plot locations (shown in orange) are approximate and are not geo-referenced.
- 2. Photo scale varies



Area 1 -Scour Mitigation



Area 2 - Scour Mitigation



Area 3 - Intertidal



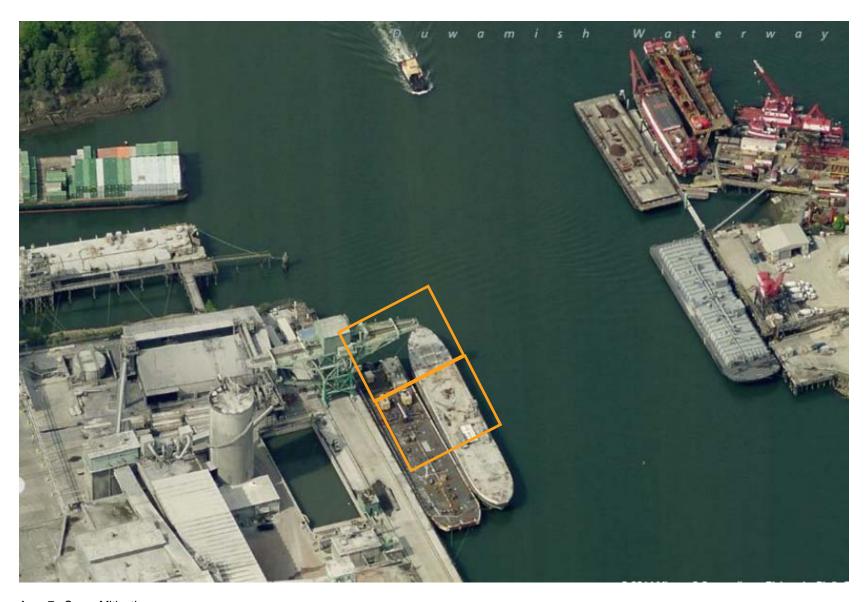
Area 4 - Subtidal



Area 5 - Intertidal



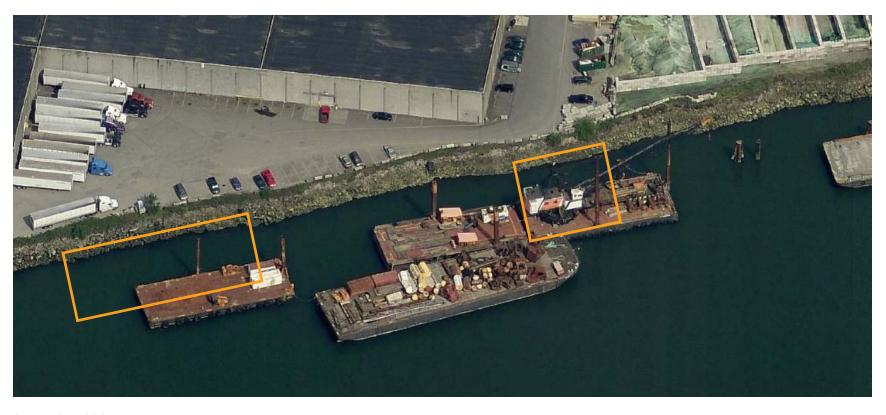
Area 6 - Subtidal



Area 7 –Scour Mitigation



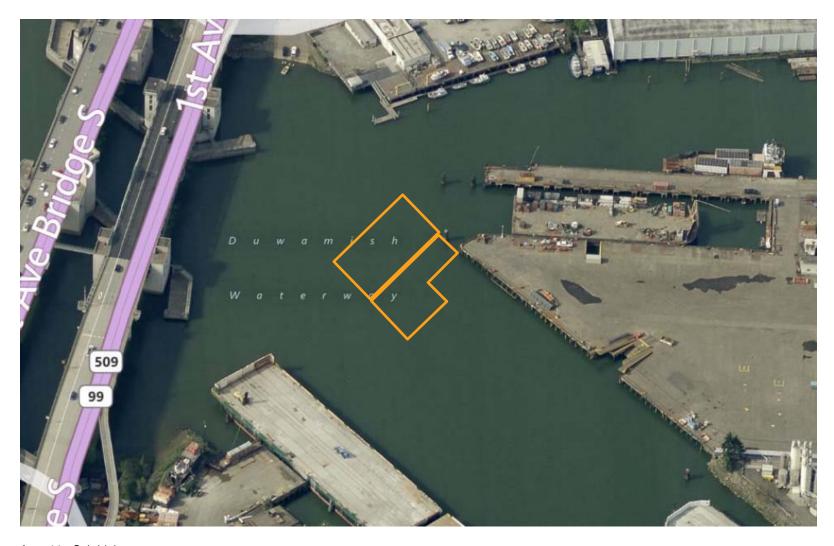
Area 8 - Subtidal



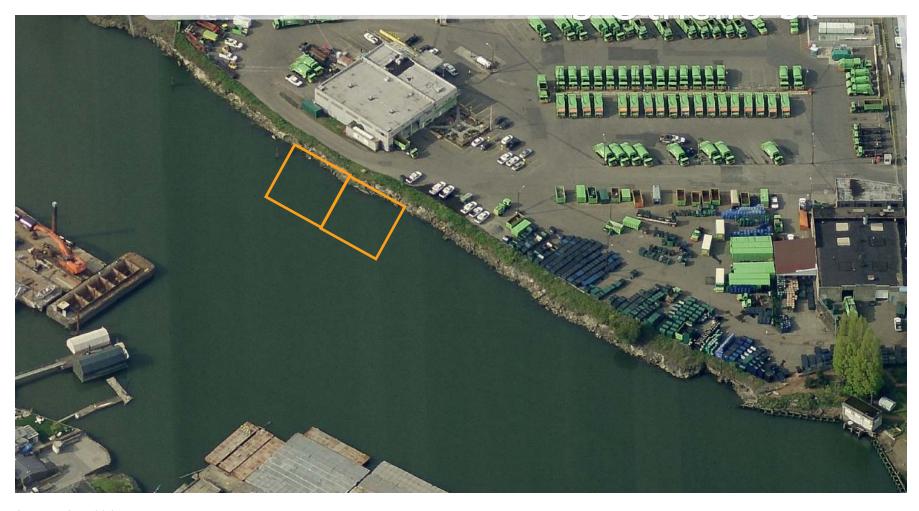
Area 9 - Intertidal



Area 10 - Subtidal



Area 11 - Subtidal



Area 12 - Intertidal



Area 13 - Intertidal

Attachment 2 - Sun Illumination Maps for Scour Mitigation Areas

