

Middle Waterway Estuarine Natural Resources Restoration

Project Concept Plan
Sampling and
Analysis Plan

March 1997

*Appendix A to the City of Tacoma
Natural Resource Damages Consent Decree*



City of Tacoma

This document is a reprint of the October 1996 document of the same title. This document and the October 1996 document differ in the following manner:

- 1. The date on the initial title pages has been corrected (updated);***
- 2. Selected graphics have been reproduced (but not changed) to enhance readability;***
- 3. The project schedule has been modified to reflect the passage of time.***

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MIDDLE WATERWAY
ESTUARINE NATURAL
RESOURCES RESTORATION

PROJECT CONCEPT PLAN
SAMPLING AND ANALYSIS PLAN

CITY OF TACOMA
MARCH 1997

CITY OF TACOMA
MIDDLE WATERWAY ESTUARINE NATURAL RESOURCES
RESTORATION PROJECT
MARCH 1997

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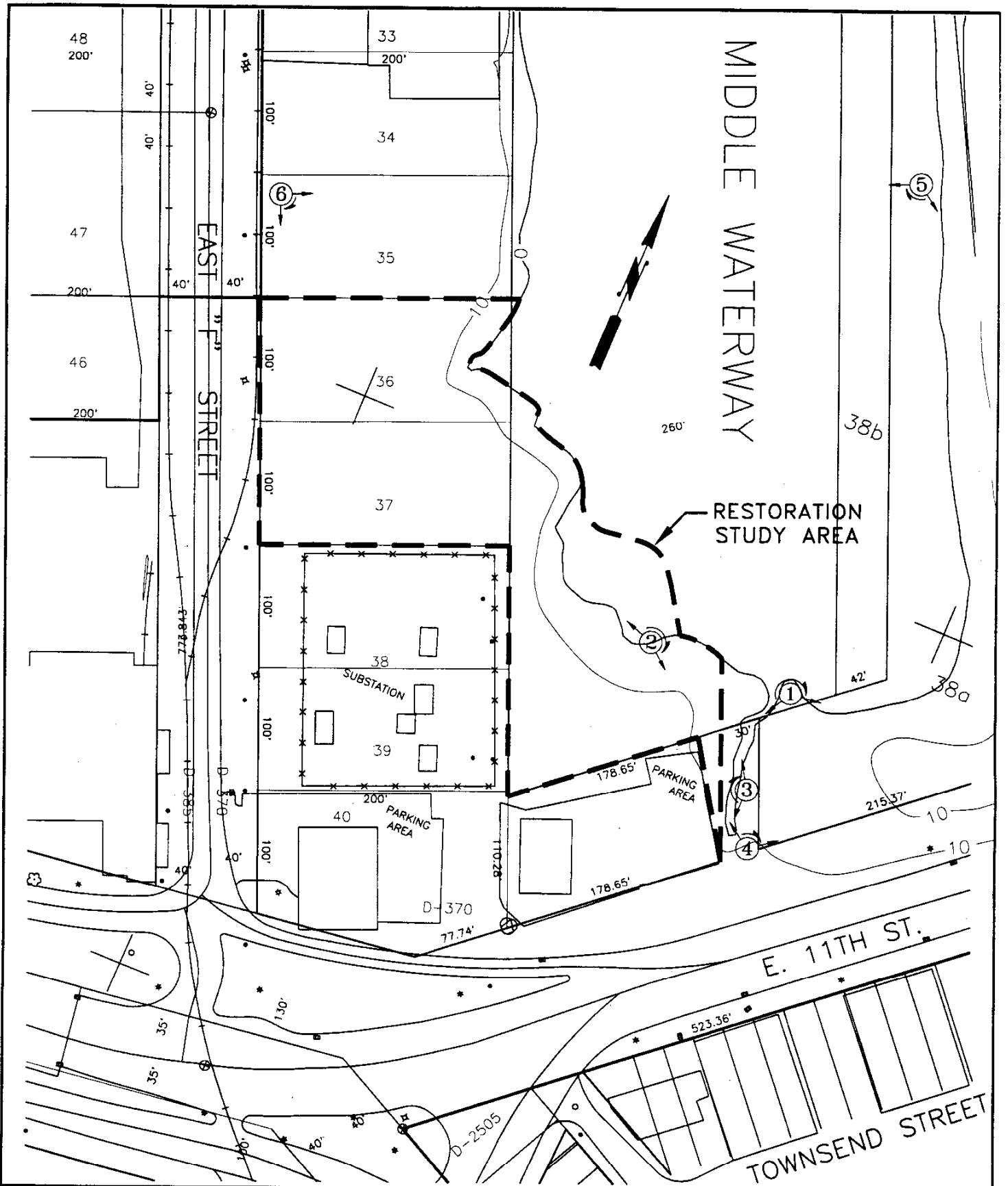
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City of Tacoma
Middle Waterway
Restoration Study Area

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City of Tacoma Middle Waterway
Estuarine Natural Resources
Restoration Project Proposal

Preface to the 1996 Reprint

The City of Tacoma Middle Waterway Estuarine Natural Resources Restoration Project Proposal, the document you are now reading, describes actions the City of Tacoma will undertake to restore estuarine marsh habitat in Middle Waterway in the City of Tacoma, Washington State. The City had originally planned to develop the project in 1995 but circumstances have resulted in a different course of action. As a result, the City revised its project schedule and re-issued the document with this preface.

The need for the project schedule revision is the result of discussions aimed at expanding the City's effort from a single restoration project to a series of such projects in the Commencement Bay area. These discussions stemmed in part from the positive response the original Middle Waterway project proposal received from agency staff upon its original (draft) publication in September, 1994. The City's discussions with the Natural Resource Trustees¹ were initiated in early 1995 with the thought that such projects could be used to satisfy a presumed natural resources damages liability. After a period of negotiation, the expanded proposal was accepted in concept and the Middle Waterway project will go forward as part of a series of projects, with the following project clarifications:

1. The project area includes 1.85 acres of City and State lands, as depicted in Figure MW-2.
2. The City will develop 1.05 acres of salt marsh habitat, 50% of which will be planted with native marsh vegetation appropriate to the site. The City may propose during project permitting, if federal, state and tribal resource staff agree, that an additional area or areas of salt marsh be re-established through natural re-colonization in order to investigate the efficacy of natural re-colonization in this shoreline or if a higher value of habitat can be achieved through an alternative expenditure.

Material at the new intertidal interface and immediately below will be demonstrably suitable for use in the intertidal environment. Where subsurface exploration or

¹ National Oceanic and Atmospheric Administration (NOAA); U.S. Fish and Wildlife Service (USFWS); Muckleshoot Indian Tribe; Puyallup Indian Tribe, Washington State Department of Ecology (acting as State lead), and the Washington State Departments of Fish & Wildlife; and Natural Resources.

project excavation reveals fill at the proposed wetland surface, such fill shall be excavated to a depth of 3 feet or to a depth where wood or other unsuitable fill material is not evident, whichever is less, and suitable material shall be placed in its stead. Where subsurface exploration reveals native material at the proposed intertidal surface and to a depth of two feet below that surface, the proposed surface would be considered suitable.

3. The City will develop 0.60 acres of riparian habitat, less any amount developed for public access from East F. St., existing utility tie-downs, or source control facilities agreed to by the City and the parties. 100% of the riparian area will be planted with native vegetation appropriate to the site.

The City will utilize soil amendments in the riparian area in a manner suitable for shoreline environments.

Irrigation will be provided for all shrub and tree riparian plantings.

4. The City will restore 0.20 acres of mudflat to provide transition from existing mudflat to the restored salt marsh.
5. A planting plan will be developed for the restoration site during project permitting and would be subject to the review, comment and approval of resource and permitting agencies prior to the issuance of project permits. Proposed plantings will be based upon a review of similar projects in the Commencement Bay Area.
6. The City will develop public access from either 11th St. (Figure MW-4) to an overlook on State or private property, or from East F. St. to an overlook on city property. In general, access from 11th St. is preferred in order to connect to a bicycle lane on that street. However, the 11th Street access route crosses private property and is contingent on reaching an agreement with the private landowner.
7. The project will result in the removal of the contaminants from City and State property identified as sources of contamination to the Middle Waterway by the Washington State Department of Ecology.² The properties were sampled by the City of Tacoma in July and August of last year as described in the June 1995 Sampling and Analysis Plan reproduced here. The issuance of the site characterization report will be the first step toward obtaining project permits and eventual project construction. Initial data has been provided to the United States Environmental Protection Agency and the Washington State Department of Ecology.

² Washington State Department of Ecology. 1994. *Commencement Bay Nearshore/Tideflats Middle Waterway Source Control Status Report: Milestone 1. January, 1994.*

8. The City has included in the project budget funds sufficient for monitoring and maintenance of the project over a five year period. Funds have been budgeted for maintenance and the implementation of recommendations developed through project monitoring at an amount equal to 25% of the expected construction cost, or 5% per annum for five years. Additional funds are available for the monitoring of site conditions annually for five years. If funds are not utilized as part of the monitoring and maintenance program, they will be available for the implementation of project elements arising outside of the formal monitoring program or for restoration actions elsewhere in Commencement Bay at the discretion of the trustee agencies.

A note on the value of this type of habitat restoration project, located in this part of the Puyallup River/ Commencement Bay, may also be warranted and is provided below.

Estuarine marshes are one of the primary sources of carbon that drive the estuarine food web. Carbon, and the chemical energy associated with carbon molecules, comes into the estuarine system via primary production (i.e. is produced within the estuary by plants) and via import from the adjacent river and shoreline environments. The largest source of carbon to the estuary is the river. However, each source of carbon is important as each enters the estuary at different rates at different times of the year and each supports a different type of vertebrate or invertebrate organism. The organic matter that is exported as detritus from estuarine marshes to mudflats supports, for example, an assemblage of macro-invertebrates which are a primary prey organism of juvenile salmon (Simenstad, 1983). Estuarine marshes as a result provide indirect and perhaps indispensable support for a commercial, sport, subsistence and ceremonial fishery that remains central to life in the Pacific Northwest. Estuarine marshes also provide feeding opportunities for terrestrial mammals and wintering waterfowl. Mallard, pintail, and American widgeon, among others, feed directly on the seed of estuarine marsh grasses, and the northern harrier hunts deer mice and shrews in the marsh (Schultz, 1990). The restoration of estuarine marsh habitat was one of six recommendations put forth by researchers investigating historic changes in populations of fish and shellfish in Commencement Bay (Wampler, 1991).

A number of approaches have been attempted to define the value of such habitats. Mitsch and Gosselink (1986) review the difficulties inherent in such a valuation, i.e., wetlands are multiple value systems; their most valuable products are public amenities with limited value to a private landowner; and that as wetland area decreases, the marginal value increases. The increasing value of a diminishing resource is particularly relevant in Commencement Bay, where 240 of the original 6000 acres exist today, the remainder having been converted to upland uses or otherwise "lost" (USACOE, et. al., 1993). Although Commencement Bay wetland habitats have not been reduced to their last acre,

clearly there have been reductions in extent and function.³ Consultants to federal agencies have concluded that "restoration of nearshore wetland habitat would benefit natural resources in this area and enhance fish and wildlife populations."

The desirability of restoring habitat in Middle Waterway was addressed by the Commencement Bay Cleanup Action Committee (CBCAC) in 1993. The CBCAC publication *A Vision for Commencement Bay* states that, "One of the most substantial contributions to the restoration of habitat and natural resources could be the preservation of the 18 acre Middle Waterway mudflats and the restoration of its shoreline...(which)..represents the largest original tideflat west of the Puyallup Delta." Restoration in this area would satisfy restoration planning goals and also be consistent with local economic development initiatives.

References

Commencement Bay Cleanup Action Committee. 1993. *A Vision for Commencement Bay*. Commencement Bay Cleanup Action Committee, Tacoma, WA.

Mitsch, W.J. and J.G. Gosselink. 1986. *Wetlands*. Van Nostrand Reinhold.

Schultz, S.T. 1990. *The Northwest Coast*. Timber Press, Portland, OR.

Simenstad, C.A. 1983. *The Ecology of Estuarine Channels of the Pacific Northwest Coast: A Community Profile*. United States Fish and Wildlife Service,. FWS/OBS-83-05. 181 pp.

United States Army Corps of Engineers, US Fish and Wildlife Service, National Oceanic and Atmospheric Administration, US Environmental Protection Agency. 1993. *Commencement Bay Cumulative Impact Study. Vol. 1, Assessment of Impacts*. United States Army Corps of Engineers, Seattle District Office, Seattle, WA.

Wampler, P.L. 1991. Changes in Populations and Distributions of Anadromous Fish, Demersal Fish, and Shellfish Utilizing nearshore Habitat in Commencement Bay, 1850-1988, in, *Commencement Bay Cumulative Impact Study. Vol. 1, Assessment of Impacts*. United States Army Corps of Engineers, Seattle District Office, Seattle, WA.

³ The United States Fish and Wildlife Service offers a somewhat more forceful assessment: "(N)early total loss of habitat resulted in nearly total loss of many species endemic to the bay during the 138 years prior to 1988." (Wampler, 1991)

Foreword

The Project Concept and Sampling and Analysis Plan presented here for the restoration of estuarine habitat in Middle Waterway were prepared under the direction of staff at the City of Tacoma Public Works Department (Utility Services Engineering and Laboratory). In preparing this plan, City staff utilized the *Sampling and Analysis Plan for the Middle Waterway Shore Restoration Project*, prepared by Parametrix, Inc. for Simpson Tacoma Kraft Company and the Natural Resources Trustees, as a guide.⁴ This City project, adjoining in locale and similar in habitat objectives to the Simpson/Trustee project, is in many ways a mirror to that project; the Sampling and Analysis Plan approved for that project therefore seemed a logical point of departure.

A factor which differentiates the City project (west side) from the Simpson/Trustee Project (east side) is the status of the west side properties with respect to the Middle Waterway Superfund Area. Properties on the west side within the restoration study area have been identified as sources (minor) of contamination to the waterway due to the chemical composition of material found on the banks. This sampling plan, and restoration concepts to be finalized after data collection, will by necessity address a contamination issue somewhat different from that addressed under restoration efforts on the east side.

Restoration planning would begin with completion of an environmental site characterization; the City sampled in the restoration study area in June of last year (1995). The results of sampling will be used to develop a conceptual or preliminary restoration design, consistent with site conditions and 404 permitting policies, during the following months. Substantial completion of preliminary design will allow the City to develop and circulate a more complete project description and begin the local permitting process. Completion of local permitting in turn triggers the state and federal permitting process, which would presumably be followed by construction in the summer of 1997. A more complete restoration project schedule is presented in Table MW-1 of this report.

A Note on Datums

Topographical data in Figures 2, 5 and 6 of this report describe existing conditions based upon the National Geodetic Vertical Datum, 1929 (NGVD29). This data is based upon aerial photogrammetric data collected by the City in 1990. NGVD29 is the datum appropriate for engineering and land surveying uses, where precision and accuracy with respect to elevations requires the use of an exact standard. For this reason, the City's Geographical Information

⁴The City also utilized the Quality Assurance Project Plans (QAPPs) prepared for recent Hylebos and Thea Foss Waterway biological and sediment testing, respectively, to prepare the QAPP included as an appendix to this document. The Hylebos QAPP was made available with the permission of Hylebos Cleanup Committee and their consultant team. The Foss QAPP was prepared by consultants to the City.

Systems City-Wide Base Map Data Base, which was used to produce these figures, utilizes NGVD29.

Topographical data depicted in habitat concept plans is reported relative to MLLW. This datum is utilized in Figures 3, 4, 7, 8 and 9. MLLW is the generally accepted and appropriate datum for biological investigations and restoration planning. In the intertidal environment, elevation with respect to a base hydraulic condition is a meaningful descriptor allowing comparison of flora and fauna between sites, while elevation relative to an arbitrary land based system may hamper the comparison of information between sites. The use of two datums in this report is unfortunate and at times confusing; as an aide to the reader, we have periodically presented in the text the NGVD29 elevation in parentheses following elevations presented relative to MLLW.⁵

Acknowledgment

City staff acknowledge the staff of the Simpson Tacoma Kraft Company and the Natural Resources Trustees (NOAA, USFWS, Dept. of Ecology, and the Puyallup and Muckleshoot Indian Tribes) for their pioneering habitat restoration efforts in Middle Waterway.

⁵In Commencement Bay using the NGVD29 datum, MHHW is located (approximately) at elevation 5.5 feet, and MLLW is located (approximately) at elevation -6.3 feet. An elevation relative to NGVD29 is converted to a MLLW elevation by adding 6.3 feet to the NGVD29 value.

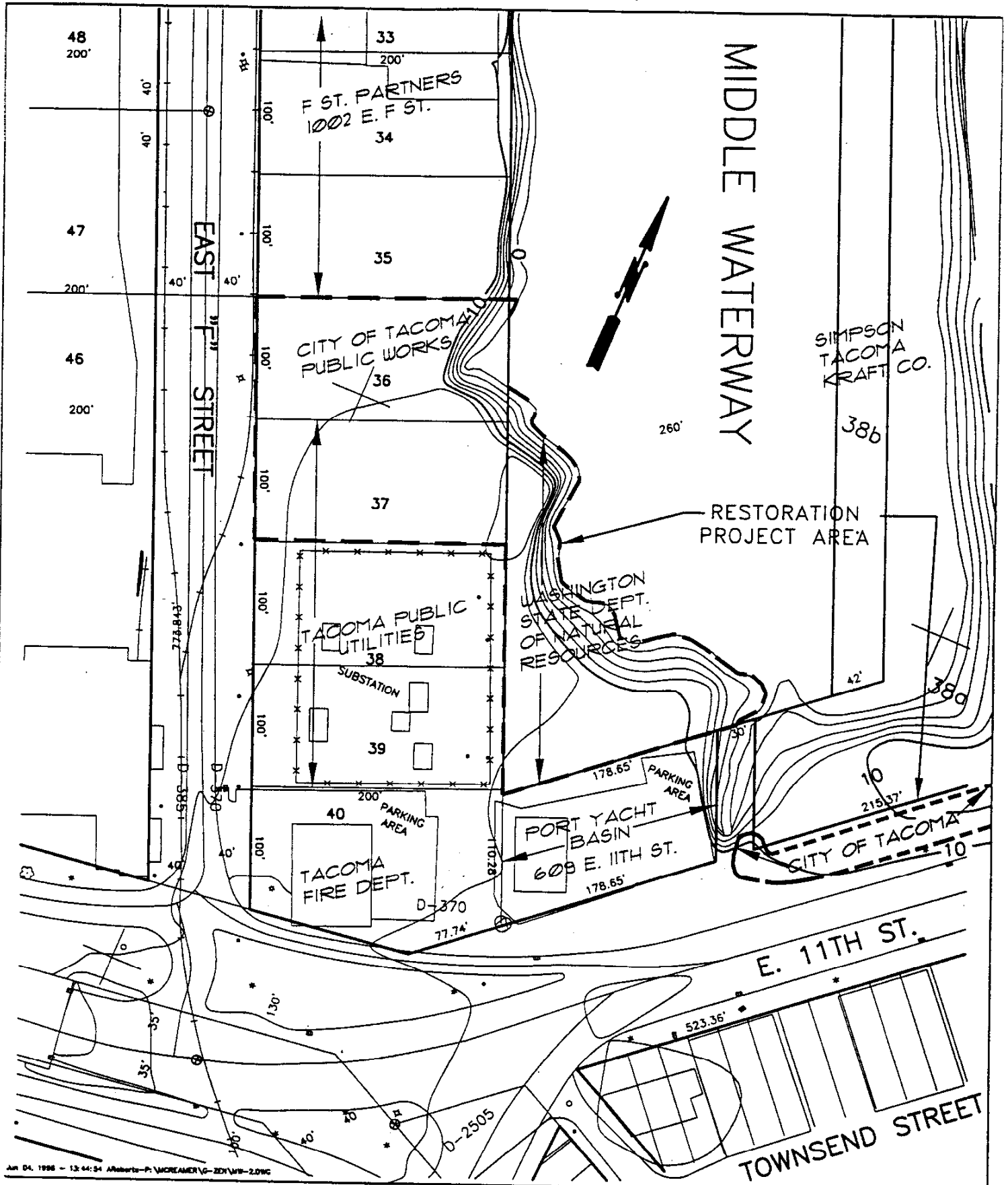
PROJECT CONCEPT PLAN
October 1996

1.0 INTRODUCTION

The City of Tacoma is proposing to develop an estuarine shoreline wetland restoration project on Middle Waterway within the City of Tacoma and Commencement Bay (Figures MW-1 & 2). Excavation or re-grading of the 1.85 acre vacant upland property, located adjacent to and within the southwest shore of the Waterway, would result in the establishment of intertidal marsh and riparian buffer bordering one of the few remaining original mudflats within Commencement Bay. The project would create new habitat, enhance existing habitat, buffer both new and existing habitat, and provide public access for education and passive recreation.

The project has been designed for the specific and single purpose of enhancing and expanding estuarine wetland habitat. Project goals are to:

1. Demonstrate the viability of reclaiming former industrial shorelines for estuarine intertidal habitat.
2. Restore and enhance estuarine habitat for juvenile salmonids, particularly Chinook (*Oncorynchus tshawytscha*), pink (*Oncorynchus gorbuscha*), and chum salmon (*Oncorynchus keta*), originating in the Puyallup River System.
3. Provide increased emergent, intertidal wetland habitat for wetland dependent species in the lower Puyallup River estuary.
4. Provide habitat linkages to and between nearby estuarine intertidal mudflat and marsh habitats.
5. Increase awareness of the desirability of additional habitat restoration efforts within Middle Waterway, one of the largest tracts of intertidal mudflat remaining in Commencement Bay.
6. Complement and protect the Natural Resources Trustee/Simpson Middle Waterway restoration project and existing tideflats through the conversion of industrial shoreline property to habitat.
7. Provide an opportunity to investigate the viability of habitat in an urban estuarine environment.
8. Provide a non-intrusive environmental education/public access opportunity in close proximity to the city center to increase public awareness of the importance of this type of habitat within the Commencement Bay ecosystem.



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City of Tacoma
Middle Waterway
Restoration Study Area

Figure MW-2
Southwest Shore and
Property Ownerships

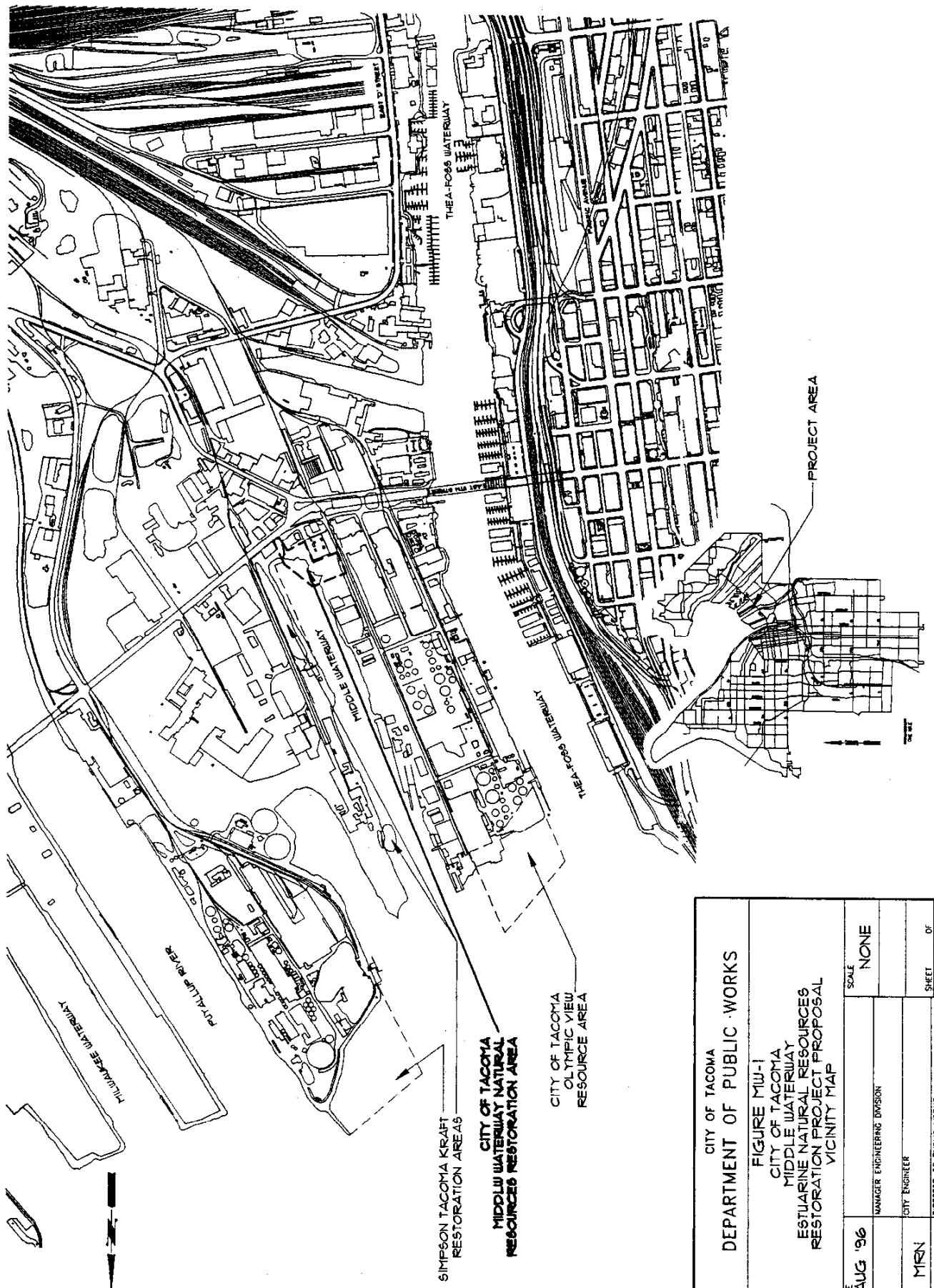
1.1 PROJECT PROPOSAL

The City is proposing a project to restore estuarine intertidal habitat on 1.85 acres of vacant property adjacent to Middle Waterway. Restoration activity would include the excavation and re-grading of vacant upland property adjacent to and possibly within the southwest shore of the Waterway. Intertidal wetland and riparian habitat would be constructed along the shore of the waterway and debris and other anthropogenic material would be removed from the surface of the existing shoreline. Limited public access for education and passive enjoyment would be permitted on the upland portions of the site.

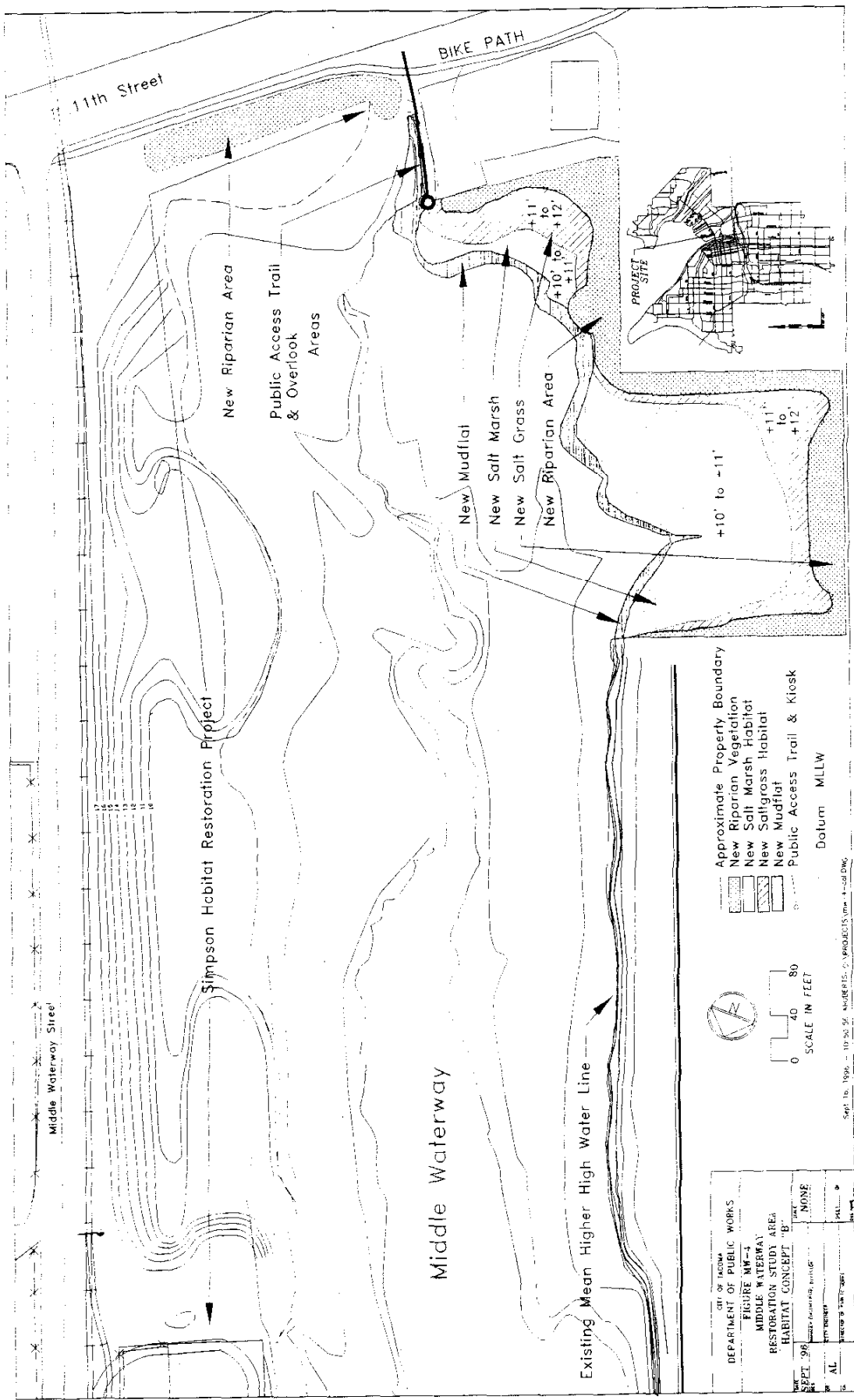
As part of the restoration effort, the City would remove fill material from the project site and the head of Middle Waterway along the western shore. The City would re-grade the elevation of much of the project area to a level of +10 ft to +11 ft MLLW (4-5 ft. NGVD29, approximately), the elevation at which *Salicornia* and *Carex* (Lyngby's Sedge) is found in Middle Waterway and elsewhere in the estuary. If suitable, the excavated material would be used as fill in other areas of the project. One project concept would utilize a portion of this material in existing intertidal areas to create additional habitat for *Salicornia* and *Carex*. Re-establishment of intertidal vegetation would be by natural colonization (as evident in the southern area of the waterway) or by planting efforts. Schematic drawings of two project concepts are depicted in Figures MW-3 and MW-4, but final project plans, which would include the limits of excavation, over-excavation, fill and backfill and the extent of vegetative plantings would be based upon discussions with the regulating and resource agencies.

Restoration at this site presents both unique challenges as well as opportunities. The intertidal sediments adjacent to the project site are within the Middle Waterway Superfund Problem Area, although they are not identified for active remediation under the EPA Commencement Bay Record of Decision (ROD). The sediments on the banks of certain properties, however, are described as a minor source of contaminants to the Waterway by the Department of Ecology (Department of Ecology, 1994). The restoration project would result in the removal of this reported source of contamination to the waterway. Likewise, seeps to the waterway, although small, contain concentrations of copper in excess of state standards. The removal of subsurface material would presumably remove the source of seep contamination. Construction debris, a substrate largely unsuitable as habitat, would also be removed under a general plan of site grading.

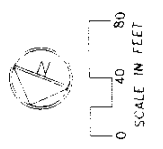
The project schedule is included in this document as Table MW-1. The City initiated the environmental characterization upon publication and approval of the Sampling and Analysis Plan in 1995. Upon completion of the site characterization report, the City will initiate the shoreline substantial development permit application process, the first in a series of state and federal permits. The City Storm Utility, the project proponent, would work with the agencies and City regulators (Building and Land Use Services) through out the fall months to ensure that both cleanup and habitat considerations are addressed in a manner consistent with applicable local, state and federal regulations. Presumably, when the local, state and federal permits are issued in



CITY OF TACOMA		SCALE	NONE
DEPARTMENT OF PUBLIC WORKS		MANAGER ENGINEERING DIVISION	
FIGURE MW-1		CITY ENGINEER	
CITY OF TACOMA		DIRECTOR OF PUBLIC WORKS	
MIDDLE WATERWAY			
ESTUARINE NATURAL RESOURCES			
RESTORATION PROJECT PROPOSAL			
VICINITY MAP			
DATE	AUG '96		
DWG			
DR	MSN		
CK			
		SHEET	OF
		DWG. NAME	

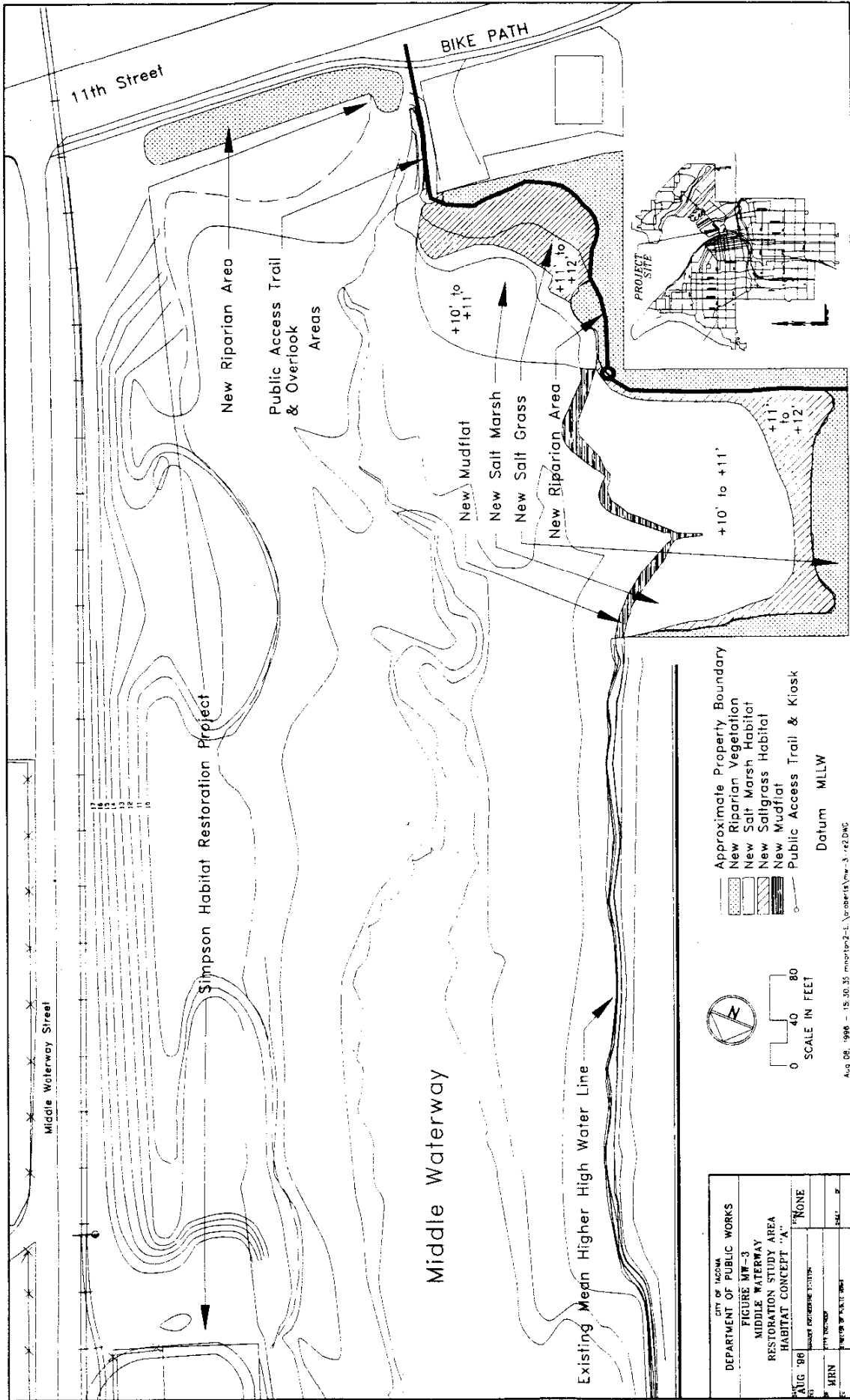


- Approximate Property Boundary
- New Riparian Vegetation
- New Salt Marsh Habitat
- New Saltgrass Habitat
- New Mudflat
- Public Access Trail & Kiosk
- Datum: MLLW

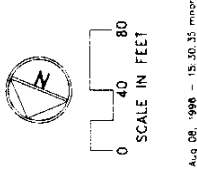


CITY OF TACOMA	
DEPARTMENT OF PUBLIC WORKS	
FIGURE MW-4	
MIDDLE WATERWAY	
RESTORATION STUDY AREA	
HABITAT CONCEPT "B"	
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SCALE: NONE	DATE: [signature]
PROJECT: AL	DATE: [signature]

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- Approximate Property Boundary
- New Riparian Vegetation
- New Salt Marsh Habitat
- New Saltgrass Habitat
- New Mudflat
- Public Access Trail & Kiosk
- Datum MLLW



CITY OF INDIANAPOLIS	
DEPARTMENT OF PUBLIC WORKS	
FIGURE MW-3	
MIDDLE WATERWAY	
RESTORATION STUDY AREA	
HABITAT CONCEPT 'A'	
DATE	AUG '98
DESIGNED BY	HRN
CHECKED BY	HRN
SCALE	NONE
DATE	AUG '98

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the latter part of 1996, such permits would reflect a cleanup and restoration plan that is consistent with state and federal regulatory program requirements.

As part of project planning and design, the City conducted a sediment characterization of properties within the restoration study area, with a primary objective of characterizing sediments at elevations that correspond to the proposed new grade (i.e. at proposed future intertidal elevations). Sampling was conducted in accordance with EPA Contract Laboratory Procedures (EPA CLPs) for chemical analysis and Puget Sound Estuary Program Protocols (PSEP Protocols) for biological analysis.

The objectives of the sampling program are:

1. Characterize the sediment quality of the proposed future intertidal surface to ascertain the feasibility of establishing intertidal habitat on the property.
2. Characterize the sediment quality in intertidal mudflats immediately adjacent to the project site to provide a description of the baseline environmental conditions in the immediate vicinity.
3. Characterize more completely sediment quality of the bank area on the project site.
4. Characterize sediment quality in material that may be utilized as fill in intertidal areas.

The sampling plan was similar to that proposed and executed by Simpson Tacoma Kraft and the Natural Resources Trustees in that:

- o The project involved the characterization of surface sediments and subsurface saturated fill material (materials occurring below +11.8 ft). The chemical characterization of the overlaying soils was not within the scope of this plan.
- o The sampling of deeper strata in upland areas was by backhoe at low tide.
- o Sediment in the mudflat adjacent to the project area was sampled at a depth of 0-10 cm depth for chemical and biological analysis and at depths of 1-2 feet and 2-3 feet for sediment quality analysis. All sediments were analyzed for acid-base/neutral compounds, total and acid volatile sulfides, mercury, and conventional parameters (grain size, total organic carbon, ammonia and total sulfide). Samples at 0-10 cm were also subject to biological characterization utilizing the amphipod *Rhepoxynius abronius*; echinoderm larval (*Dendraster excentricus*), juvenile polychaete (*Neanthes*), benthic community structure, and Microtox tests under PSEP protocols. Benthic population will be enumerated to the lowest practical taxonomic level.

**CITY OF TACOMA
MIDDLE WATERWAY ESTUARINE RESTORATION
PROJECT SCHEDULE**

ID	Task Name	Start Day	Finish Day	Year 1				Year 2				Year 3								
				Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4					
1	Middle Waterway Estuarine Restoration	1	630																	
2	Baseline Habitat Data Collection	0	365																	
3	Preliminary Design	0	60																	
4	Shoreline/Wetland Permit Applications	45	45																	
5	Deed Restrictions Filed (1)	180	180																	
6	Shoreline/Wetland Permit Review	45	135																	
7	City Shoreline/Wetland Permit Approval	135	135																	
8	Corps Of Engineers Permit Application (2)	150	150																	
9	State Shoreline Permit Approval	165	165																	
10	Corps Of Engineers Permit Review (3)	150	330																	
11	Final Design	225	315																	
12	CMMP Submittal (4)	240	240																	
13	Corps Of Engineers Permit Approval	330	330																	
14	CMMP Approval	330	330																	
15	Bid and Contract	360	420																	
16	Construction (5)	420	600																	
17	Notice of Completion (6)	630	630																	

Notes:

1. Start Date: Consent Decree entry date. Deed restrictions will be filed within 180 days of the entry of the Consent Decree or acquisition. The date shown is a surrogate date.
2. Anticipated Date. The US Army Corps of Engineers permit application is to be filed within 30 days of the City of Tacoma notice of exemption or approval of the shoreline/wetland permits.
3. Application for State Water Quality Certification and Hydraulic Permit application will be filed during the Corps permit review.
4. Anticipated Date. CMMP (Construction, Maintenance, Monitoring/Adaptive Management Plans) will be filed with the Natural Resource Trustee Agencies within 90 days of the Corps permit application.
5. Anticipated Date. Notice of completion will be filed with the Natural Resource Trustee Agencies within 300 days of the Corps permit and Trustee CMMP approvals.



Project: Middle Waterway
Date: Mar 6 '97

The second part of the document, the *Sampling and Analysis Plan*, outlines sampling and analysis procedures that were followed during the sediment characterization of the Middle Waterway project site. The plan was developed in accordance with the protocols and quality assurance/quality control (QA/QC) objectives set forth in EPA Contract Laboratory Procedures for chemical analysis and *Puget Sound Estuary Protocols Recommended Guidelines for Measuring Selected Environmental Variables in Puget Sound* (USEPA, 1991) for biological analysis.

1.2 SITE HISTORY

Prior to the 1880s, the area now occupied by Middle Waterway existed without improvements as part of a larger tract of open water, mudflat and emergent marsh below the two main distributary channels of the Puyallup River. The transformation of the area began in 1888, when the St. Paul and Tacoma Lumber Company established what became the region's pre-eminent mill on marsh land situated between the mouths of the two distributary channels of the river, an area known as "the Boot", directly south of present day Middle Waterway. Until that time, the Puyallup River's main channel divided into two near present-day Interstate 5 and the western channel of the river met Commencement Bay in the embayment at the base of a forested bluff. Between 1888 and 1891, this embayment was dredged and a cut-off wall constructed at the head of the west channel, diverting the flow of the entire river through the eastern channel. The former west river channel, cut off from the flow of the river, became the Wheeler-Osgood Waterway, and the embayment the Thea Foss (City) Waterway. Twenty years later, construction of the Auburn Wall diverted the entire flow of the White River out of the Green-Duwamish basin and into the Puyallup River, where it remains to this day, doubling the flow rate in the Puyallup. (Morgan 1979, 1982; Magden and Martinson, 1982; Pierce County, 1992; USACOE, et. al., 1993).

Shortly after the St. Paul and Tacoma Mill became operational, the company constructed a pier extending from the mill south of East 11th Street into the deeper harbor area (Morgan 1979). In 1896, bulkheads were constructed about 600 ft north of East 11th Street and filled with mill debris and sawdust wastes (Sanborn 1896). Eventually, a piling wharf was extended beyond the fill to the Harbor line and schooner loading facilities. Between 1907 and 1913, the Middle Waterway, newly created by fill on either side, was dredged for navigation.

Major growth and expansion near and adjacent to the head of the Middle Waterway occurred in the 1920s and 1930s. Tennent Steel (later the Western Steel Casting Co.) built a foundry and mill in 1923 near the head of the waterway. The mill site apparently abutted the waterway on the southwest side. Berkhiemer Manufacturing (roofing products) preceded Tennent Steel, apparently on the same or an adjacent property. A series of small brass, aluminum, and steel foundries also operated on both sides of East 11th Street at the head of the waterway (Hart Crowser, 1991).

Since it's original dredging, the waterway's use for navigational commerce peaked at some unknown time and then declined. Four wharves were utilized in the Waterway for lumber and berthing (USACOE, et. al., 1993) between 1927 and 1941; however, by this latter date, shoaling had established tideflat habitat in the lower half of the waterway. Tideflats are at this writing exposed in much of the waterway at low tides, and in most of the waterway at extreme low tides.

1.3 RESTORATION STUDY AREA SITE CONDITIONS

The Restoration Site Study Area (the project site and adjacent tideflats) is comprised of vacant uplands, steep banks and tideflats. Data describing qualitatively the physical, chemical, and biological conditions of the study area was collected as part of a site characterization and will be published as a site characterization report prior to project permitting. A general discussion of site characteristics and previous sampling and analysis - which guided preparation of the sampling and analysis plan (Section 2.0) for the site characterization - is provided below.

1.3.1 City of Tacoma/Public Works Property

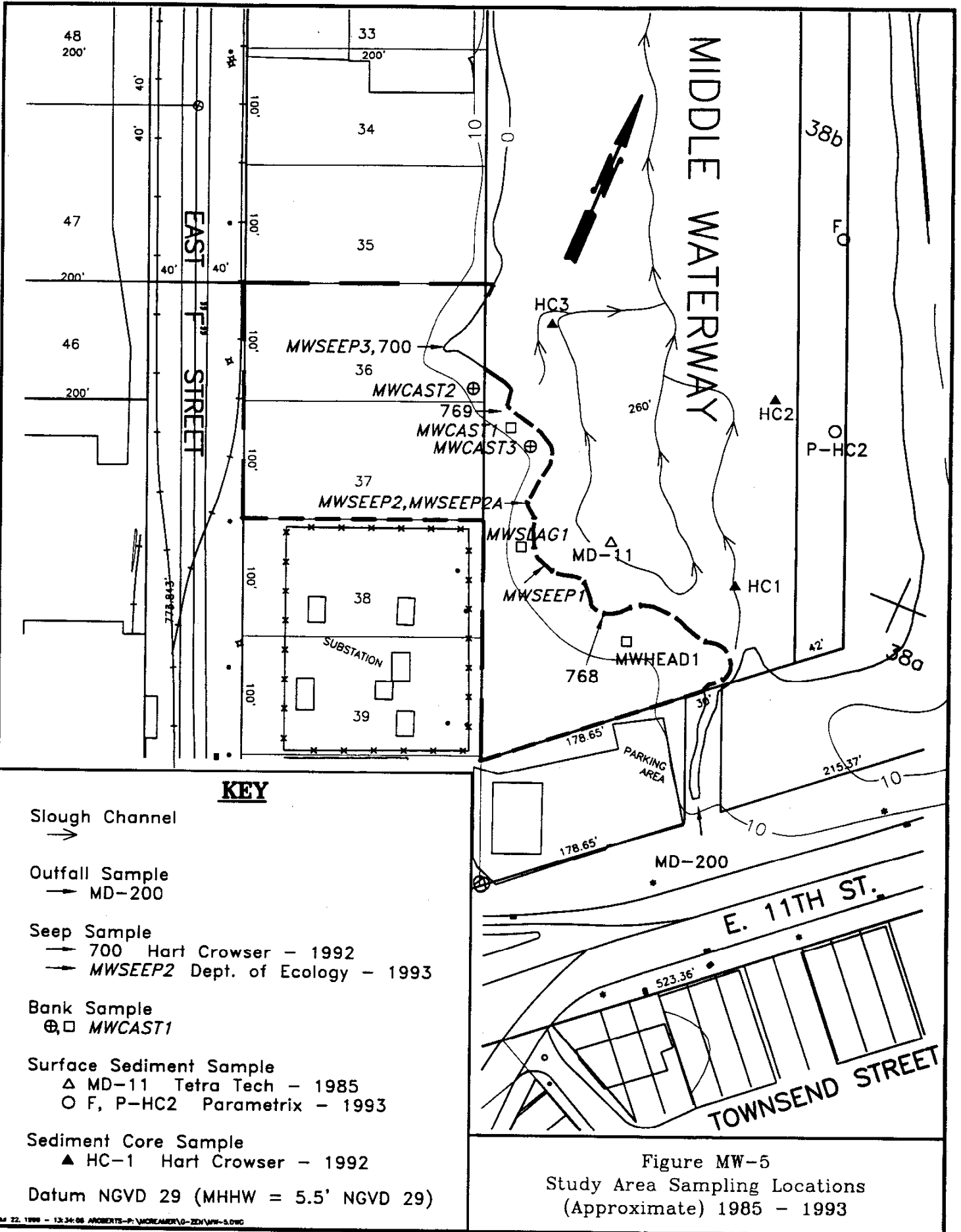
The City of Tacoma Public Works property is a 100' x 200' (0.45 acres) parcel that is presently vacant. The property is for the most part graded flat and partially graveled, except for the eastern quarter which slopes sharply to the intertidal mudflats of Middle Waterway. Property elevations range from approximately 10 ft NGVD29 on the western three fourths of the property to 0 feet in the tideflat area (i.e. 16 feet to 6 feet MLLW) on the eastern property boundary (Figure MW-2).

The property is dominated by an expanse of Himalayan blackberry (*Rubus discolor*) which extends from the central portion of the property to the property boundaries on the north and south and to the top of the slope on the east. Bank slopes are approximately 1:1 and are unvegetated to the intertidal mudflat.

Ecology staff (UBAT, 1993) sampled the seep and the bank area on this property (Figure MW-5 and Tables MW-2 & 4). Bank sediment samples were analyzed for priority organics (mwcast2), although analysis for total organic carbon was not undertaken. A number of exceedences of EPA SQOs were noted for the single sample analyzed for organics; as organic carbon data is not available, a comparison can not be made to state standards.

An undiluted seep sample (mwseep3) exceeded marine water quality criteria for copper and zinc.⁶ Flow rate data was not obtained. Hart Crowser (Hart Crowser, 1992) had previously sampled this same seep (Seep No. 700) and analyzed the sample for arsenic, copper, lead and zinc. The undiluted sample exceeded the marine water quality standards for copper; the measured seep flow rate was approximately 0.0002 cfs.

⁶40 CFR 131.36 (National Toxics Rule)



**TABLE MW-2
MIDDLE WATERWAY SEEP AND STORM DRAIN WATER QUALITY**

Study Station Name	Marine CMC	Marine CCC	Marine Consump.	Department of Ecology - 1993					Hart-Crowser - 1992			
				MW200	MWSEEP1	MWSEEP2	MWSEEP2A	MWSEEP3	MW-200	768	769	700
Metals (mg/kg)												
Antimony	69	36	0.14	30 U					30 U			
Arsenic	43	9.3 narrative	121	2 U	3.0 U			3 U	30	50 U	50 U	50 U
Cadmium	1100	50 narrative	2	2 U	2.0 U	3.0 U		28 U				
Chromium	2.9	2.9	6.5 U	30 U	35 U			21 U				
Copper	220	8.5 narrative	20	125	70			34	51	34	3	5
Lead	2.1	0.025	3.6 J	2.5 J	5 N			5.1 U	24 U	5 U	5 U	5 U
Mercury	75	8.3	4600	0.1 U	0.25 U	0.1 U		1 U	1 U	1 U	1 U	
Nickel	2.3			3 U	3.0 U	3 U						
Silver	95	86		30 U	84	30 U						
Zinc												
Beryllium			narrative	1 U	1.0 U	1 U						
Selenium	300	71 narrative		4 U	4.0 U	4 U						
Thallium			6.3	5 N	5.0 N	5 N						

Organics (ug/kg dry wt. except state standards are mg/kg total organic carbon)

HPAH												
Naphthalene												
Acenaphthylene												
Acenaphthene												
Fluorene												
Phenanthrene												
Anthracene												
2-Methylnaphthalene												
Total LPAH												
HPAH												
Flouranthrene												
Pyrene												
Benzo(a)anthracene												
Benzo(a)pyrene												
Chrysene												
Benzo(b)fluoranthene												
Benzo(k)fluoranthene												
Total Benzofluoranthenes												
Indeno(1,2,3-c-d-)pyrene												
Dibenzo(a,h)anthracene												
Benzo(g,h,i)perylene												
Total HPAH												

TABLE MW-2
MIDDLE WATERWAY SEEP AND STORM DRAIN WATER QUALITY

Study Station Name	Marine CMC	Marine CCC	Marine Consp.	MW200	Department of Ecology - 1993 MWSEEP1	MWSEEP2	MWSEEP2A	MWSEEP3	MW-200	Hart-Crowser - 1992 768	769	700
PCBs												
Total PCBs												
Chlorinated Hydrocarbons												
1,3-Dichlorobenzene												1.0 U
1,4-Dichlorobenzene												1.0 U
1,2-Dichlorobenzene												1.0 U
1,2,4-Trichlorobenzene												1.0 U
Hexachlorobenzene												1.0 U
Phthalates												
Dimethyl phthalate												1.0 U
Diethyl phthalate												0.25 J
Di-n-Butyl phthalate												0.1 J
Butylbenzyl phthalate												1.0 U
bis(2-Ethylhexyl) phthalate												1.0 U
Di-n-Octyl phthalate												1.0 U
Phenols												
Phenol												6.4
2-Methylphenol												1.0 U
4-Methylphenol												1.0 U
2,4-Dimethylphenol												1.0 U
Pentachlorophenol												5.1 U
Volatile Organics												
Trichlorethene												
Tetrachloethene												
Ethyl Benzene												
Xylenes												
Miscellaneous Compounds												
2-Nitrophenol												2.5 U
2-Chlorophenol												1.0 U
2,4-Dinitrophenol												10.1 U
2,4,5-Trichlorophenol												1.0 U
2,4,6-Trichlorophenol												1.0 U
4-Bromophenyl-phenylether												1.0 U
4-Nitrophenol												1.0 U
4-Chloro-3-Methylphenol												1.0 U

**TABLE MW-2
MIDDLE WATERWAY SEEP AND STORM DRAIN WATER QUALITY**

Study Station Name	Marine CMC	Marine CCC	Marine Consmpt.	Department of Ecology - 1993			Hart-Crowser - 1992		700
				MW200	MWSEEP1	MWSEEP2	MWSEEP2A	MWSEEP3	
4-6-Dinitro-2-Methylphenol									
Conventionals									
Discharge (cubic feet/sec)									
Dissolved Oxygen (mg/l)				0.0050	0.0001	0.01	0.0002		
Temperature (Degrees C)				6.2	5.7	6.1	7		
pH				19	20	17	19		
TDS (ppt)				6.9	6.8	7.2	7		
TSS (mg/l)				1.1	27	24	28		
				61	100	97	110		

Exceeds Water Quality CMC or CMC standard (established for the protection of aquatic life)
 Exceeds Water Quality Standard for Organism Consumption (human health-based standard)
 CMC = Criterion Maximum Concentration as per 40CFR 131.36
 CMC = Criterion Continuous Concentration as per 40CFR 131.36

- U = The analyte was not detected at or above the reported value.
- J = The associated numerical result is an estimated quantity.
- UJ = The analyte was not detected at or above the estimated value.
- N = There is evidence that the analyte is present.
- NJ or JN = There is evidence that the analyte is present. The associated numeric value is an estimate.
- P = The analyte was detected above the instrument detection limit but below the established minimum quantification limit.

8/8/94
MMWSEEP.XLS

**TABLE MW-3
MIDDLE WATERWAY STORM DRAIN SEDIMENT QUALITY**

Study Station Name	EPA SQO	Wash. SQS	Wash MCUL/CSL	Dept. of Ecology MW200SS-1993*	
Metals (mg/kg)					
Antimony	150			3	UJ
Arsenic	57	57	93	20.5	
Cadmium	5.1	5.1	6.7	1.2	P
Chromium		260	270	36.4	E
Copper	390	390	390	323	
Lead	450	450	530	201	E
Mercury	0.59	0.41	0.59	0.165	
Nickel	140			25.6	
Silver	6.1	6.1	6.1	0.7	PJ
Zinc	410	410	960	3	UJ
Beryllium				0.21	P
Selenium				0.4	U
Thallium				0.5	UJ
Organics (ug/kg dry wt.)		<i>Italicized state standards are mg/kg TOC</i>			
<u>LPAH</u>					
Naphthalene	2100	99	170	800	U
Acenaphthylene	1300	66	66	800	U
Acenaphthene	500	16	57	800	U
Fluorene	540	23	79	800	U
Phenanthrene	1500	100	480	250	J
Anthracene	960	220	1200	800	U
2-Methylnaphthalene	670	64	38	800	U
Total LPAH	5200	370	780		
<u>HPAH</u>					
Flouranthene	2500	160	1200	620	J
Pyrene	3300	1000	1400	510	J
Benzo(a)anthracene	1600	110	270	250	J
Benzo(a)pyrene	2800	99	210	130	J
Chrysene		110	460	270	J
Benzo(b)fluoranthene				340	J
Benzo(k)fluoranthene	3600			800	U
Total Benzofluoranthenes	1600				
Indeno(1,2,3,c-d)pyrene	690	34	88	120	J
Dibenzo(a,h)anthracene	230	12	33	800	U
Benzo(g,h,i)perylene	720	31	78	120	J
Total HPAH	17000	960	530		
<u>PCBs</u>					
Total PCBs	150	12	65		
<u>Chlorinated Hydrocarbons</u>					
1,3-Dichlorobenzene	170			800	U
1,4-Dichlorobenzene	110	9	3.1	800	U
1,2-Dichlorobenzene	50	2.3	2.3	800	U
1,2,4-Trichlorobenzene	51	0.81	1.8	800	U
Hexachlorobenzene	22	0.38	2.3	800	U
<u>Phthalates</u>					
Dimehtyl phthalate	160	53	53		
Diethyl phthalate	200	61	110	800	U
Di-n-Butyl phthalate	1400	220	1700	800	U
Butylbenzyl phthalate	900	4.9	64	800	U
bis(2-Ethylhexyl) phthalate	1300	47	78	3200	
Di-n-Octyl phthalate	6200	58	4500	800	U
<u>Phenols</u>					
Phenol	420	420	1200	800	U
2-Methylphenol	63	63	63	800	U
4-Methylphenol	670	670	670	800	U
2,4-Dimethylphenol	29	29	29	800	U

**TABLE MW-3
MIDDLE WATERWAY STORM DRAIN SEDIMENT QUALITY**

Study Station Name	EPA SQO	Wash. SQS	Wash MCUL/CSL	Dept. of Ecology MW200SS-1993*	
Pentachlorophenol	360	360	690	1900	U
<u>Volatile Organics</u>					
Trichlorethene	57				
Tetrachloethene	10				
Ethyl Benzene	40				
Xylenes					
<u>Miscellaneous Compounds</u>					
Benzyl Alcohol	73	57	73		
Benzoic Acid	650	650	650	800	U
Dibenzofuran	540	15	58	800	U
Hexachlorobutadiene		3.9	6.2	800	U
N-Nitrosodiphenylamine	11	11	11	800	U
Benzidine	28			800	U
bis(2-chloroethyl) Ether				800	U
bis(2-chloroethoxy) Methane					
Dimethyl-Nitrosomine					
Hexachlorobenzene				800	UJ
Hexachlorocyclopentadiene				800	U
Isophorone				800	U
Hexachloroethane				800	U
N-Nitrosodi-n-propylamine				800	U
Nitrobenzene				800	U
Phenanthrene					
1-Methylnaphthelene				800	U
2-Chloronaphthelene				800	U
2-Methylnaphthelene				1900	U
2-Nitroaniline				800	U
2,4-Dinitrotoluene					
2,6-Dinitrotoluene				1900	U
3-Nitroaniline				800	U
3,3'-Dichlorobenzidine				800	U
4-Chloroaniline				800	U
4-Chlorophenyl-phenylether				1900	U
4-Nitroaniline				800	U
2-Nitrophenol				1900	U
2-Chlorophenol				800	U
2,4-Dinitrophenol				1900	U
2,4,5-Trichlorophenol				800	U
2,4,6-Trichlorophenol				1900	U
4-Bromophenyl-phenylether				800	U
4-Nitrophenol				1900	U
4-Chloro-3-Methylphenol				800	U
4-6-Dinitro-2-Methylphenol				1900	U
<u>Pesticides</u>					
Carbazole				800	U

Exceeds EPA SQO or Washington State SQS
 MCUL = Minimum Cleanup Standard
 CSL = Cleanup Screening Level

- U = The analyte was not detected at or above the reported value.
- J = The associated numerical result is an estimated quantity.
- UJ = The analyte was not detected at or above the estimated value.
- N = There is evidence that the analyte is present.
- NJ or JN = There is evidence that the analyte is present. The associated numeric value is an estimate.
- P = The analyte was detected above the instrument detection limit but below the established minimum quantification limit.

* Total Organic Carbon was not analyzed; a review of TOC data in Foss storm drains (twin 96ers) show mean and median TOC values of 6-12% (drain 237A) and 2-6% (drain 237B). TOC data for discharges to Foss Waterway are not necessarily applicable to Middle Waterway and have not been used to normalize Middle Waterway dry wt.data.

**TABLE MW-4
MIDDLE WATERWAY BANK SEDIMENT CHEMISTRY**

Study Station Name	EPA SQO	Wash. SQS	Wash MCUL/CSL	Department of Ecology - 1993				
				MWHEAD1	MWFLAG1	MWCAST1	MWCAST2 *	MWCAST3 *
Metals (mg/kg)								
Antimony	150			15 UJ	46 PJ	3 UJ		
Arsenic	57	57	93	195 J	179 J	29.6 J		
Cadmium	5.1	5.1	6.7	5.7 PJ	2.5 PJ	1.0 UJ		
Chromium		260	270	110	355	18.2		
Copper	390	390	390	2440	3580	89.7		
Lead	450	450	530	415 J	1010 J	245 J		
Mercury	0.59	0.41	0.59	0.312 P	0.047 P	0.0757		
Nickel	140			121	315 J	23 J		
Silver	6.1	6.1	6.1	1.5 UJ	3.4 P	0.64 P		
Zinc	410	410	960	15 UJ	46 PJ	3 UJ		
Beryllium				0.5 U	0.5 U	0.16 P		
Selenium				0.68 J	0.4 U	0.4 N		
Thallium				0.5 U	0.5 U	0.5 U		
Organics (ug/kg dry wt.) <i>Italicized state standards are mg/kg TOC</i>								
<u>LPAH</u>								
Naphthalene	2100	99	170					
Acenaphthylene	1300	66	66			184 U	143 J	
Acenaphthene	500	16	57			184 U	51.9 J	
Fluorene	540	23	79			11 J	74 J	
Phenanthrene	1500	100	480			196	781	
Anthracene	960	220	1200			18 J	174 J	
2-Methylnaphthalene	670	38	64			27.8	55.9 J	
Total LPAH	5200	370	780					
<u>HPAH</u>								
Flouranthene	2500	160	1200			731	1110	
Pyrene	3300	1000	1400			749	819	
Benzo(a)anthracene	1600	110	270			1140	767	
Benzo(a)pyrene	1600	99	210			1800	358	
Chrysene	2800	110	460			2360	1080	
Benzo(b)fluoranthene						5150	1170	
Benzo(k)fluoranthene						1340	431	
Total Benzofluoranthenes	3600	230				6490	1601	
Indeno(1,2,3,c-d)pyrene	690	34	88			2990	331	
Dibenzo(a,h)anthracene	230	12	33			928	198 J	
Benzo(g,h,i)perylene	720	31	78			2630	215 U	
Total HPAH	17000	960	530			19818	6479	
<u>PCBs</u>								
Total PCBs	150	12	65					
<u>Chlorinated Hydrocarbons</u>								
1,3-Dichlorobenzene	170					184 U	215 U	
1,4-Dichlorobenzene	110	9	3.1			184 U	215 U	
1,2-Dichlorobenzene	50	2.3	2.3			184 U	215 U	
1,2,4-Trichlorobenzene	51	0.81	1.8			184 U	215 U	
Hexachlorobenzene	22	0.38	2.3					
<u>Phthalates</u>								
Dimethyl phthalate	160	53	53			461 U	537 U	
Diethyl phthalate	200	61	110			184 U	215 U	
Di-n-Butyl phthalate	1400	220	1700			184 U	215 U	
Butylbenzyl phthalate	900	4.9	64			45.2 J	66.7 J	
bis(2-Ethylhexyl) phthalate	1300	47	78			184 UJ	1430 UJ	
Di-n-Octyl phthalate	6200	58	4500			184 U	215 U	
<u>Phenols</u>								
Phenol	420	420	420			284 U	215 U	

**TABLE MW-4
MIDDLE WATERWAY BANK SEDIMENT CHEMISTRY**

Study Station Name	EPA SQO	Wash. SQS	Wash MCUL/CSL	Department of Ecology - 1993					
				MWHEAD1	MWLAG1	MWCAST1	MWCAST2 *	MWCAST3 *	
2-Methylphenol	63	63	63				461 U	537 U	
4-Methylphenol	670	670	670				184 U	215 U	
2,4-Dimethylphenol	29	29	29				184 U	215 U	
Pentachlorophenol	360	360	690				923 U	1070 U	
<u>Volatile Organics</u>									
Trichloroethene									
Tetrachloroethene	57								
Ethyl Benzene	10								
Xylenes	40								
<u>Miscellaneous Compounds</u>									
Benzyl Alcohol	73	57	73				184 U		
Benzoic Acid	650	650	650				923 U		
Dibenzofuran	540	15	58				33.4 J	60.9 J	
Hexachlorobutadiene	11	3.9	6.2				184 U	215 U	
N-Nitrosodiphenylamine	28	11	11				184 U		
Benzidine							231 U		
bis(2-chloroethyl) Ether							184 U	215 U	
bis(2-chloroethoxy) Methane							184 U	215 U	
Dimethyl-Nitrosomine							184 U		
Hexachlorobenzene							184 U	215 U	
Hexachlorocyclopentadiene							1840 U		
Isophorone							184 U		
Hexachloroethane							184 U		
N-Nitrosodi-n-propylamine									
Nitrobenzene							184 U		
Phenanthrene							196		
1-Methylnapthelene							18.1 J	52.3 J	
2-Chloronapthelene							184 U	215 U	
2-Methylnapthelene									
2-Nitroaniline							461 U		
2,4-Dinitrotoluene							461 U		
2,6-Dinitrotoluene									
3-Nitroaniline							184 U		
3,3'-Dichlorobenzidine							231 U		
4-Chloroaniline							184 U		
4-Chlorophenyl-phenylether									
4-Nitroaniline							184 U		
2-Nitrophenol							461 U		
2-Chlorophenol									
2,4-Dinitrophenol							1840 U	2150 U	
2,4,5-Trichlorophenol							184 U	215 U	
2,4,6-Trichlorophenol							184 U	215 U	
4-Bromophenyl-phenylether									
4-Nitrophenol							461 U	537 U	
4-Chloro-3-Methylphenol							184 U	215 U	
4-6-Dinitro-2-Methylphenol									
<u>Pesticides</u>									
Carbazole							184 U	527 J	
				Exceeds EPA SQO or Washington State SQS					

MCUL = Minimum Cleanup Standard SQS = Sediment Quality Standard
 CSL = Cleanup Screening Level SQO = Sediment Quality Objective
 U = The analyte was not detected at or above the reported value.
 J = The associated numerical result is an estimated quantity.
 UJ = The analyte was not detected at or above the estimated value.
 N = There is evidence that the analyte is present.
 NJ or JN = There is evidence that the analyte is present. The associated numeric value is an estimate.
 P = The analyte was detected above the instrument detection limit but below the established minimum quantification limit.
 * Not analyzed for Total Organic Carbon

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1.3.2 City of Tacoma/Public Utilities Property

This property within the study area is composed of a 100 x 200' upland adjacent to a utility substation (Figure MW-2). The lot is similar to the Public Works property in physical and biological characteristics (i.e., dominated by blackberry and otherwise graded flat and partially graveled), with the exception that the property is entirely upland. Environmental data on this property is lacking.

1.3.3 Department of Natural Resources Property

This property, approximately 0.8 acres in size, is located east of the City property and north of the Port Yacht Basin (Figure MW-2). The property is comprised of upland, intertidal bank and intertidal tideflat. The upland area, approximately 0.55 acres in size, is graded flat, partially graveled and largely devoid of vegetation except for the area adjacent to the top of the slope, where blackberries, grasses, shrubs and an apple tree are found. Slag or foundry waste, concrete and asphalt debris are evident in the bank areas. Bank slopes range from steep (1:1) to moderate (2:1 and grading to 5:1). *Salicornia virginica* and *Plantago maritima* are present in intertidal areas where natural sediments exist.

Ecology staff (UBAT, 1993) sampled the seeps and the bank area on this property (Table MW-2 and 4 and Figure MW- 5). Three sediment samples were analyzed for priority metals (mwhead1, mwslag1, mwcast1) and a third for organics (mwcast3). Two of the samples analyzed for metals exceeded EPA Sediment Quality Objectives (SQOs) or Washington State Sediment Quality Standards (SQSs) - arsenic, cadmium and copper in mwhead1 and arsenic, chromium, copper, lead and nickel in mwslag1. The sample analyzed for organic compounds (mwcast3) did not exceed EPA SQOs; as organic carbon data was not obtained, a comparison against state standards cannot be made.

Three samples were also collected from seeps (mwseep1, mwseep2, mwseep2a) on the property. Undiluted samples exceeded marine water quality standards for copper in the two samples that were analyzed for metals (mwseep1 and mwseep2). Organic compounds were generally not detected in the third sample, analyzed for organics only, except for phenol (6.4 ppb) and two phthalate compounds estimated to be in the sample at 0.6 and 0.1 ppb. Water quality standards for these three compounds have not been adopted by the state or by the federal government for the state.⁷

⁷Chapter 173-201A WAC (Water Quality Standards for Surface Waters of the State of Washington); Chapter 173-340 (Model Toxics Control Act Cleanup Regulation); and 40 CFR 131.36 (National Toxics Rule).

1.3.4 Port (Pacific) Yacht Basin

Only the most eastern ten to twenty feet of this property is within the study area; this portion of the property slopes steeply from the fence line to tideflat below. The bank/intertidal area is characterized by fill, concrete rubble, grasses, shrubs, *Salicornia virginica* and *Plantago maritima*.

This 0.75 acre property above the portion within the study area is covered by a concrete slab. A building which houses a small marine engine repair shop is situated on the west side of the property and power boats are stored within a fenced area on the east side of the property.

A City of Tacoma storm drain discharges to the waterway immediately adjacent to this property. The existing water and sediment quality data for this drain is presented in Tables MW-2 and MW-3.

1.3.5 Adjacent Tideflats

The tideflat adjacent to and within the study area is one of the largest contiguous tracts of mudflat habitat in the Commencement Bay/Puyallup River Estuary. The waterway is approximately 27 acres in extent, most of which is intertidal mudflat. As there is less than 200 acres of this habitat remaining in the estuary, out of approximately 2000 original mudflat acres, the tract in Middle Waterway is significant. Tideflats in the vicinity are generally sandy with typically 54% fine-grained material, and include a clay content of approximately 12% (David Evans and Associates 1993).

Past sampling in the waterway near the project site has shown metals and organic chemicals, principally mercury and PAHs, present in tideflat surface sediments (Parametrix 1988a, 1993a,b; US EPA 1989; Hart Crowser, 1992). Organic chemical concentrations are lower in the top 0-1 ft than in deeper sediments (1-3 ft), suggesting that the PAH contamination is primarily the result of historical activities (Hart Crowser, 1992).

Figure MW-5 depicts approximate sampling locations of prior studies and Table MW-5 presents a summary of the data. Data is presented on a dry weight basis and normalized to total organic carbon where carbon data is available. Organic carbon data utilized in the normalization may be outside of the range of organic carbon values utilized in the Department of Ecology's normalized Sediment Quality Data Base. (McMillan, Dept. of Ecology).

Tetra Tech 1985/1988

Tetra Tech, as part of the Commencement Bay Nearshore Tide/Flats Remedial Investigation (Tetra Tech 1985), conducted a preliminary and a final survey. During the preliminary study, sediment was sampled at one station, MD01, located in the middle of the waterway, at which elevated levels of mercury were detected. Aromatic hydrocarbons were also detected, although at lower concentrations than observed in later studies, during which samples were taken closer to

MIDDLE WATERWAY TIDEFLAT SEDIMENT CHEMISTRY

Study Station Name (Depth - cm/ft)	EPA SOO	State SOS	State MCLUCS1	MW-1 0-2 cm	Parametix 1993 P-HC-2 0-2 cm	Reference 0-2 cm	HC-1/S-1 0-1 ft	HC-1/S-2 1-2 ft	HC-1/S-3 2-3 ft	HC-2/S-1 0-1 ft	Hart Crowser 1992 HC-2/S-2 1-2 ft	HC-2/S-3 2-3 ft	HC-3/S-1 0-1 ft	HC-3/S-2 1-2 ft	HC-3/S-3 2-3 ft	Parametix 1998 MW-1 0-1 ft	Parametix 1998 MW-1 1-2 ft	RI-1985 MD-11
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Metals (mg/kg)																			
Antimony	150																		
Arsenic	57	57	93																
Cadmium	5.1	5.1	6.7																
Copper	390	390	390																
Lead	450	450	530																
Mercury	0.59	0.41	0.59	0.31	0.59														
Nickel	140				118														
Silver	6.1	6.1	6.1																
Zinc	410	410	960																

Organics (µg/kg dry wt.)																			
LPAH																			
Naphthalene	2100			27	37	150	20 U	1800 D	88000 D	130000 D	930 D	540 D	89 J	220 J	290	65 J	240	590	2800
Acenaphthylene	1300			14	41	94	26	1200 D	35000 U	34000 U	4500 U	2500 U	320 U	98 J	130 J	300 U	130	540	530
Acenaphthene	500			12 U	35	340	20 U	2300 D	250000 D	540000 D	1300 U	820 U	91 U	98 U	190	32 J	74	130	350
Fluorene	540			13	30	250	29	1100 D	54000 D	94000 D	350 D	300 D	120	99	160	12 J	63	280	410
Phenanthrene	1500			120	300	4000 K	220	4100 D	180000 D	280000 D	2400 D	1700 D	480 D	670 D	780 D	71	930	2000	2100
Anthracene	960			23	75	470	85	1300 D	48000 D	83000 D	380 D	530 D	180	190	310	16	210	750	440
2-Methylnaphthalene	670			12 U	19	83	20 U										42	10	910
Total LPAH	5200			221	537	5387	420	11800	656000	1E+06	9860	6790	1280	1375	1870	496	1689	4300	7640

HPAH																			
Flouranthene	2500			280	3000 K	3200 K	2000	4100 D	55000 D	96000 D	2800 D	2300 D	590	1200 D	1100 D	61	1300	3800	2800
Pyrene	3300			170	1700 K	4800 K	680	16000 D	370000 D	620000 D	8300 D	7800 D	1800 D	3500 D	3700 D	430	1800	6000	2900
Benzofluoranthene	1600			120	970	1800 K	510	4300 D	48000 D	88000 D	2700 D	2400 D	600 D	1300 D	1300 D	110	810	2400	1200
Chrysene	2800			180	1500 K	2400 K	1100	3200 D	16000 D	31000 D	2200 D	1700 D	140	960 D	880 D	17	900	2600	1500
Benzofluoranthenes	100			100	850 K	1200 K	720												
Benzofluoranthene	3600			300	1650	2000	830	4390 D	359880 D	65100 D	2810 D	2120 D	1101 D	1410 D	1143 D	5 U	1100	4700	1600
Benzofluoranthene	1600			120	940	1800 K	370	2400 D	24000 D	44000 D	1500 D	1200 D	220	750 D	650 D	26	710	4100	1600
Indeno[1,2,3-cd]pyrene	680			67	320	430	160	1300 D	10000 D	15000 D	870 D	740 D	94	480 D	380 D	58	210	2900	710
Dibenzofluoranthene	230			24	140	190	55	68 U	680 U	660 U	580 D	360 D	6 U	7 U	6 U	6 U	130	780	140
Benzofluoranthene	720			62	280	400	140	1200 D	6600 D	9900 D	820 D	730 D	110	390	300	6 U	130	3400	740
Total HPAH	17,000			1303	10500	17020	6575	36958	567280	989660	22680	19350	4661	9997	9469	720	6830	30680	740

PCBs																			
Total PCBs	150																		

Chlorinated Hydrocarbons																			
1,3-Dichlorobenzene	170																		
1,4-Dichlorobenzene	110																		
1,2-Dichlorobenzene	50																		
1,2,4-Trichlorobenzene	51																		
Hexachlorobenzene	22																		

TABLE MW-5
MIDDLE WATERWAY TIDEFLAT SEDIMENT CHEMISTRY

Study Station Name (Depth - cm)	EPA SQO	State SQS	State MCULCSL	MMW-1 0-2 cm	Parameterix 1983 F P-HC-2 0-2 cm	Reference 0-2 cm	HC-1/S-1 0-1 ft	HC-1/S-2 1-2 ft	HC-1/S-3 2-3 ft	Hart Crowser 1992 HC-2/S-1 0-1 ft	HC-2/S-2 1-2 ft	HC-2/S-3 2-3 ft	HC-3/S-1 0-1 ft	HC-3/S-2 1-2 ft	HC-3/S-3 2-3 ft	Parameterix 1988 MMW-1 0-1 ft	MMW-1 1-2 ft	RI-1985 MD-11
Phthalates																		
Dimethyl phthalate	160																	50 U
Diethyl phthalate	200																	10 U
Di-n-Butyl phthalate	1400																	1702
Butylbenzyl phthalate	900																	25 U
Is(2-Ethylhexyl) phthalate	1300																	1200
Di-n-Octyl phthalate	6200																	25 U
Phenols																		
Phenol	420	420	1200															850
2-Methylphenol	63	63	63															88
4-Methylphenol	670	670	670															620
2,4-Dimethylphenol	29	29	29															10 U
Pentachlorophenol	360	360	690															620
Volatile Organics																		
Trichlorethene																		
Tetrachlorethene	57																	
Ethyl Benzene	10																	
Xylenes	40																	
Miscellaneous Compounds																		
Benzyl Alcohol	73	57	73															47
Benzoic Acid	650	650	650															25 U
Dibenzofuran	540																	440
Hexachlorobutadiene	11																	25 U
N-Nitrosodiphenylamine	28																	50 U
Hexachloroethane																		
Pesticides																		
Total DDT	16																	50 U
DDD	9																	50 U
DDE	34																	50 U
DDT																		50 U
Aldrin																		50 U
Chlordane																		50 U
Diieldrin																		50 U
Heptachlor																		50 U
Lindane																		50 U
Conventionalals																		
Total solids (%)	66.59	41.56	39.17	39.5														
Total Vol. Solids (%)	2.25	2.47	4.12	4.29			7.5	6.4	4	9.9	3.5	3.1	5.6	2.6	3.7			
TOC (% dry wt.)	348	158	2.33 U	64.9														
Ammonia (mg/kg)																		
Total Sulfides	15	46	65	54														
Fines (%)																		

TABLE MW-5
MIDDLE WATERWAY TIDEFLAT SEDIMENT CHEMISTRY

Study Station Name (Depth, cm)	EPA SCO	State SQS	State MCL/CLSL	Parameter 1993		Reference		Hart Crowser 1992			Parameter 1998			RI-1985 MID-11	
				MW-1 0-2 cm	F P-HC-2 0-2 cm	MW-1 0-2 cm	HC-1/S-1 0-1 ft	HC-1/S-2 1-2 ft	HC-1/S-3 2-3 ft	HC-2/S-1 0-1 ft	HC-2/S-2 1-2 ft	HC-2/S-3 2-3 ft	MW-1 0-1 ft		MW-1 1-2 ft
Organics (mg/kg total organic carbon)															
HPAH															
Naphthalene	99	170	1.2	1.5	3.6	0.5 U	24 D	137.5 D	47.50 D	9.4 DJ	15.4 DJ	2.9 J	3.9 J	11.2	1.8 J
Acenaphthylene	66	66	0.6	1.7	2.3	0.6	16 D	546.88 U	850 U	45.5 U	82.9 U	10.3 U	1.8 J	5.0 J	8.1 U
Acenaphthene	16	57	0.5 U	1.4	8.3	0.5 U	31 D	3908.3 D	13500 D	13.1 U	23.4 U	2.9 U	1.8 U	7.3	0.9 J
Fluorene	23	79	0.6	1.2	6.1	0.7	15 D	843.75 D	2350 D	3.5 D	8.6 D	3.9	1.8	6.2	0.3 J
Phenanthrene	100	480	5.3	12.1	97.1 K	5.1	55 D	2812.5 D	7250 D	24.2 D	48.6 D	15.5 D	12.0 D	30.4 D	1.9
Anthracene	220	1200	1.0	3.0	11.4	2.0	17 D	765.63 D	2075 D	3.8 D	15.1 D	5.8	3.4	11.9	0.4
2-Methylnaphthalene	38	64	0.5 U	0.8	2.0	0.5 U									
Total LPAH	370	780	10	21.7	130.8	9.8	157.3	10250	30775	99.6	194.0	41.3	24.6	71.9	13.4
HPAH															
Flouranthene	160	1200	11.6	121.5 K	77.7 K	46.6	55 D	859.38 D	2400 D	28.3 D	65.7 D	19.0	21.4 D	42.3 D	1.6
Pyrene	1000	1400	7.6	68.8 K	116.5 K	16.1	213 D	5781.3 D	15500 D	83.8 D	222.9 D	58.1 D	62.5 D	142.3 D	11.6
Benzo(a)anthracene	110	270	5.3	39.3	43.7 K	11.9	57 D	765.63 D	2200 D	27.3 D	68.6 D	19.4 D	23.2 D	50.0 D	3.0
Chrysene	110	460	8.0	60.7 K	58.3 K	25.6	43 D	250 D	775 D	22.2 D	48.6 D	4.5	17.1 D	34.2 D	0.5
Benzo(b)fluoranthenes			4.4	34.4 K	29.1 K	16.8									
Benzo(k)fluoranthenes			8.9	32.4	19.4	19.3									
Benzofluoranthenes	230	450	13.3	66.8	48.5	36.1	59 D	562.19 D	1627.5 D	28.4 D	60.6 D	35.5 D	25.2 D	44.0 D	0.1 U
Benzo(a)pyrene	99	210	5.3	38.1	43.7 K	8.6	32 D	375 D	1100 D	15.2 D	34.3 D	7.1	13.4 D	25.0 D	0.7
Indeno(1,2,3-cd)pyrene	34	88	3.0	13.0	10.4	3.7	17 D	156.25 D	375 D	9.8 D	21.1 D	3.0	8.6 D	14.8 D	1.6
Dibenz(a,h)anthracene	12	33	1.1	5.7	4.6	1.3	1 U	11 U	16.5 U	5.9 D	10.3 D	0.2 U	0.1 U	0.2 U	0.2 U
Benzzo(g,h,i)perylene	31	78	2.8	11.3	9.7	3.3	16 D	103.13 D	247.5 D	8.3 D	20.9 D	3.5	7.0	11.5	0.2 U
Total HPAH	960	5300	57.9	425.1	291.1 K	153	493	8863.4	24242	229	553	150	179	364	19

Exceeds applicable EPA Sediment Quality Objective or State Sediment Quality Standard
 Not detected at a level above applicable EPA Sediment Quality Objective or State Sediment Quality Standard

- U = The analyte was not detected at or above the reported value.
- J = The associated numerical result is an estimated quantity.
- UI = The analyte was not detected at or above the estimated value.
- N = There is evidence that the analyte is present.
- NI or NI = There is evidence that the analyte is present. The associated numeric value is an estimate.
- P = The analyte was detected above the instrument detection limit but below the established minimum quantification limit.
- K = Quantitative Value above calibration curve. Sample was diluted, resulting values are reported.
- D = Sample Dilution Required
- RI: 1985 Remedial Investigation, Tetra Tech, Inc. for EPA

the project site. Total PCBs were detected at 3 ppb and pesticides were not detected above 10 ppb (Parametrix, 1994).

Data collected during the final survey detected a number of chemicals of concern at station MD-11, located adjacent to the project site. Contaminants or groups of contaminants exceeding EPA's Sediment Quality Objectives (EPA SQOs) include aromatic hydrocarbons, phenols, chlorinated hydrocarbons and di-n-butyl phthalate (Table MW-5). Pesticides were not detected, although detection limits were above Sediment Quality Objectives.

Parametrix 1988/1993

Parametrix conducted several studies for Simpson Tacoma Kraft on the east side of the waterway beginning with environmental assessment work related to purchase of property adjacent to the waterway in 1988 and culminating with habitat pre-construction data collected as part of Corps of Engineers Section 10/404 permitting requirements. Mercury and aromatic hydrocarbon values exceeded EPA SQOs and State Standards. When normalized to carbon, organics generally do not exceed State Sediment Quality Standards. Two of four samples have organic carbon values within the range of carbon values utilized to develop state standards; the third and fourth values, at stations P-HC-2⁸ and the reference station, are at the outer limit of the range of carbon values used in the Ecology AET data base.

Samples at the three Parametrix stations established in 1993 (MW-1, F and P-HC-2) were analyzed using standard sediment bioassay procedures. The sediments at all three stations passed the acute amphipod and the chronic *Neanthes* biomass tests, but did not pass an acute sediment larval bioassay using the Pacific oyster (*Crassostrea gigas*). The reference sediment used for the bioassay work was obtained from the Hylebos Waterway just north of 11th Street. (Figure MW-6).

Hart Crowser 1991, 1992

Hart Crowser investigated historical contamination and potential sources in Middle Waterway under contract to Foss Maritime and Simpson Tacoma Kraft Co. in 1991, and conducted additional investigatory work the following year, 1992. Three stations established in that study are in the head of the waterway near the restoration study area. Stations HC-1, 2 & 3 were sampled by Hart Crowser to a depth of three feet using hand-driven impact cores (Figure MW-5).

⁸This station is immediately adjacent to station HC-2, a station established by Hart-Crowser. Parametrix's station HC-2 is here referred to as P-HC-2 in order to differentiate it from the original station.

No exceedences of EPA SQOs or State Standards for metals were noted except for a single exceedence for mercury at HC-1, on the east side of the waterway. Samples at that station also exceeded EPA SQOs for PAHs, and State SQS in samples taken at the one-two and two-three foot intervals. The upper most foot did not exceed State SQSs, but the total organic compound concentration (7.5%) is apparently outside of the range used to develop state standards. Sample HC-3, in the vicinity of the north end of the study area, did not exceed state or EPA standards for metal or organics. Sample HC-2, furthest from the study area of the three Hart Crowser samples, exceeded EPA SQOs for organics in the two upper most feet of depth but did not exceed State Standards. Organic carbon values are roughly in the range of that utilized in standard development, although the upper most foot is slightly enriched. Hart Crowser concluded that contamination generally increased with depth and was apparently the result of historical activities.

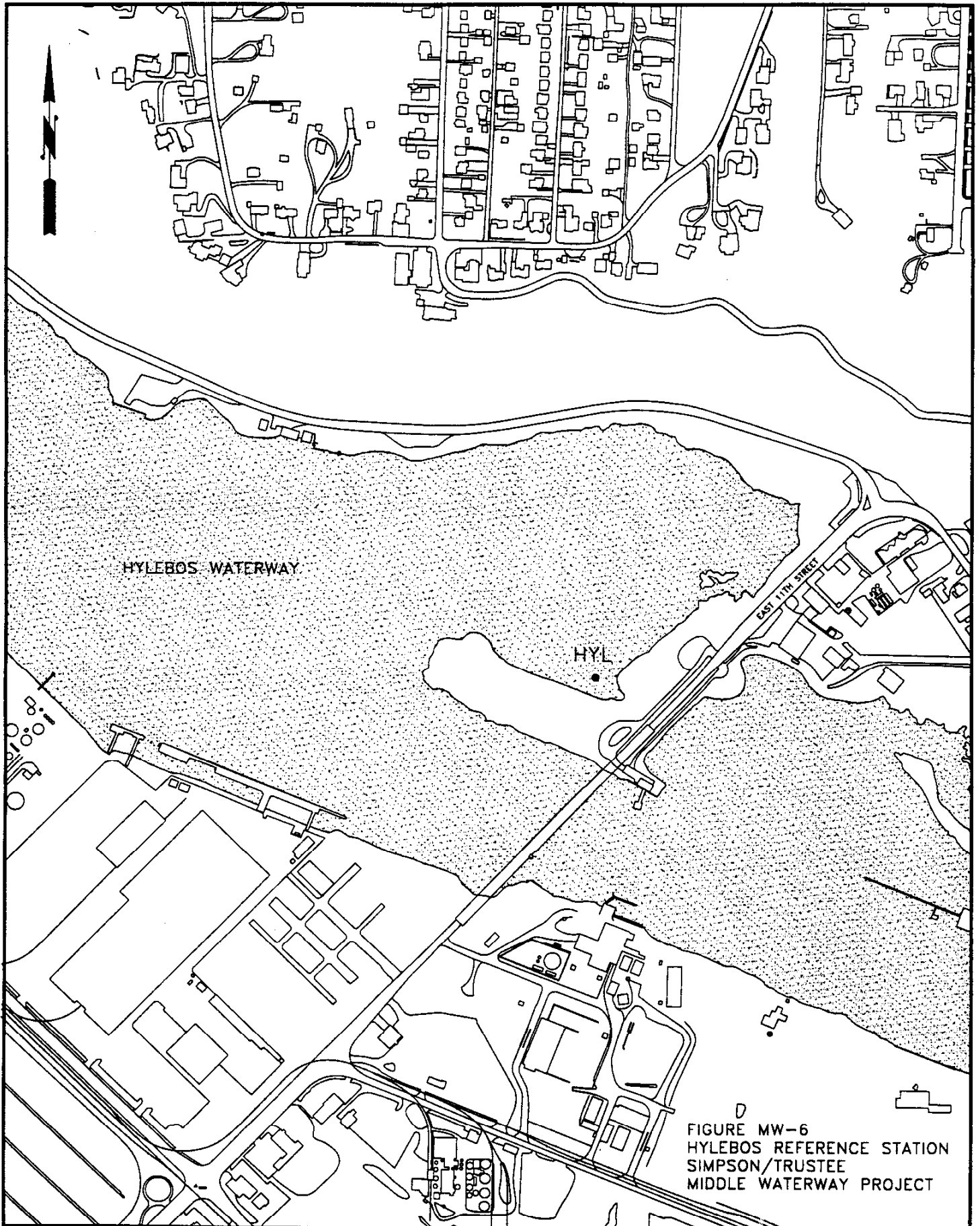


FIGURE MW-6
HYLEBOS REFERENCE STATION
SIMPSON/TRUSTEE
MIDDLE WATERWAY PROJECT

SAMPLING AND ANALYSIS PLAN **(June 1995 reprint)**

2.0 OVERVIEW

The objective of this Sampling and Analysis Plan (SAP) is to determine the suitability of properties within the study area for intertidal habitat restoration and enhancement under Commencement Bay EPA Sediment Quality Objectives, 404(b)(1) guidelines, 401 WQC review, and WAC 173-204 (Washington State Sediment Management Standards). After review of regulatory guidelines, tasks were identified to characterize the restoration project site based upon generalized restoration plans involving the removal of material to a depth of approximately 10 or 11 feet MLLW and, possibly, filling for habitat enhancement in existing intertidal areas. Tasks include the following:

- o Develop a sampling and analysis plan (SAP) that is consistent with EPA Contract Laboratory and PSEP protocols and state and federal programmatic requirements.
- o Coordinate with the Department of Ecology, EPA, the Corps of Engineers and other resource agencies to select appropriate reference sediments for biological testing.
- o Conduct field operations at Middle Waterway and collect sediment samples as specified in this SAP.
- o Submit the composite representative sediment samples to the City Laboratory. Grain size and conventional analyses will be analyzed within seven days and other analyses will be completed within 28 days. Information from the grain size and conventional analyses are needed before bioassay testing can begin.
- o Submit the composite representative sediment samples for biological testing to a laboratory experienced in the performance of biological testing as defined by Puget Sound Estuary Program (PSEP) Protocols.
- o Review the analytical data for consistency with Department of Ecology Sediment Management Standards (SMS) requirements and to assure data quality. After QA/QC, identify sediment analyte levels above the Sediment Quality Standards (SQS, MCULs, CSLs).
- o Review analytical results and determine, in consultation with regulating agencies, if any additional samples will be submitted for biological testing.
- o Review biological data to assure data quality, and interpret the results in accordance with Department of Ecology interpretive criteria.

- o Manage the field, analytical, and biological data in a manner consistent with EPA CLPs and PSEP protocols and Department of Ecology requirements.
- o Deliver a report to the Department of Ecology, EPA, the US Corps of Engineers and the Natural Resource Trustee agencies that is consistent with the various sediment management program requirements pertaining to the collection and reporting of the field, analytical, and biological data.

2.1 SUMMARY OF PROPOSED SAMPLING AND ANALYSIS

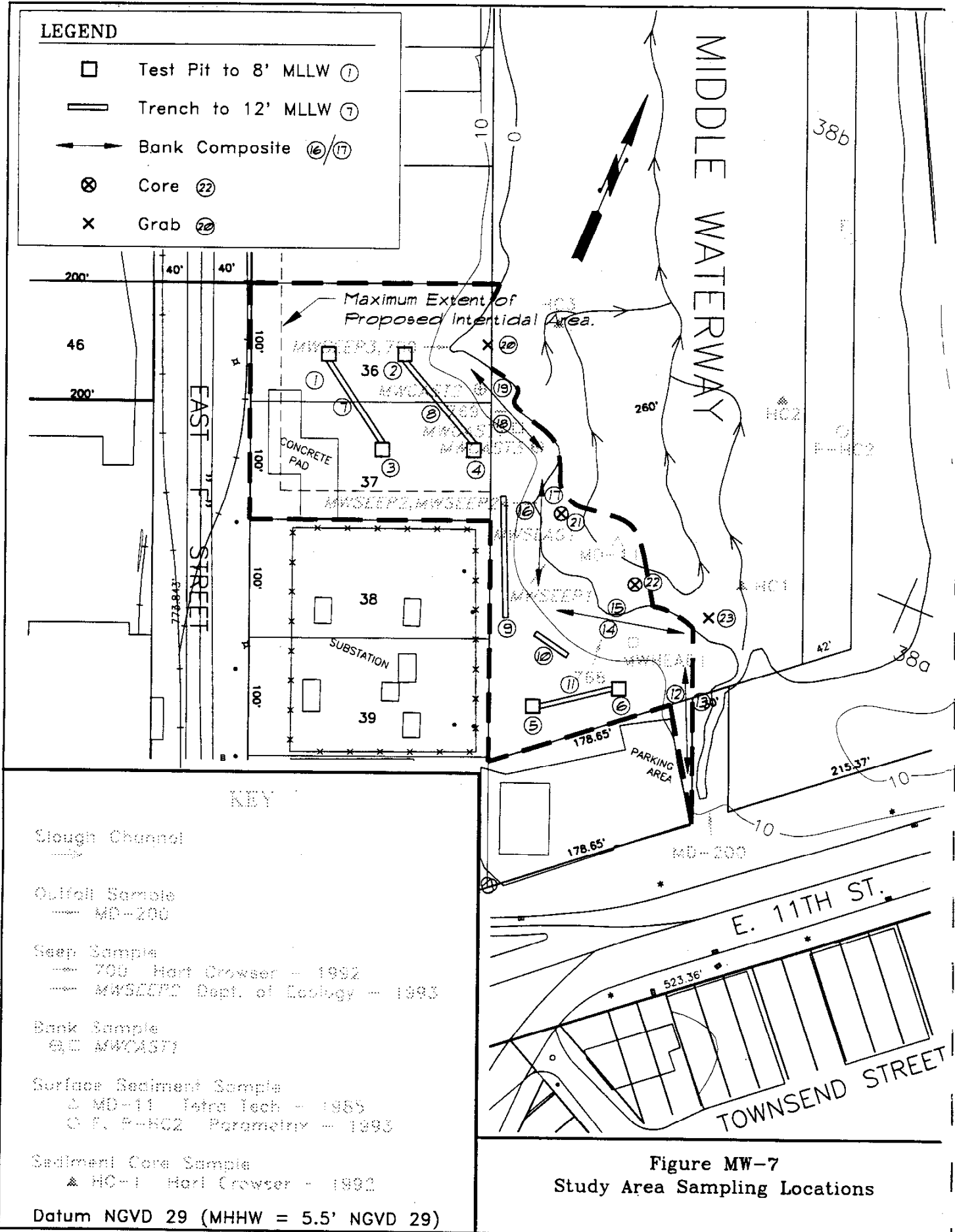
The City is proposing to sample at a fourteen locations in the study area (Figure MW-7) . The City would sample for physical/chemical analysis:

1. Six test pits in upland areas, including two on DNR property and four on City property. Test pit sampling is designed to characterize material in the horizons (8-10 ft MLLW and 10-12 ft. MLLW) bracketing the future intertidal surface in order to ascertain the suitability of the materail in this horizon for conversion, via removal of overburden, to intertidal habitat. Two samples will be obtained from each test pit on DNR property in two foot vertical sections ("lifts") immediately above and below the expected future intertidal grade (Figure MW-8). Two samples will similarly be obtained from each test pit on City property. Samples from adjoining test pits at equal elevations on City property will be combined to create a total of four composite samples. The resulting four discrete samples (DNR) and four composite samples (City) will be submitted to the City laboratory for physical-chemical analysis (Table MW-6).
2. Five trenches in upland areas; trench sampling will be used to characterize soils in the 12-18 ft. MLLW horizon. This overburden material will be excavated and removed during project construction and data collected by the City will be used to define soil disposal options. A composite sample will be obtained from each trench in order to characterize soils for disposal during project construction. The five composite samples will be submitted to the City laboratory for physical-chemical analysis.
3. Bank areas. Bank sampling will be used to characterize the material evident in the bank, in strata that is obviously contaminated and in strata below the contaminated material in which contamination is not evident. Sampling of these two bank strata will be used, in conjunction with pit and trench sampling, to characterize the extent of on site contamination. One composite sample will be taken from each of four 150 foot sections of bank area in obviously contaminated strata. One composite sample will also be taken from each of four 150 foot sections of bank in the apparently uncontaminated material below the contaminated strata. The resulting eight composite samples will be submitted to the City laboratory for physical-chemical analysis.
4. Tideflat samples. Two cores will be taken, and samples will be obtained from each core at 0-10 cm, 1-2 foot and 2-3 foot depths. Two additional surface samples will also be obtained. The resulting eight discrete samples will be submitted to the City laboratory for physical-chemical analysis. The City would also collect sufficient surface sediment at each tideflat station to

undertake biological analysis of tidelflat sediment samples. Analysis will consist of benthic community structure evaluation and performance of a standard suite of sediment bioassays as outlined in state sediment management guidance (Microtox, amphipod, sediment larvae - echinoderm embryo) plus a second chronic test (juvenile polychaete) in order to provide a more complete biological assessment of tidelflats in the vicinity of the project. Core and grab samples in the tidelflats will be used to better define the nature of the surrounding aquatic environment. These samples in essence provide context for restoration planning at the project site.

LEGEND

- Test Pit to 8' MLLW ①
- ▬ Trench to 12' MLLW ⑦
- ↔ Bank Composite ⑬/⑰
- ⊗ Core ⑳
- × Grab ㉔



Slough Channel
→

Outfall Sample
— MD-200

Seep Sample
— 700 Hart Crowser - 1992
— MWSECEC Dept. of Ecology - 1993

Bank Sample
⊗ MWCAS77

Surface Sediment Sample
△ MD-11 Tetra Tech - 1985
○ E. F-HC2 Parametrix - 1993

Sediment Core Sample
▲ HC-1 Hart Crowser - 1992

Datum NGVD 29 (MHHW = 5.5' NGVD 29)

Figure MW-7
Study Area Sampling Locations

MIDDLE WATERWAY
 PROPOSED SAMPLING STATIONS
 CROSS SECTION

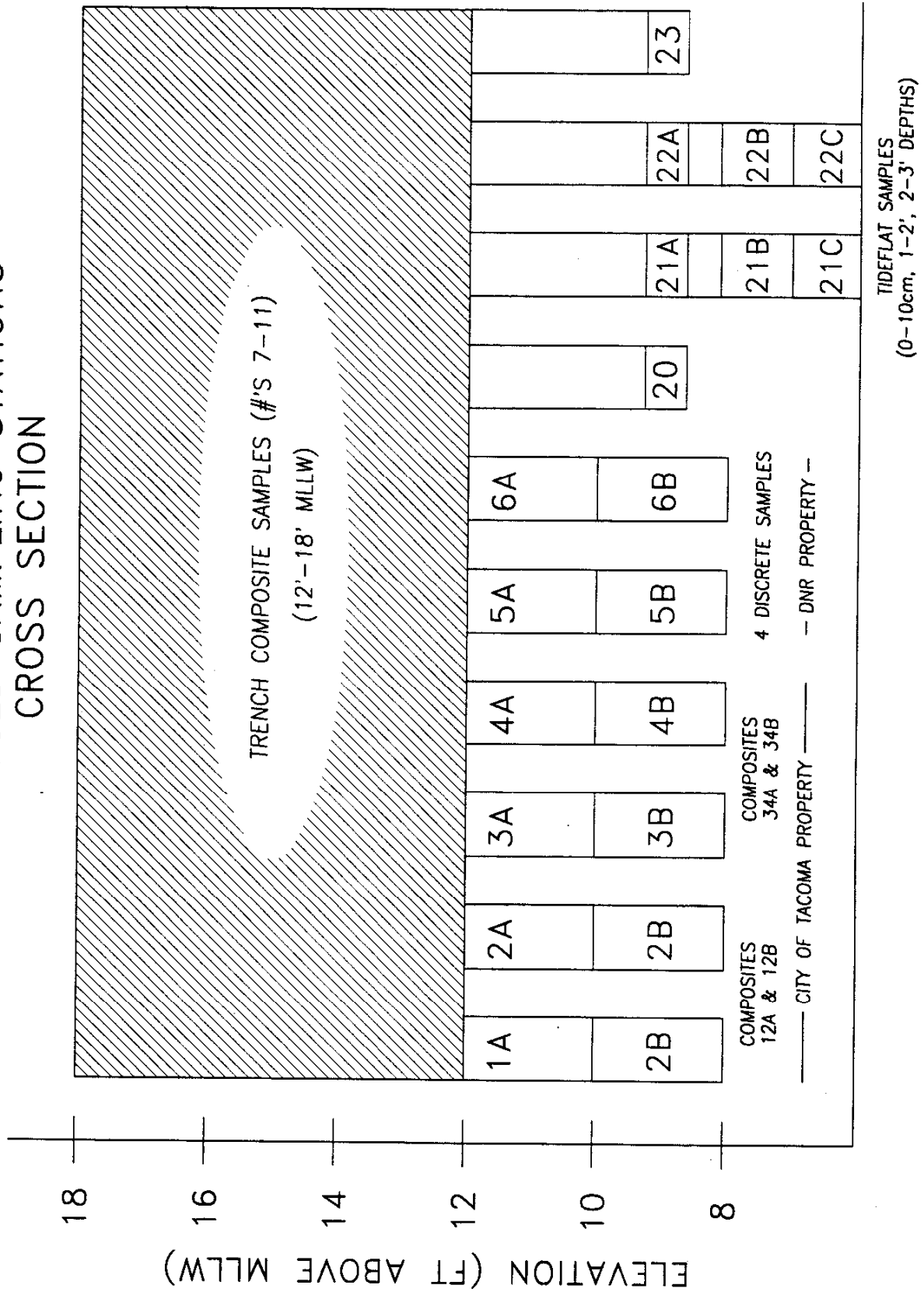


FIGURE MW-8

3.0 PROJECT TEAM AND RESPONSIBILITIES

Successful completion of the sampling and analysis requires coordination and adherence to the SAP and QA/QC procedures. Staffing and responsibilities are outlined below. Project personnel will consult with the regulating agencies should any of items described in Appendix A (Issues of Concern) be encountered during of the study.

3.1 PROJECT PLANNING AND COORDINATION

Project coordination is the responsibility of Greg Zentner of the Utility Services Engineering Division, Public Works Department and Chris Getchell of the City Of Tacoma Laboratory. Mr. Zentner is the primary project contact. The sampling and analysis program (SAP) was developed by City staff in consultation with Dr. Donald Weitkamp and staff at Parametrix.

3.2 FIELD SAMPLE COLLECTION

City personnel will be responsible for the collection of the sediment samples. The field team will consist of Mr. John O'Loughlin (City Laboratory) and Mr. Zentner and other personnel under their direction, with assistance provided by professional staff of Parametrix for the geologic mapping of on-site conditions. Mr. O'Loughlin will work closely with Mr. Getchell to ensure consistency with all QA/QC items listed in Section 4.0. City staff will collect the samples and record the necessary data on those samples. They will composite and homogenize the subsamples into samples as described in Section 4.0, and prepare the samples for shipment to the appropriate biological laboratory.

3.3 PHYSICAL/CHEMICAL ANALYSES

The composite sediment samples will be submitted to the City of Tacoma Laboratory. Mr. Christopher Getchell will provide oversight of the analytical laboratories, ensuring strict adherence to the procedures and detection limits defined in the this SAP. Ms. Judith Murray of the City Laboratory will perform the QA/QC analysis of the data. The data will be assembled into tabular format, and compared to appropriate regulatory standards. The results of the analyses will be included as part of the final data report. A list of parameters to be analyzed and analytical methods is included in this report as Table MW-6.

3.4 BIOLOGICAL ANALYSES

Biological testing will occur under the direction of Mr. Getchell at an outside laboratory in accordance with PSEP protocols. Reference sample collection will be coordinated with the regulatory agencies. The results of the analyses will be included as part of the final data report.

3.5 QA/QC MANAGEMENT

Mr. Getchell will provide a final QA review for the sediment characterization project. This includes the review of the analytical and biological data for accuracy and omissions, review of the field data and collection procedures for adherence to the sampling plan, and a review of the final report for accuracy of interpretation.

3.6 FINAL DATA REPORT

Mr. Zentner will be responsible for assembling the final sediment characterization report describing sample locations and depths; sampling, handling, and analytical methods; QA/QC; and data results. He will be assisted by Mr. Getchell.

4.0 SAMPLE COLLECTION AND HANDLING PROCEDURES

4.1 SAMPLING AND COMPOSITING OVERVIEW

Samples will be collected from six test pits and five trenches in upland areas, four reaches of bank in the intertidal, ands, two cores and two grab stations the tideflat area. Sampling stations at the proposed restoration project site are shown in Figures MW- 7. A cross section of the upland stations is shown in Figure MW-8. Samples taken at various elevations throughout the study area in test pits, trenches, banks and tideflat sediments are designed to provide a specific type of information, described below.

Sample Type	Sample Purpose
Test pit sampling	Characterize material in the horizons (8-10 ft MLLW and 10-12 ft. MLLW) bracketing the future intertidal surface in order to ascertain the suitability of the material in this horizon for conversion, via removal of overburden, to intertidal habitat. Samples taken from adjoining test pits on City property at the same elevations will be combined to create composite samples. Discrete sampling will be utilized on DNR property.
Trench sampling	Characterize soils in the 12-18 ft. MLLW horizon. Much of this overburden material will be excavated and removed during project construction; data collected by the City will be used to define soil disposal or use options. Samples taken from trenches will be composite samples obtained from representative material over the length and depth of any trench.
Bank sampling	Characterize the material evident in the bank, in strata that is obviously contaminated and in strata below the contaminated material in which contamination is not evident. Sampling of these two bank strata will be used, in conjunction with pit and trench sampling, to characterize the extent of on site contamination. Banks samples will be composite samples obtained from representative material within each strata and reach.
Core and Grab Samples (Tideflats)	Define the nature of the surrounding aquatic environment. These latter samples in essence provide context for restoration planning at the project site. These samples will be discrete samples.

The removal and re-use of material in alternative locations on site may be proposed if the material is physically and chemically suitable for the proposed use. Material will not be left on site or utilized on site if such use results in the maintenance or creation of a potential source of

contaminants to the waterway. Likewise, the ultimate removal of material from the property will be managed in a manner that prevents contamination from reaching the waterway

4.2 SAMPLING STATION LOCATION METHODS

Each location will be plotted on an appropriate blueprint drawing to determine the Washington State plane coordinates (MLLW datum). The position of each sampling location will be measured from existing city monuments or two known points previously surveyed and marked with a rebar and cap on City property. Station positioning will be achieved by measuring from the monuments or the surveyed positions to the sampling location. These coordinates will then be converted to latitude and longitude coordinates using Wildsoft Survey Software (Leica 1990), or equivalent, and reported to the nearest 0.1 second. The measurements to each location and the state plane coordinates will be provided with the final report. Locations are contained in Figure MW-7.

4.3 PRE-SAMPLING PREPARATION

A backhoe will be scheduled well in advance of the sampling date, and other necessary equipment, such as core tubes, compositing bowls, and appropriate sample containers, will be obtained. The analytical and bioassay laboratories will be advised to expect the arrival of samples.

The stainless steel spoons and bowls, or other materials anticipated to come into contact with the samples, will be cleaned and decontaminated as follows: a thorough Alconox® wash; hot water rinse; a thorough rinse with deionized water (DI); rinse with methanol to remove residual organic mater; a final thorough rinse with DI. Once cleaned in the laboratory, the equipment will be wrapped in aluminum foil to prevent contamination. Prior to sampling, the samples will be labeled with station identification number, date, and time of collection.

4.4 SAMPLE COLLECTION AND FIELD PROCESSING

4.4.1 Sample Collection and Compositing

Test Pits

The upland sampling points have a current surface elevation of approximately 18 MLLW. Therefore, 6 ft of overlaying soil will be removed using a backhoe in order to access the underlying material proposed for excavation. (These elevations and depths will be confirmed by field surveys prior to sampling). Upon reaching the +12 ft MLLW elevation, the backhoe bucket will be de-contaminated and a sample will be taken to not deeper than +10 feet MLLW. Subsequently, upon reaching +10 ft MLLW, the backhoe bucket will be de-contaminated again and a sample taken to not deeper than +8 ft MLLW.

Samples taken from test pits on City property will be combined to create four composite samples. One composite will be created from material taken from test pits 1 and 2 at the 10-12 ft MLLW horizon to create composite sample 12A. A second composite will be created from material taken from test pits 1 and 2 at the 8-10 ft MLLW horizon to create composite sample 12B. Composite samples 34A and 34B will be similarly developed from test pits 3 and 4. Samples obtained from test pits 5 and 6 at 8-10 and 10-12 ft. MLLW on DNR property will be transported to the lab as four discrete samples. These samples will represent material that may be exposed as a new intertidal surface or used to raise elevations in order to create high marsh areas. The elevation of the new intertidal surface will vary slightly, but will generally occur at about +10 ft MLLW.

Trenches

Trenches will be sampled in 100 foot lengths, with one random sample of representative material obtained from every set of ten backhoe buckets. General observations of the physical composition of the excavated material will be recorded during trench excavation (see Section 4.4.2, Field Measurements and Miscellaneous Data). Non-representative material, such as obvious strata of contamination, will generally not be sampled unless requested by on-site agency personnel or their consultants but will be noted in the geologic log.⁶

Banks

Bank composite samples will be developed by sampling a) equal volumes at up to five locations of the typical contaminant in each 150 reach of contaminated bank strata and b) equal volumes of material at 30 foot intervals within the assumed uncontaminated strata within every 150 foot reach. If more than one type of contaminant is evident in any reach, samples sufficient to describe each contaminant separately will be obtained and analyzed.

Cores

Core samples will be obtained at 0-10 cm, 1-2 foot, and 2-3 foot depths using hand-driven shelly tubes. Samples will be analyzed as discrete samples.

Grabs

Grab samples will be obtained at a depth of 0-10 cm using hand-trowels after removal of any overlying soil sloughage. Samples will be analyzed as discrete samples.

General

Sample material will generally be placed in a stainless steel bowl for homogenization prior to transfer to sample containers. Sample material to be analyzed for volatile compounds, however, will be placed directly into sample containers without homogenization. For composite test pit samples, the stainless steel bowls containing material for samples will be covered and stored on ice until samples from all appropriate locations have been collected. The sample observations described in Section 4.4.2 will then be made, the samples composited, and the bowls decontaminated. Trench and bank composite samples will be placed directly into stainless steel bowls and sample observations will be logged as sampling proceeds. Shelly tubes will be

⁶ Additional glassware will be available in the field for agency-requested samples beyond those described in this SAP.

wrapped in aluminum foil and placed on ice for transport to the lab where material will be removed and placed in sample containers. Equal volumes of material will be composited from each sampling position to generate the composite sample. The spoon will be de-contaminated between samples. One homogenized sample, determined to have an adequate volume, will be split to provide a blind duplicate. The duplicate will be labeled A99. All sampling devices touching the sample material will be previously decontaminated. Full QA/QC requirements are detailed in Appendix B.

Samples for analysis of sulfides and volatile organic compounds will be taken directly from the representative scoop of material prior to any subsampling for other analyses, immediately after sample collection and prior to compositing. Samples for sulfide analysis will be placed in 125 ml glass jars without mixing the material. Using a pipet, 40 ml of zinc acetate will be placed on top of the sample in the jar. For volatile organics, two separate 40 ml glass containers will be completely filled with sediment. No headspace will remain in these containers. Two samples will be collected to ensure that an acceptable sample without headspace is submitted to the laboratory for analysis. If there is adequate water in these sediments the containers will be filled to overflowing so that a convex meniscus forms at the top. Once sealed the bottle will be inverted to verify the seal by demonstrating the absence of air bubbles. If there is little or no water in the sediment, the jars will be filled and sealed as tightly as possible, eliminating obvious air pockets. Each sample will be stored at appropriate temperature until analyzed, and sediment samples collected for analysis of volatile compounds will not be frozen. Sample container and storage requirements are presented as a table in Appendix B, the QAPP. Each sample reserved for bioassays will be stored at 4°C in the dark, and with nitrogen gas in the container headspace, for up to 56 days pending initiation of any required biological testing.

Glassware and containers for collecting sample material will be provided by the City Lab and the contract biological lab. Containers will be pre-cleaned according to EPA CLP or PSEP protocols. A solvent rinse will not be used on the containers for analysis for volatile organics. Additional jars will be available to allow for breakage. Each sample container, as detailed in Appendix B, will be clearly labeled with the project name, sample/composite identification, date and time, initials of person(s) preparing the sample, analysis specifications, any pertinent comments such as preservatives present in the sample. Each sample will be referenced by entry onto the field log sheets.

4.4.2 Field Measurements and Miscellaneous Data

In addition to physical collection of the sediment samples, specific field information will be recorded. A field data log will be used to note the date, time, and location of sampling stations, as well as additional auxiliary parameters recorded in the field. The following data will be included on the data log:

- o General field observations including, but not limited to, weather conditions, presence of shipping or other activities in the area, and any factors which may effect the quality data.

- o Depth of each subsurface station sampled relative to existing grade. Depth will be measured by using a tape measure from a previous surveyed elevation.
- o Date and time of collection of each sample.
- o Names of field coordinators and person(s) collecting and logging in the samples.
- o Qualitative notation of apparent resistance of sediment column to digging.
- o Observations made during sample collection.
- o Observations of sampling pits during excavation including water level and strata.

Sediment description of each sample will be recorded on the data log for the following parameters as appropriate:

- o Sample recovery (for cored)
- o Depth of sediment
- o Physical soil description in accordance with the Unified Soil Classification System (includes soil type, density/consistency, color)
- o Odor
- o Debris
- o Biological activity (e.g., detritus, shells, tubes, bioturbation, live or dead organism)
- o Presence of oil sheen
- o Any other distinguishing characteristics or features, such as the presence or absence of slag.

4.5 SAMPLE TRANSPORT AND CHAIN-OF-CUSTODY PROCEDURES

Chain-of-custody (COC) forms will be completed immediately after sample processing. All sample containers will be carefully packed in containers to prevent breakage and transported in an upright position, on ice, to the City laboratory on the day of sample collection. Upon delivery of the samples to lab, representatives of lab will verify that sample descriptions on the COC are consistent with actual delivered samples. The COC will then be signed with the date and time

included in the appropriate spaces. Representatives of both companies will retain a copy of the COC. A sample chain of custody form is included in this report in the appendix.

An additional COC will be filled out for transfer of material to the bioassay laboratory from the City laboratory, if necessary. The material for bioassay testing will be held at 4°C until test initiation, if required. Maximum holding times are noted in the appendix..

5.0 PHYSICAL/CHEMICAL SEDIMENT ANALYSES

5.1 LABORATORY ANALYSES PROTOCOLS

As discussed previously, to meet QA/QC requirements, a blind duplicate sample will be analyzed for all conventional parameters, the chemical constituents for which the state has adopted sediment standards, and additional parameters as noted in Table MW-6. The composite samples will be identified as discussed in Section 4.4.1. The laboratory will be instructed to prioritize the conventional and grain size analyses, as those parameters are necessary for the selection of reference sediment(s) and appropriate bioassay testing procedures.

A COC record for the samples will be maintained throughout all sampling activities and will accompany samples during shipment to the laboratory. Custody of samples in the laboratory are controlled by keeping all samples in storage with locks that have a controlled number of keys.

Laboratory testing procedures will be conducted in accordance with the *Puget Sound Estuary Program Recommended Protocols*. Several details of these procedures are discussed below and in the project QAPP (Appendix B).

5.1.1 Conventional Parameters

The following conventional parameters must be run on each sample within the holding times specified below:

— Total volatile solids	14 days at 4°C
— Total organic carbon	14 days at 4°C
— Percent solids	14 days at 4°C
— Total sulfides	14 days at 4°C
— Ammonia	7 days at 4°C
— Grain size distribution	6 months at 4°C

Particle grain size distribution for each composite sample will be determined in accordance with EPA (1991). Wet sieve analysis will be used for the sieve sizes US No. 4, 10, 20, 40, 60, 140, 200, and 230. Pipette/hydrometer analysis will be used for particle sizes finer than the 230 mesh (as per ASTM 422). Water content will be determined using ASTM D2216. Sediment classification designation will be made in accordance with US Soil Classification System (ASTM D2487).

As mentioned above, the laboratory will be instructed to prioritize the grain size distribution, ammonia, and sulfide measurements, as those data are necessary for decisions related to biological tests (e.g., reference sediment selection, aeration of larval tests).

Table MW-6
Methods of Analysis and Detection Limit Goals

Analyte	SQO	Detection Limit Goals (8)	Test Methods Sediments	
			Reference	Method
CONVENTIONALS & MISC.				
Total Solids		1 %	SM	2540 G
Total Vol Solids		1 %	SM	2540 E
Total Organic Carbon		0.1 %	SW 846	9060 with I.R.
Ammonia		50 ppm	MCAWW	350
pH		NA	SW 846	9045
Sulfide		NA	PSEP	NA
Grain Size		NA	ASTM	D-422
METALS in mg/kg (ppm)				
Antimony	150	100	CLP	SOW ILM03.0 (11)
Arsenic	57	1	CLP	SOW ILM03.0 (1)
Chromium		1.2	CLP	SOW ILM03.0 (1)
Mercury	0.59	0.1	CLP	SOW ILM03.0
Silver	6.1	1	CLP	SOW ILM03.0 (1)
Copper	390	2.5	CLP	SOW ILM03.0 (1)
Nickel	140	4	CLP	SOW ILM03.0 (1)
Cadmium	5.1	1	CLP	SOW ILM03.0 (1)
Lead	450	0.6	CLP	SOW ILM03.0 (1)
Zinc	410	2	CLP	SOW ILM03.0 (1)
Tributyltin (as Tin) in $\mu\text{g/kg}$ (ppb)		30	Laucks SOP	3550/8270 (7)
PHENOLS & SUB PHENOLS in $\mu\text{g/kg}$ (ppb)				
Phenol	420	100	CLP	SOW OLM01.8 (2)
2-Methylphenol	63	55	CLP	SOW OLM01.8 (2)
4-Methylphenol	670	100	CLP	SOW OLM01.8 (2)
2,4-Dimethylphenol	29	29	CLP	SOW OLM01.8 (2,9)
Pentachlorophenol	360	200	CLP	SOW OLM01.8 (2)
LPAHs in $\mu\text{g/kg}$ (ppb)				
Naphthalene	2100	100	CLP	SOW OLM01.8 (2)
2-Methylnaphthalene	670	100	CLP	SOW OLM01.8 (2)
Acenaphthylene	1300	100	CLP	SOW OLM01.8 (2)
Acenaphthene	500	100	CLP	SOW OLM01.8 (2)
Fluorene	540	100	CLP	SOW OLM01.8 (2)
Phenanthrene	1500	100	CLP	SOW OLM01.8 (2)
Anthracene	960	100	CLP	SOW OLM01.8 (2)
HPAHs in $\mu\text{g/kg}$ (ppb)				
Fluoranthene	2500	100	CLP	SOW OLM01.8 (2)
Pyrene	3300	100	CLP	SOW OLM01.8 (2)
Benzo(a)anthracene	1600	100	CLP	SOW OLM01.8 (2)
Chrysene	2800	100	CLP	SOW OLM01.8 (2)
Total Benzofluoranthene (10)	3600	100	CLP	SOW OLM01.8 (2)
Benzo(a)pyrene	1600	100	CLP	SOW OLM01.8 (2)
Indeno(1,2,3-cd)pyrene	690	100	CLP	SOW OLM01.8 (2)
Dibenzo(a,h)anthracene	230	100	CLP	SOW OLM01.8 (2)
Benzo(g,h,i)perylene	720	100	CLP	SOW OLM01.8 (2)

Table MW-6
Methods of Analysis and Detection Limit Goals

Analyte	SQO	Detection Limit Goals (8)	Test Methods Sediments	
			Reference	Method
PESTICIDES/PCBs in $\mu\text{g}/\text{kg}$ (ppb)				
Total PCBs	150	80	CLP	SOW OLM01.8 (5,6)
4,4'-DDE	9	8	CLP	SOW OLM01.8 (6)
4,4'-DDD	16	8	CLP	SOW OLM01.8 (6)
4,4'-DDT	34	8	CLP	SOW OLM01.8 (6)
Chlordane (alpha, gamma)		8	CLP	SOW OLM01.8 (6)
Aldrin		8	CLP	SOW OLM01.8 (6)
Dieldrin		8	CLP	SOW OLM01.8 (6)
Heptachlor		8	CLP	SOW OLM01.8 (6)
Lindane		8	CLP	SOW OLM01.8 (6)

Notes:

- (1) CLP digestion is 1gm/200 ml. Our digestion would be 1 gm/100 ml.
- (2) Target analytes detected below the established linear range of the instrument but meeting the mass spectral identification criteria will be J-flagged as estimate values.
- (3) Determined in the ABNs analysis.
- (4) Determined in the pesticide fraction.
- (5) Total values are calculated by summing concentrations above detection limits. Concentrations not detected at the detection limit value will not be included.
- (6) Modified as necessary for the limited target analyte list and including any or all of the following cleanups: florasil cleanup; SW 846 Method 3620; sulfite sulfur cleanup; or elemental mercury cleanup for sulfur.
- (7) Based on Krone et al., 1989 (NOAA) A method for analysis of Butyltin species and measurement of butyltins in sediment and English Sole Livers from Puget Sound. Modified to achieve required DLG (SOP).
- (8) Based on dry weight with assumption of sediment moisture content <50%.
- (9) Detection limit goal is below analyte's method detection limit. Samples with no semivolatile target analytes detected above the SQO value(s) will be reanalyzed, subsequent to further concentration of the sample extract, as a means to achieve detection limit goals. Please note that detection limits are highly matrix dependent, and may not always be achievable.
- (10) Sum of benzo(b)fluoranthene and benzo(k)fluoranthene.
- (11) Antimony will be analyzed along with other metals; however, QC criteria will not be enforced to reanalyze the sample.

SM Standard Methods, 18th Edition
 DLG Detection Limit Goals
 CLP Contract Laboratory Program
 MCAWW Methods for the Chemical
 Analysis of Water and Waste
 PSEP Puget Sound Estuary Program

Actual Sample Detection Limits may vary from Method Detection Limits depending on the influences of limited sample volume, matrix interferences, blank contamination, and moisture content of sediments.

Table MW-6
Methods of Analysis and Detection Limit Goals

Analyte	SQO	Detection Limit Goals (8)	Test Methods Sediments		
			Reference	Method	
<u>CHLOR. AROMATICS in $\mu\text{g}/\text{kg}$ (ppb)</u>					
1,3-Dichlorobenzene	170	100	CLP	SOW OLM01.8	(2,3)
1,4-Dichlorobenzene	110	100	CLP	SOW OLM01.8	(2,3)
1,2-Dichlorobenzene	50	45	CLP	SOW OLM01.8	(2,3)
1,2,4-Trichlorobenzene	51	30	CLP	SOW OLM01.8	(2,3)
Hexachlorobenzene	22	8	CLP	SOW OLM01.8	(4,6)
<u>CHLOR. ALIPHATICS in $\mu\text{g}/\text{kg}$ (ppb)</u>					
Hexachlorobutadiene	11	8	CLP	SOW OLM01.8	(4,6)
<u>PHTHALATE ESTERS in $\mu\text{g}/\text{kg}$ (ppb)</u>					
Dimethyl phthalate	160	100	CLP	SOW OLM01.8	(2)
Diethyl phthalate	200	100	CLP	SOW OLM01.8	(2)
Di-n-butyl phthalate	1400	100	CLP	SOW OLM01.8	(2)
Butylbenzylphthalate	900	100	CLP	SOW OLM01.8	(2)
Bis(2-ethylhexyl)phthalate	1300	100	CLP	SOW OLM01.8	(2)
Di-n-octyl phthalate	6200	100	CLP	SOW OLM01.8	(2)
<u>MISC. OXY. COMPOUNDS in $\mu\text{g}/\text{kg}$ (ppb)</u>					
Benzyl alcohol	73	50	CLP	SOW OLM01.8	(2)
Benzoic acid	650	500	CLP	SOW OLM01.8	(2)
Dibenzofuran	540	100	CLP	SOW OLM01.8	(2)
N-nitrosodiphenylamine	28	28	CLP	SOW OLM01.8	(2,9)
<u>VOLATILE ORGANICS in $\mu\text{g}/\text{kg}$ (ppb)</u>					
Tetrachloroethene	57	20	CLP	SOW OLM01.8	(2)
Trichloroethene		20	CLP	SOW OLM01.8	(2)
Ethylbenzene	10	10	CLP	SOW OLM01.8	(2)
Total xylenes	40	20	CLP	SOW OLM01.8	(2)

5.1.2 Chemical Analysis

Sediments, subsurface soils and bank material will be analyzed for the chemicals listed in Table MW-6. This table also lists the preparation and analysis method, sediment method detection limit, and sediment standards (EPA and State Department of Ecology). Every effort will be made to achieve detection limits below the Sediment Quality Standards (SQS), and the testing laboratory will be specifically notified of importance of the SQS detection limit requirements.

5.1.3 Quality Assurance/Quality Control Requirements

Complete QA/QC requirements are presented in the Quality Assurance Project Plan (Appendix B).

5.2 LABORATORY WRITTEN REPORT

A written report will be prepared by the analytical laboratories documenting all the activities associated with the sample analyses. At a minimum, the following will be included in the report:

- o Results of the laboratory analyses and QA/QC results
- o All protocols used during analyses and explanation of any deviations from the sampling plan protocols
- o Chain-of-custody procedures, including explanation of any deviation from those identified in this plan
- o Location and availability of data.

As appropriate, this sampling plan may be referenced in describing protocols. Further reporting that will be completed by the City is detailed in Section 6.0.

5.3 GEOLOGIC MAPPING

Test pits, trenches and bank areas will be field-logged during sample collection and a stratigraphic map prepared in order to guide eventual project construction. Field logging will be conducted by qualified staff from Parametrix.

6.0 BIOLOGICAL TESTING

The City plans will conduct biological analysis on three samples collected in the tidelflat area in conjunction with chemical analysis of those samples. In upland areas, a tiered approach will be utilized. Coordination between agency and local government staffs will be maintained throughout the analytical and biological testing process, described below.

6.1 BIOASSAY LABORATORY PROTOCOLS

Samples will be collected at three tidelflat stations for biological analysis; in upland areas, a tiered testing approach will be used. Biological testing, and associated chemical re-testing, will be undertaken on any upland sample which has one or more chemicals above Minimum Cleanup Levels (MCULs). For samples in which one or more parameters exceed Sediment Quality Standards but not MCULs, the need for bioassay testing will be evaluated on an individual basis in consultation with the agencies. Testing will include the standard Ecology sediment suite of bioassays. To the maximum extent practicable, chemical results will be provided for bioassay decisions within 28 days of the first sample collection. The remaining 28-day period will allow for bioassay preparation as well as re-tests, if necessary.

Bioassay testing requires that test sediments be matched and run with an appropriate reference sediment to factor out sediment grain-size effects on bioassay organisms. The approach to selecting reference sediment samples is outlined below:

Highest priority for testing will be the conventional parameters, specifically, the sieve-analysis portion of grain size determination. These early results are used to support the selection of the reference sediment(s).

The laboratory performing the biological analysis will collect the identified reference sediments as soon as the location is selected. The guidance received by the regulating agencies will assist the City in locating a suitably matched reference sediment. Wet-sieving in the field, however, is essential in finding an adequate match. The location of the reference sediment sampling station will be recorded to the nearest 0.1 second.

All sediment samples for potential bioassays will be stored at 4°C, with headspace purged with nitrogen, pending initiation of bioassay testing. All bioassay analyses, including re-tests, will commence within 56 days after collection of the first core section in the sediment composite to be analyzed. Chain-of-custody procedures will be maintained by the laboratory throughout biological testing.

Bioassay testing will be pre-planned to initiate appropriate testing as soon as possible after the analytical results have been received. This includes obtaining test organisms and control and reference sediments in a timely manner. This approach will support the opportunity for any re-testing to occur within the 56-day holding period, if necessary. As initial chemistry data becomes

available, the project manager and the bioassay laboratory representative will coordinate closely with Ecology to expedite biological testing decisions.

The acute toxicity bioassays prescribed by Ecology (amphipod, echinoderm embryo, saline extract Microtox) and juvenile *Neanthes* will be conducted on each sample identified for biological testing. All biological testing will be in compliance with Recommended Protocols for Conducting Laboratory Bioassays on Puget Sound Sediments (USEPA, Region 10), with appropriate modifications as specified by the agencies. General biological testing procedures and specific procedures for each sediment bioassay are summarized below.

6.2 GENERAL BIOLOGICAL TESTING PROCEDURES

6.2.1 Negative Controls

Negative control sediments are used in the amphipod and *Neanthes* bioassays to check laboratory performance. Negative control sediments are clean sediments in which the test organism normally lives, and exposure to which is likely to incur low mortality.

The sediment larval test will utilize a negative seawater control rather than a control sediment.

The Microtox test has a blank incorporated in the test as a negative control and does not use a negative sediment or seawater control.

The amphipod, sediment larval, and *Neanthes* tests all have performance standards for negative controls, which are identified in Section 6.3.

6.2.2 Reference Sediment

For test comparison, bioassay reference sediments are used which closely match the grain size characteristics of the test sediments. The reference sediment data are used to statistically block physical effects of the test sediment. The City, upon the advise of Corps of Engineer dredge disposal staff, expect to utilize a station in Carr Inlet for reference sediment collection.

All reference sediments will be analyzed for conventional parameters, which include: total solids, total volatile solids, total organic carbon, ammonia, total sulfides, and grain size.

All bioassays have performance standards for reference sediments (see Section 6.3). The decision to re-test will be made in consultation with the agencies.

6.2.3 Replication

Five laboratory replicates of test sediments, reference sediments, and negative controls will be run for each bioassay. The Microtox test includes a dilution series with five replicates at the highest concentration as per the PSEP guidelines.

6.2.4 Positive Controls

A positive control will be run for each bioassay. Positive controls are chemicals known to be toxic to the test organism. These provide an indication of the sensitivity of the particular organisms used in a bioassay. Cadmium chloride will be used for the amphipod, *Neanthes*, and sediment larval bioassays. Phenol will be used for the Microtox test.

6.2.5 Monitoring of Sediment and Water Quality Parameters

Water quality monitoring will be conducted daily for the amphipod and sediment larval tests, and every other day for the *Neanthes* biomass bioassay. Parameters measured will be salinity, temperature, pH, and dissolved oxygen. Monitoring will be conducted for all test sediments, reference sediments, and negative controls (including seawater controls). Parameter measurements must be within the limits specified for each bioassay. One replicate test vessel representing each station will be monitored for water quality parameters. Ammonia and sulfides will be determined at test initiation and termination. Initial ammonia and sulfide measurements for each treatment will be taken from a separate chemistry beaker set up to be identical to the other replicates within the treatment group, but without test organisms. Final aqueous ammonia and sulfide measurements will be taken at the end of the test from the beakers used for monitoring the other water quality parameters. If any of these parameters are outside the levels recommended in the protocol, the Department of Ecology will be contacted.

Prior to initiation and immediately following termination of the bioassays the redox potential of test sediments from each station will be measured, and the values recorded.

6.3 BIOASSAY-SPECIFIC PROCEDURES

6.3.1 Amphipod Bioassay

This test involves exposing the amphipod *Rhepoxynius abronius* to test sediment for ten (10) days and counting the number of surviving amphipods at the end of the exposure period. Daily emergence data and the number of amphipods failing to re-bury at the end of the test will also be recorded. Test validity will be ensured by performance standards.

The Sediment Quality Standard (passing) is defined by a maximum of 25% percent mortality and mortality levels statistically different (higher) than reference sediments. The reference sediments have a performance standard of 25 percent mortality and the control sediments have a performance standard of 10 percent mortality.

Sediment and water quality parameters will be measured as outlined in Section 6.2.5. The agencies will be consulted immediately if any abnormal observations are made.

6.3.2 Sediment Larval Bioassay

This test monitors larval development of a suitable echinoderm species (*either Strongylocentrotus purpuratus or Dendraster excentricus*) in the presence of test sediment. The test is run until the appropriate stage of development is achieved in a sacrificial seawater control. At the end of the test, larvae from each test sediment exposure are examined to quantify abnormality and survival.

The sediment larval bioassay has a variable endpoint (48-96 hours) which is determined by the developmental stage of organisms in a sacrificial seawater control. Initial counts will be made for a minimum of five 10-ml aliquots. Final counts for seawater control, and reference and test sediments will be made on two 10-ml aliquots from each replicate.

The state standard (passing) is defined by statistical significance from reference sediments and less than 15% of the mean mortality/abnormality observed in reference sediments. The seawater control has a performance standard of 50 percent combined mortality and abnormality.

Sediment and water quality parameters will be monitored as outlined in Section 6.2.5. In the event any abnormal observations are made, the agencies will be contacted immediately.

6.3.3 Microtox Bioassay

The Microtox bioassay will test the bioluminescence of the bacterium *Photobacterium phosphoreum* following a 15-minute exposure to a saline extract of test sediment. All five replicates at the highest dilution will be run simultaneously with the dilution series.

The state standard (passing) is defined by significant difference from reference and mean luminescence greater than 80% of reference.

6.3.4 Juvenile Infaunal Species Bioassay

Juvenile polychaetes (*Neanthes arenaceiodentata*) are used to assess the effect of the test sediment on growth. This bioassay determines the relative change in polychaete biomass following 20 days of exposure to test, reference, and control sediments. There are five organisms per test vessel, with the exception of the positive control, which has 10 organisms per test vessel.

The state standard (passing) is defined by significant difference from reference and mean rate of biomass growth greater than 70% of reference. The control sediment has a performance standard of 10 percent mortality. The reference sediment has a performance standard of 80 percent of the mean biomass growth rate of that observed in the control.

Sediment and water quality parameters will be monitored as outlined in Section 6.2.5. In the event any abnormal observations occur, the agencies will be contacted immediately.

6.4 Interpretation

Test interpretations consist of endpoint comparisons to control and reference sediments on an absolute or relative percentage basis, as well as statistical comparison to the reference sediment. Bioassay results will be interpreted based upon criteria outlined below.

Test	Criteria	Reference Area/Control Performance Standards
Amphipod	Test mean mortality < 25% and significantly different from reference (P<0.05)	Control Sediment < 10% mortality; Reference sediment , 25% mortality
Echinoderm Embryo	Test mean abnormality and mortality >15% of mean reference response and significantly different from reference (P<0.05)	Seawater control < 50% combined abnormality and mortality
Neanthes Growth	Mean biomass < 70 % of mean reference biomass and significantly different from reference.	Control sediment < 10% mortality; Reference sediment biomass > 80% control biomass.
Benthic Major Taxa	Mean abundance of any one group < 50% of reference and significantly different from reference (P< 0.05)	Assemblage representative of unimpacted areas of Puget Sound; richness and abundance within normal range of natural variability; pollution-sensitive taxa present; pollution tolerant taxa not numerically dominant.
Benthic Richness & Abundance	Mean index less than and significantly different from reference (P < 0.05)	Assemblage representative of unimpacted areas of Puget Sound; richness and abundance within normal range of natural variability; pollution-sensitive taxa present; pollution tolerant taxa not numerically dominant.

6.5 Bioassay Re-test

Any bioassay re-test will be fully coordinated with, and approved by, the regulating agencies.

6.6 LABORATORY WRITTEN REPORT

A written report will be prepared by the laboratory, documenting all the activities associated with sample analyses. At a minimum, the following will be included in the report:

- o Results of the laboratory bioassay analyses, including control charts for each bioassay and EC_{50} calculations, and QA/QC results, reported both in hard copy and in the Corps' DAIS data format, if requested. Raw data will be legible or typed. Illegible data may result in the need for a re-test if the agencies cannot interpret the data.
- o All protocols used during analyses, including explanation of any deviation from the EPA CLP or PSEP Protocols and the approved sampling plan.
- o Chain-of-custody procedures and copies of completed forms, including explanation of any deviation from the identified protocols.

As appropriate, this sampling plan may be referenced in describing protocols.

7.0 REPORTING

7.1 QA REPORT

The project QA representatives will prepare a QA report based on field sampling techniques and review of the laboratory analytical data. The laboratory QA/QC reports will be incorporated by reference. This report will identify any field and laboratory activities that deviated from the approved sampling plan and the referenced protocols. It will make a statement regarding the overall validity of the data collected. The QA/QC report will be incorporated into the final report.

7.2 FINAL REPORT

A written report shall be prepared and submitted by the City, documenting all activities associated with collection, compositing, and transportation of samples as well as chemical and biological analysis of samples. The chemical and biological reports will be included as appendices. At a minimum, the following will be included in the final report:

- o Type of sampling equipment used.
- o Protocols used during sampling and testing, and an explanation of any deviations from the sampling plan protocols.
- o Descriptions of each sample adequate to provide a visual representation of the sediment
- o Methods used to locate the sampling positions.
- o Locations where the sediment samples were collected. Locations will be reported in latitude and longitude, to the nearest tenth of a second.
- o Chain-of-custody procedures used, and explanation of any deviations from the sampling plan procedures.
- o Description of sampling and compositing procedures.
- o Final QA report as described in Section 7.1, above.
- o QA data required by Ecology for data validation prior to entering data into their Sediment Quality database. These data are listed in Appendix B.
- o All raw data required for DAIS as identified in Appendix B.
- o Sampling and analysis cost data will be submitted upon project completion on forms provided by the agencies.

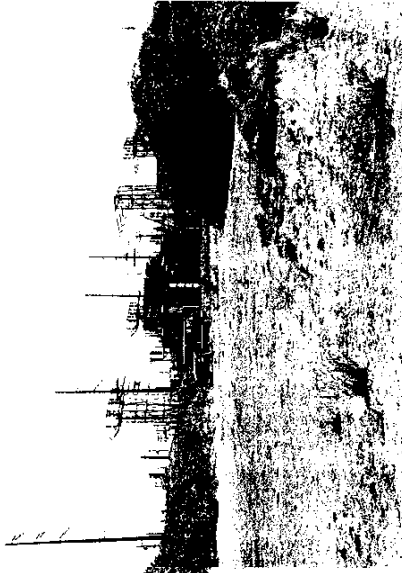
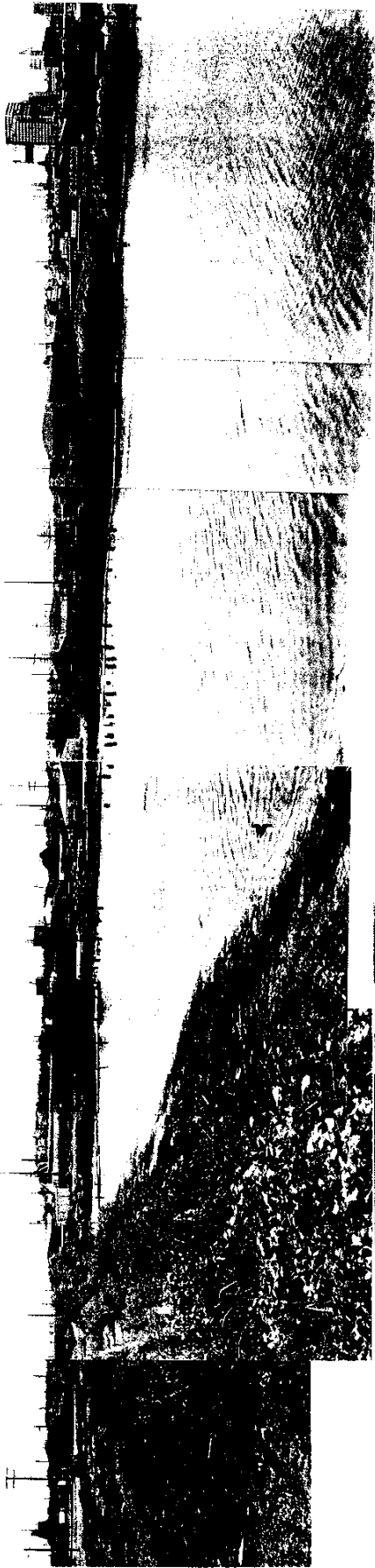
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APPENDIX A

PHOTO LOG



EDGE B.F. MILLW

12:30 PM

8/30/95

PHOTO 5 (TOP)

12:30 PM

8/30/95

PHOTO 6 (BOTTOM)

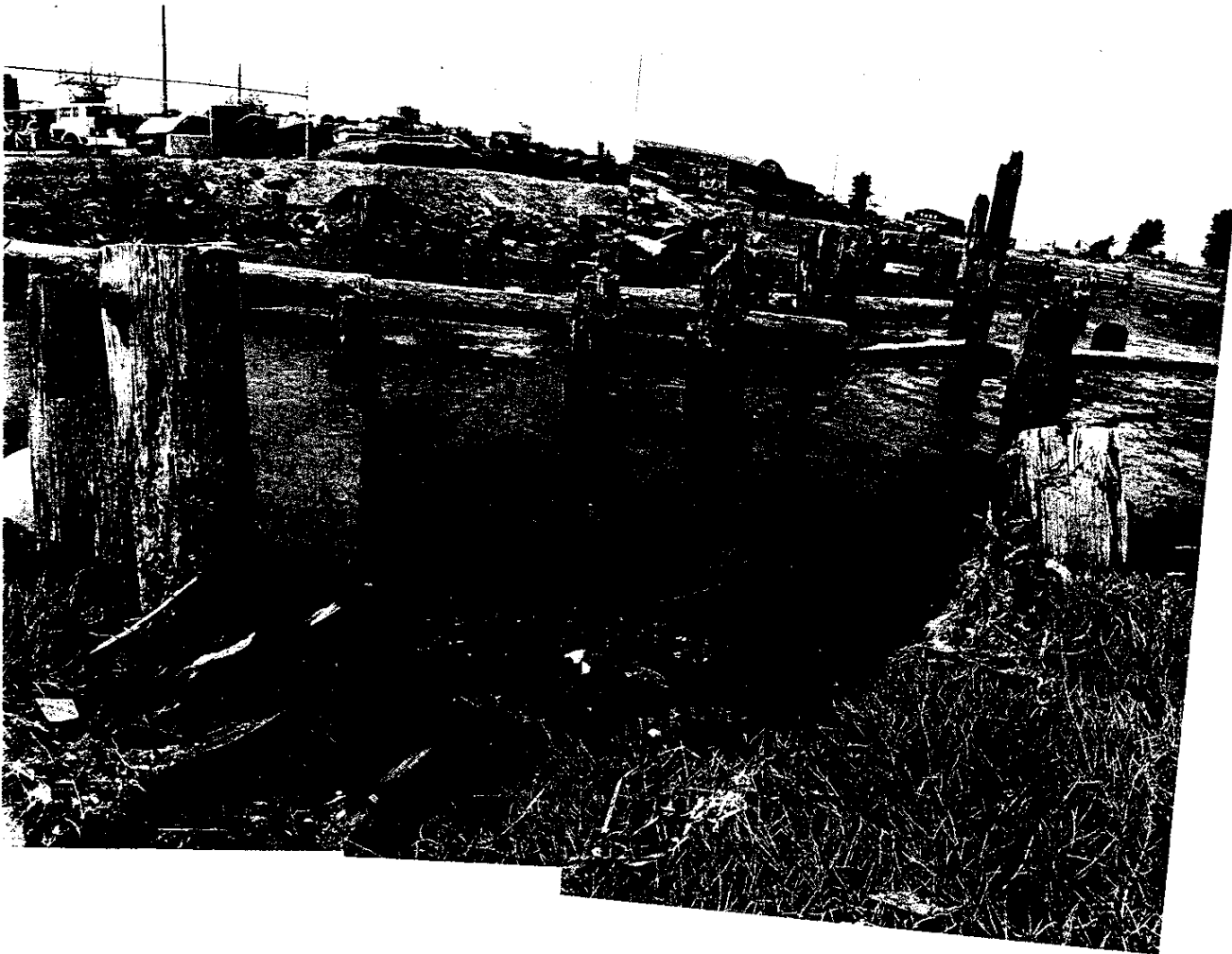


PHOTO 3 (TOP) 5/25/1995 11:30 AM
TIDE: -3.6' MLLW

PHOTOS: GSZ

PHOTO 4 (BOTTOM) 5/25/1995 11:30 AM TIDE -3.6' MLLW



PHOTO 1 (TOP) 5/25/95 11:30 AM TIDE -3.6' MLLW

PHOTO 2 (BOTTOM) 5/25/95 11:30 AM TIDE -3.6' MLLW

APPENDIX B

POTENTIAL ISSUES OF CONCERN

POTENTIAL ISSUES OF CONCERN

Sampling:

- o Deviations from the sampling and analysis plan
- o Very poor recovery (<50%)
- o Survey errors
- o Equipment changes
- o Positioning problems
- o Sampling station access problems
- o Lost coolers/samples
- o Inability to locate reference sediment with a proper grain size match based on wet-sieving results (reference sediment must not be significantly finer than test sediments).

Chemical Testing:

- o Deviations from the Sampling and Analysis Plan
- o Poor QA/QC results
- o Detection limit problems.

Biological Testing:

- o Deviations from the Sampling and Analysis Plan
- o High ammonia or sulfides (prior to bioassay)
- o Reference sediment performance failure
- o Control sediment or seawater control performance failure
- o Significant water quality deviations
- o Significant deviations of LC50/EC50 from expected range
- o Obvious adverse conditions or unusual organism mortality
- o Predation
- o Indigenous population of test species in test, reference or control sediments
- o Any retests.

APPENDIX C

QUALITY ASSURANCE PROJECT PLAN

City of Tacoma
Estuarine Natural Resources Restoration Project

1.0 LABORATORY METHODS, QUALITY ASSURANCE, AND QUALITY CONTROL FOR SEDIMENT QUALITY ANALYSIS - CHEMISTRY

1.1 Introduction

The purpose of the Quality Assurance Project Plan (QAPP) presented herein is to give, in specific terms, the objectives, organization, and functional activities, associated with the sampling and analysis activities as set forth in the Sampling and Analysis Plan for the Middle Waterway Estuarine Natural Resources Restoration Project. This QAPP covers the sampling and analysis of upland (trenches and test pits), bank, intertidal surficial (0 to 10 cm) and intertidal core sediment samples for this project.

This document is based upon the QAPP prepared for recent Foss Waterway sediment predesign sampling and analysis. A number of EPA documents were used as aids in preparing the Foss document, including a specific set of EPA guidelines. This document, by extension, is designed to be consistent with and to meet the intent of EPA requirements.

Field activities, including sample collection and station surveys, will be conducted by City personnel with the aid of professional staff of Parametrix, Inc. for field logging of upland material. Chemical analyses of samples will be for TOC, tributyltin, semivolatiles, pesticides, PCB compounds, and other parameters as listed in Table 1-2. Table 1-6 summarizes samples by type (e.g. upland test pit, field duplicate). Laboratory analysis will be conducted by the City of Tacoma Laboratory, except for tributyltin, TOC and grain size; an outside laboratory will be utilized for these analyses.

The City Lab is in the process of Washington state accreditation for sediment analysis; however, EPA has indicated that in general the use of the City Laboratory is acceptable for sediment quality analysis in Commencement Bay, based upon results of Foss Waterway sampling and analysis results. The City Laboratory Quality Assurance Manuals and standard operating procedures (SOP) have previously been submitted to EPA.

1.2 Project Organization and Responsibility

Quality assurance responsibilities of project personnel are summarized in Table 1-1.

1.3 Quality Assurance Objectives for Measurement of Data in Terms of Precision, Accuracy, Representativeness, Completeness, and Comparability

The primary quality assurance objective of this project is to ensure the collection of data of known and acceptable quality that are useful for achieving the goals of the City of Tacoma Middle Waterway Estuarine Natural Resources Habitat Restoration Project.

The quality of the laboratory data is assessed by precision, accuracy, representativeness, comparability, and completeness (the "PARCC" parameters). Definitions of these parameters and the applicable quality control procedures are given below.

Chemical Analyses

The applicable quality control procedures and quantitation limits are dictated by the specific analytical methods employed and the intended use of the data. For this project, the chemical data will be used to assess the nature and extent of contamination within the study area. Chemical analysis for the parameters in Table 1-2 will be performed on the sediment samples. This table presents a compilation of analytes of concern with their associated method of analysis, detection limit goals, and the SQOs for sediment samples. Tables 1-3 and 1-4 present the Project precision and accuracy objectives, which reflect necessary method modifications for achieving required detection limits. Table 1-5 presents the SRM/CRM results acceptance criteria. Table 1-6 is a field and QC sample summary.

Quality Assurance Objectives

Precision. Precision measures the reproducibility of measurements under a given set of conditions. Specifically, it is a quantitative measure of the variability of a group of measurements compared to their average values. Precision is generally evaluated using both MS/MSD results and field duplicate results. MS/MSD results provide information on laboratory (only) precision, while field duplicates provide information on field and lab precision combined.

Analytical precision is measured through matrix spike/matrix spike duplicate (MS/MSD) samples for organics analyses, MS/duplicate for metals, and through duplicate samples for other inorganic analyses. Analytical precision is quantitatively expressed as the relative percent difference (RPD) between the MS/MSD or duplicates. Analytical precision measurements will be carried out on intertidal sediment samples at a minimum frequency of one per batch of sediments (20 or fewer field samples per intertidal batch, which consists of one or more sample delivery groups) or one in 20 samples per matrix analyzed, whichever is more frequent. A quantitative definition of the RPD is given in Section 1.12. The quality assurance objectives are presented in Table 1-3.

Two field duplicates (homogenized samples, except VOA and sulfides) will be collected and analyzed for this project. Considering high variability of sediment matrix and uncertainties associated with the field sampling, and based on the data from previous similar sediment project, the precision acceptance criteria for field duplicates will be equal to or less than 50% RPD. The field replicate results will be evaluated to establish field variability of the sediments.

Accuracy. Accuracy measures the closeness of the measured value to the true value. The accuracy of chemical test results is assessed by analyzing standard reference materials or by "spiking" samples with known standards (surrogates and/or matrix spike) and measuring the percent recovery. A quantitative definition of percent recovery is given in Section 1.12.

Accuracy measurements for sediment samples will be carried out in accordance with CLP SOW requirements for organic and inorganic analyses and at a minimum frequency of one per batch or one in 20 samples per matrix analyzed, whichever is greater.

As additional laboratory internal QC check samples for this project, the laboratory will also analyze the applicable sediment standard reference materials (SRMs) or certified reference materials (CRMs) using the project specific methodologies (Table 1-2) (which may not be the same as the SRM/CRM employed) for limited selected samples. The availability of SRMs and CRMs are subject to change and specific catalog numbers may vary; hence, the associated certified values and acceptance ranges may change accordingly. The SRM/CRM accuracy requirements are presented in Table 1-5. The generated data will be evaluated based on the certified values and associated uncertainties provided in the "Certificate of Analysis" of the SRMs/CRMs, and the accuracy acceptance criteria are presented in Table 1-5. The SRM/CRM data are intended for use in evaluating the consistency of the analytical methods. Therefore, no data will be rejected or samples reanalyzed based on SRM results alone.

In the event that low recoveries of SRM ABN and pesticides/PCBs analytes are encountered, blank spikes may be concurrently analyzed with the SRM. Acceptable blank spike recoveries would indicate the analytical process was in control and support the validity of the data.

Representativeness. Representativeness measures how closely the measured results reflect the actual concentration or distribution of the chemical compounds in the matrix sampled. The sampling plan design, sampling techniques, and sample handling protocols (e.g., storage, preservation, and transportation) have been developed to assure representative samples; these procedures are discussed in the Sampling and Analysis Plan (SAP). Field duplicates will be collected from the homogenized sample (except VOA and sulfide samples) to evaluate the precision (reproducibility) of the field procedures (sample collection, processing) and to assess laboratory method variation. The field duplicates for VOA and sulfide analyses will be collected first from the same grabs without mixing. For the composite samples, equal aliquots of subsamples will be layered in the sample containers. Sulfide composite samples will be mixed with ZnOAc preservative in the closed sample containers in the field. Laboratory method blanks will be run at a minimum of 5 percent frequency or one per batch, whichever is more frequent, to assess laboratory contamination.

Completeness. Completeness is defined as the percentage of measurements made which are judged to be valid measurements. The completeness of the data will be the number of acceptable data points over the total number of data points times 100. A target completeness goal for this work will be 90 percent. A quantitative definition of completeness is given in Section 1.12.

Comparability. Comparability is a qualitative parameter expressing the confidence with which one data set can be compared with another. The use of standard techniques for both sample collection and laboratory analysis should make data collected from same sampling locations and depth comparable to both internal and other data generated.

1.4 Sediment Sampling Procedures

Sample site location and description and sampling procedures are detailed in the SAP. The plan outlines the data needs identified for this work and the specific procedures to be used to obtain representative samples to fulfill these data needs. The information provided within the QAPP outlines the data documentation procedures which will be followed to assure quality data. The documentation procedures include specific data forms for recording field observations and Sample Custody Records.

To control the quality of samples submitted for laboratory analysis, established preservation and storage measures will be followed. Table 1-7 provides information on holding times, sample containers, and sample preservation requirements for sediment samples. All sediment sample containers will be provided by the City or contract lab. The labs will either clean the sample containers and conduct the certification analyses or purchase precleaned and certified free of contamination sample containers from environmental sampling supply companies. The analytical results and the certifications will be kept in the laboratory project files.

The containers are precleaned by the laboratory or supplier(s) to one of three specifications, depending on the analytical purpose, as described below:

- **Procedure 1.** For extractable organics (acid/base/neutral compounds). The 16 ounce clear glass jars, teflon liners, and caps are washed in hot tap water using laboratory grade non-phosphate detergent. All are then rinsed three times with hot tap water. All are then rinsed once with 1:1 nitric acid (metals-grade HNO₃ and ASTM deionized water) and then rinsed three times with ASTM Type I deionized water. A final rinse is made using pesticide grade methylene chloride. The jars and teflon liners are oven-dried at 125°C, then allowed to cool to room temperature in an enclosed, contaminant-free environment before assembling.
- **Procedure 2.** For metals and miscellaneous inorganic constituents. The 16 ounce jars and caps are washed in hot tap water using laboratory grade non-phosphate detergent, then rinsed three times with hot tap water followed by one rinse with 1:1 nitric acid (metals-grade HNO₃ and ASTM deionized water). All are then rinsed three times with ASTM Type I deionized water, inverted and air-dried in a contaminant-free environment before assembling.
- **Procedure 3.** For volatile organics. The 2 ounce glass jars, screw caps, and teflon liner inserts are washed in hot tap water using laboratory grade non-phosphate detergent. The jars are then rinsed and dried in a dryer. The caps are rinsed and air dried in a wire basket. After the jars are dried they are heated in the VOA oven overnight at 100°C and then allowed to cool to room temperature. The jars are then capped for storage and labeled with a lot number that reflects the date of preparation.

1.5 Sample Custody

This section provides guidance on labeling and custody of samples.

Sample Labeling and Nomenclature

Sample labels will clearly indicate the sample number. Depth interval, date, sampler's initials, and any pertinent comments will also be included. The sample numbers will be cross-referenced with the sample locations in the field log book. Blind field duplicates, SRM samples, and rinseate blanks will be labeled with a fictitious sample number. Labels will be partially pre-filled out and put on the sample containers in the City lab. Specific sampling information (such as sampling time and person, etc.) will be filled out at the time of sampling.

Sample Custody

Definition of Custody. After recovery, samples will be maintained in the City's custody. For purposes of this work, custody will be defined as follows:

- In plain view of the field representatives;
- Inside a cooler which is in plain view of the field representative; or
- Inside any locked space such as a cooler, locker, car, or truck to which the field representative has the only immediately available key(s).

Custody Records. A chain of custody record will be initiated at the time of sampling for each sample collected. This record will be signed by the sampler and others who subsequently hold custody of the sample.

Sediment samples will be stored in coolers and transported to the laboratories for physical and chemical testing.

Custody Seal. Samples selected for chemical analyses along with their respective custody records will be transported to the chemical laboratory in coolers with custody seals affixed.

Laboratory Custody Procedures

Laboratory custody procedures ensure that each sample is uniquely identified and stored in a secure area. Access to the laboratory as a whole is restricted. Access to samples is restricted to authorized laboratory staff.

Specific lab custody procedures for this work are provided in the lab QA Manual.

Sample Receipt. Samples will be received at the laboratory under chain of custody, the chain of custody document having been initiated in the field. The Sample Custodian will observe and record the condition of custody seals present on ice chests. Before signing the chain of custody document, the samples will be inventoried to ensure that all containers are present.

Sample Log In. At log in, the samples will again be inventoried to ensure that identification on the sample containers and on the chain of custody are in agreement. Any discrepancies will be noted on the chain of custody record and will be communicated immediately to City field personnel.

Secure Sample Storage. Following log in, samples are removed to secure cold storage areas appropriate to the sample type. Volatile organics aliquots are stored at 4°C, under lock and key, in a refrigerator reserved for the purpose. They are stored separately from other sample types and from standards.

Recordkeeping. All documents created and received associated with the samples are retained in the case master file. All bench sheets, raw data, internal chain of custody documents, and other paperwork generated during storage, handling, and analysis of the samples come together at the completion of analysis, prior to reporting, and remain together filed underneath the laboratory work order number.

1.6 Calibration Procedures and Frequency

Laboratory Calibration Procedures

The laboratory calibration procedures are specified in the laboratory SOPs and EPA CLP SOWs for each parameter or the methods for non-CLP analyses. Lower concentration standards and extended calibration curves will be used for organic analysis to achieve linear range at the detection limit or below the SQOs, whenever possible.

- A 0.5 ppb standard will be incorporated into the VOA 5-point calibration curve to ensure accurate quantitation of hits at the detection limit.
- Benzyl alcohol and benzoic acid standards will be added to the semivolatile calibration.
- The laboratory will attempt to extend the linear range of the semivolatile method by running low level calibration standards at 5 ng/μl, 2 ng/μl, and 1 ng/μl in addition to the standard CLP 5-point concentration range (8-point calibration). The intent will be quantify analytes at DLG levels.
- Hexachlorobutadiene and hexachlorobenzene standards will be added to the pesticides/PCBs calibration, and these two compounds will be determined in pesticides/PCB analysis instead of in semivolatile analysis.

1.7 Sediment Analytical Procedures

Table 1-2 presents the target list of compounds to be analyzed.

In general, all organic and metal analyses for sediments will be performed in accordance to protocols specified on the Statement of Work (SOW) (ILM03.0 and OLM01.8) for the EPA CLP. Some analyses will be performed with SW 846 methods (Table 1-2). In some cases, detection limits lower than those in the SOW CLP protocols are required for particular analytes to provide sufficient data resolution for purposes of comparison with sediment cleanup objectives. In such cases modifications to established analytical methods will be necessary to achieve project data quality objectives. For instance, the sample size and final volume of the digestate or extract may have to be adjusted to achieve the required quantitation limits as described in more detail below.

Modifications to protocols for the analysis of organic substances specified in the CLP SOW OLM01.8 include the following:

Semivolatile Organics

- GC/MS semivolatile organic compound identifications will be made and concentrations will be reported as long as spectral confirmation can be made. However, the lab will report any concentrations detected below the established linear range of the instrument with "J" (estimated) qualifiers when mass spectra confirm the presence of compounds. "J" flags may also be assigned during data validation.

Pesticides (and Hexachlorobenzene and Hexachlorobutadiene)/PCBs

- To achieve the required quantitation limits, hexachlorobenzene and hexachlorobutadiene will be determined in the pesticide fraction analyses instead in the semivolatile analysis. The only method modification is to add these two compounds to the standard solution of the pesticides/PCBs method.
- In the event it is the analyst's judgement that the potential exists for petroleum hydrocarbon contamination in a sample, causing false PCB identification, a sulfuric acid cleanup and re-analysis will be performed to confirm the presence or absence of the aroclor (PCB).
- Concentrations outside the instrument linear calibration range will be qualified "J" (estimated).

VOAs

- GC/MS volatile organic compound identifications will be made and concentrations will be reported as long as spectral confirmation can be made. However, the lab will report any concentrations detected below the established linear range of the instrument with "J" (estimated) qualifiers when mass spectra confirm the presence of compounds. "J" flags may also be assigned during data validation.

Metals

Sediment samples for the analysis of metals may be digested by microwave or hot plate procedures as specified in the CLP SOW ILM03.0. Modifications to protocols for the analysis of metals specified in the CLP SOW ILM03.0 are:

- Hot plate sediment digest will be diluted to a final volume of 100 ml instead of 200 ml.
- Samples for lead analysis will be analyzed by graphite furnace or ICP.

Butyltin

- GC/MS organotin compound identifications will be made and concentrations will be reported as long as spectral confirmation can be made. However, the lab will report any concentrations detected below the established linear range of the instrument with "J" (estimated) qualifiers when mass spectra confirm the presence of compounds. "J" flags may also be assigned during data validation.
- To achieve the project required quantitation limits and meet the data quality objectives for tributyltin, the contract lab will extract two separate 20 gram aliquots of sediment via sonic horn technique and combine them prior to instrumental analysis, because lab R&D showed that analyzing sample size any larger yielded unacceptable recoveries. The tributyltin will be reported as tin.
- Three other organotin compounds (mono, di, and tetrabutyltin) will also be included in the calibration. The monobutyltin, dibutyltin, and tetrabutyltin results will be treated as TICs in the data validation.

Conventional analysis will be performed according to the lab SOPs and one of the following references: Methods for the Chemical Analyses of Water and Waste; Standard Methods, 18th edition, Puget Sound Estuary Program, or SW 846, as presented in Table 1-2, since no CLP protocols have been established for these parameters.

Other method modifications and/or alternatives may be necessary due to the saline matrix of sediment samples. In that case, EPA will be informed and the QAPP will be amended. All results for sediment sample analysis will be presented on dry weight basis.

1.8 Internal Quality Control Checks

The internal quality control procedures will consist of the following:

Instrument Calibration

Sediment. Instrument calibration and standards as defined in the EPA CLP SOWs for organic and inorganic analyses, the quality control specifications outlined in the laboratories' SOPs and analytical methods as described in Sections 1.6 and 1.7 will be followed.

Blanks

Method Blank. Laboratory method blank measurements at a minimum frequency of 5 percent or one per analytical batch, whichever is greater. An analytical batch contains a maximum of 20 field samples and consists of one or more SDGs.

Rinseate Blank. One rinseate blanks will be collected and analyzed for metals, semivolatiles, VOAs, pesticides and PCBs. Sampling equipment will be rinsed with deionized water and the rinseate will be placed in a sample container for analyses. Analyses of the rinseate blanks will be according to methods as specified in Table 1-2 with appropriate modifications to sample preparation for the water matrix. Rinseate blanks will be used to determine if any cross contamination has occurred during sampling.

Accuracy and Precision

Duplicates/Replicates. Two field duplicates will be collected and used to evaluate laboratory and field precision.

Matrix Spike/Matrix Spike Duplicates. MS/MSD or lab duplicate measurements will be performed at a minimum frequency of 5 percent or one per analytical batch. The acceptance criteria are presented in Tables 1-3 and 1-4. The estimated number of QC samples is presented in Table 1-6.

Reports

Data reports will include a Quality Control Data Review for each analytical batch. CLP documentation for each analysis, as described in the EPA SOWs for organic and inorganic analysis (EPA, 1991 and undated, respectively), or according to the laboratory QA/QC procedures described in previous sections when modifications to CLP procedures are used, will be provided at request of the EPA project coordinator. For non-CLP procedures, data reports will include necessary information and raw data (see Section 2.9) to allow reviewer to perform a QA/QC review equivalent to CLP review, unless the EPA project coordinator approves a modified data report.

All original data records will be maintained at the City laboratory for a period of at least five years from the time fo sampling.

1.9 Data Reduction, Validation, and Reporting

All data will undergo quality assurance/quality control evaluation. Data reduction, evaluation, and reporting at the laboratory will be carried out as described in the EPA CLP SOWs for organic and inorganic analysis (EPA, 1991 and undated, respectively) or based on the analytical laboratory in-house protocols when CLP procedures are not used or not defined. The laboratory protocols are presented in the laboratory SOPs.

Data Reduction, Validation, and Reporting

Sediment - Laboratory Data Validation. All analysts are required to complete a QC Non-Conformance Memo documenting that corrective action has been taken when quality control indicators fall outside of control limits. An in-control analysis requires no further action. A memo noting out-of-control circumstances must be reviewed and initialed by the Quality Control Officer (QCO). The QCO may concur with the corrective actions already initiated by the analyst, or may require that further action be taken. If reanalysis is required, the review process is repeated.

After the QC Non-Conformance Memo has been reviewed and accepted (which may occur after reanalysis), the report of test results, associated quality control results, raw data, and QC memos are transferred to the laboratory manager for review. The lab manager accepts the data, initialing it, or rejects the data based on criteria such as surrogate and MS/MSD recovery values, data package completeness, calibration, and correctly calculated sample results. If rejected, the data are returned to the analyst via the QCO and reanalysis may be performed. After the analyst, QCO and lab manager (if out of control events occurred) have accepted the data, the final report is prepared.

Laboratory data flags, or qualifiers, are applied following the lab SOPs and EPA CLP protocols for organic and inorganic analyses. These data flags may have different meanings than those commonly employed by non-laboratory data reviewers. The flags will be defined in the accompanying case narrative.

Detection Limits and Quantitation Limits

In general, detection limits will reflect the lowest levels of analyte that can be accurately and reproducibly detected by the analytical method employed. Data for each target compound generated in accordance with the EPA SOW for organics and inorganics analysis (EPA, 1992a and 1992b) will be reported with a sample quantitation limit (SQL) by the lab for this project. The SQL is defined as follows:

SQL = The lowest reproducible concentration at which a chemical can be accurately and reproducibly quantitated for a given sample. The SQL can vary from sample to sample depending on sample size, matrix interferences, moisture content, and other sample-specific conditions.

SQLs may be adjusted for a specific sample as a result of adjustments to the preparation or analytical method (i.e., sample dilution, sample matrix or variations in sample mass or volume extracted). Because SQLs take into account sample characteristics (i.e., matrix effects), sample preparation, and analytical adjustments, these values are the most relevant quantitation limit for evaluating non-detected chemicals.

Data Qualifiers

The data will be qualified by the laboratory in accordance with established control limits (lab SOPs and QC Manual) and with CLP laboratory data qualifier definitions for inorganic and organic chemical data (EPA, 1991 and undated). Additional laboratory data qualifiers may be defined and reported in order to more completely explain the laboratory's quality control concerns regarding a particular sample result. All additional data qualifiers will be defined in the laboratory's case narrative reports associated with each case.

1.10 Performance and System Audits

The Laboratory Manager and Project Coordinator will monitor the performance of the field and laboratory quality assurance program. This will be achieved through regular contact with the field and analytical QA officers.

Field Performance

Field performance will be monitored through review of sample collection documentation, sample handling records (chain of custody forms), field notebooks, and field measurements.

1.11 Preventative Maintenance

Field Preventative Maintenance

Preventative maintenance of field instruments and equipment will follow manufacturer's specifications. All routine maintenance will be recorded in instrument log books or directly on the instrument as appropriate.

Analytical Laboratory Preventative Maintenance

Preventative maintenance in the laboratory will be the responsibility of the laboratory personnel and analysts. This maintenance includes routine care and cleaning of instruments and inspection and monitoring of carrier gases, solvents, and glassware used in analyses.

Precision and accuracy data are examined for trends and excursions beyond control limits to determine evidence of instrument malfunction. Maintenance will be performed when an instrument begins to change as indicated by the degradation of peak resolution, shift in calibration curves, decrease in sensitivity, or failure to meet one or another of the quality control criteria. Details of the maintenance procedures for laboratories will be addressed in the laboratory Quality Control Manual(s).

1.12 Specific Routine Calculations to be Used to Assess Data Precision, Accuracy, and Completeness

Data assessment will be based on the data quality objectives. This will include data validation procedures described in this attachment. The quantitative definitions of precision, accuracy, and completeness are presented in this section.

Precision

The results from matrix spikes and matrix spike duplicate analyses will be used to determine the relative percent difference (RPD) between the pair of analyses. This is a measure of analytical precision and can be calculated as follows:

$$RPD = \frac{(C_1 - C_2)}{(C_1 + C_2)/2} \times 100$$

Where:

RPD = relative percent difference
C₁ = larger of the two observed values
C₂ = smaller of the two observed values

Accuracy

For spiked samples, the percent recovery (%R) can be used as the measure of accuracy as follows:

$$\%R = 100 \times (S-U) / C_{sa}$$

Where: %R = percent recovery
C_{sa} = actual concentration of spike added
S = measured concentration in spiked aliquot
U = measured concentration in unspiked aliquot

Completeness

Measurement of completeness (C) can be defined as the ratio of acceptable measurements obtained to the total number of planned measurements for an activity. Completeness can be defined as:

$$\%C = \frac{\text{(Number of acceptable data points)}}{\text{(Total Number of data points)}} \times 100$$

1.13 Corrective Action

If quality control audits result in detection of unacceptable conditions or data, the project quality assurance coordinator will be responsible for implementing corrective action and EPA will be notified immediately. Specific corrective actions are outlined in each respective EPA CLP SOW or method and include but are not limited to the following:

- Identifying the source of the violation;
- Re-analyzing or re-extracting samples if holding time criteria permit;
- Resampling;
- Evaluating and amending sampling and analytical procedures; and/or
- Accepting data and flagging to indicate the level of uncertainty.

Corrective actions may also be initiated as a result of other QA activities, including:

- Performance audits;
- System audits; and
- Laboratory/interfield comparison studies.

1.14 Quality Assurance Reports

After data have been received and evaluated by the City Laboratory Manager, a report summarizing the specific QC checks will be written. This summary will also include:

- Validated data;
- Assessment of measurement data precision, accuracy, and completeness;
- Results of system and performance audits; and
- Significant QA problems and recommended solutions.

This report will be submitted to the laboratory manager for final confirmation of the validity of the data. These reports will be included in the Data Report.

**Table 1-2
Methods of Analysis and Detection Limit Goals**

Analyte	SQO	Detection Limit Goals (§)	Test Methods	
			Reference	Method
<u>CONVENTIONALS & MISC.</u>				
Total Solids		1 %	SM	2540 G
Total Vol Solids		1 %	SM	2540 E
Total Organic Carbon		0.1 %	SW 846	9060 with I.R.
Ammonia		50 ppm	MCAWW	350
pH		NA	SW 846	9045
Sulfide		NA	PSEP	NA
Grain Size		NA	ASTM	D-422
<u>METALS in mg/kg (ppm)</u>				
Antimony	150	100	CLP	SOW ILM03.0 (11)
Arsenic	57	1	CLP	SOW ILM03.0 (1)
Chromium		1.2	CLP	SOW ILM03.0 (1)
Mercury	0.59	0.1	CLP	SOW ILM03.0
Silver	6.1	1	CLP	SOW ILM03.0 (1)
Copper	390	2.5	CLP	SOW ILM03.0 (1)
Nickel	140	4	CLP	SOW ILM03.0 (1)
Cadmium	5.1	1	CLP	SOW ILM03.0 (1)
Lead	450	0.6	CLP	SOW ILM03.0 (1)
Zinc	410	2	CLP	SOW ILM03.0 (1)
Tributyltin (as Tin) in µg/kg (ppb)		30	Laucks SOP	3550/8270 (7)
<u>PHENOLS & SUB PHENOLS in µg/kg (ppb)</u>				
Phenol	420	100	CLP	SOW OLM01.8 (2)
2-Methylphenol	63	55	CLP	SOW OLM01.8 (2)
4-Methylphenol	670	100	CLP	SOW OLM01.8 (2)
2,4-Dimethylphenol	29	29	CLP	SOW OLM01.8 (2,9)
Pentachlorophenol	360	200	CLP	SOW OLM01.8 (2)
<u>LPAHs in µg/kg (ppb)</u>				
Naphthalene	2100	100	CLP	SOW OLM01.8 (2)
2-Methylnaphthalene	670	100	CLP	SOW OLM01.8 (2)
Acenaphthylene	1300	100	CLP	SOW OLM01.8 (2)
Acenaphthene	500	100	CLP	SOW OLM01.8 (2)
Fluorene	540	100	CLP	SOW OLM01.8 (2)
Phenanthrene	1500	100	CLP	SOW OLM01.8 (2)
Anthracene	960	100	CLP	SOW OLM01.8 (2)
<u>HPAHs in µg/kg (ppb)</u>				
Fluoranthene	2500	100	CLP	SOW OLM01.8 (2)
Pyrene	3300	100	CLP	SOW OLM01.8 (2)
Benzo(a)anthracene	1600	100	CLP	SOW OLM01.8 (2)
Chrysene	2800	100	CLP	SOW OLM01.8 (2)
Total Benzofluoranthene (10)	3600	100	CLP	SOW OLM01.8 (2)
Benzo(a)pyrene	1600	100	CLP	SOW OLM01.8 (2)
Indeno(1,2,3-cd)pyrene	690	100	CLP	SOW OLM01.8 (2)
Dibenzo(a,h)anthracene	230	100	CLP	SOW OLM01.8 (2)
Benzo(g,h,i)perylene	720	100	CLP	SOW OLM01.8 (2)

**Table 1-1
Personnel Responsible for Quality Assurance Activities**

<u>Personnel</u>	<u>Responsibilities</u>
<i>EPA Project Manager</i> Mary Kay Voytilla	Oversee project performance and compliance with EPA objectives.
<i>Analytical Laboratory Manager</i> Christopher Getchell	Oversee laboratory analytical performance to ensure compliance. Implement necessary action and adjustments to accomplish analytical project objectives.
<i>Laboratory QA Officer</i> Judy Murray	Ensure the use of proper analytical procedures; ensure all quality control indicators are within control limits specified; initiate corrective action.
<i>City of Tacoma Project Coordinator</i> Greg Zentner	Coordinate City activities to implement required work.

**Table 1-2
Methods of Analysis and Detection Limit Goals**

Analyte	SQO	Detection Limit Goals (8)	Test Methods Sediments	
			Reference	Method
<u>CHLOR. AROMATICS in $\mu\text{g}/\text{kg}$ (ppb)</u>				
1,3-Dichlorobenzene	170	100	CLP	SOW OLM01.8 (2,3)
1,4-Dichlorobenzene	110	100	CLP	SOW OLM01.8 (2,3)
1,2-Dichlorobenzene	50	45	CLP	SOW OLM01.8 (2,3)
1,2,4-Trichlorobenzene	51	30	CLP	SOW OLM01.8 (2,3)
Hexachlorobenzene	22	8	CLP	SOW OLM01.8 (4,6)
<u>CHLOR. ALIPHATICS in $\mu\text{g}/\text{kg}$ (ppb)</u>				
Hexachlorobutadiene	11	8	CLP	SOW OLM01.8 (4,6)
<u>PHTHALATE ESTERS in $\mu\text{g}/\text{kg}$ (ppb)</u>				
Dimethyl phthalate	160	100	CLP	SOW OLM01.8 (2)
Diethyl phthalate	200	100	CLP	SOW OLM01.8 (2)
Di-n-butyl phthalate	1400	100	CLP	SOW OLM01.8 (2)
Butylbenzylphthalate	900	100	CLP	SOW OLM01.8 (2)
Bis(2-ethylhexyl)phthalate	1300	100	CLP	SOW OLM01.8 (2)
Di-n-octyl phthalate	6200	100	CLP	SOW OLM01.8 (2)
<u>MISC. OXY. COMPOUNDS in $\mu\text{g}/\text{kg}$ (ppb)</u>				
Benzyl alcohol	73	50	CLP	SOW OLM01.8 (2)
Benzoic acid	650	500	CLP	SOW OLM01.8 (2)
Dibenzofuran	540	100	CLP	SOW OLM01.8 (2)
N-nitrosodiphenylamine	28	28	CLP	SOW OLM01.8 (2,9)
<u>VOLATILE ORGANICS in $\mu\text{g}/\text{kg}$ (ppb)</u>				
Tetrachloroethene	57	20	CLP	SOW OLM01.8 (2)
Trichloroethene		20	CLP	SOW OLM01.8 (2)
Ethylbenzene	10	10	CLP	SOW OLM01.8 (2)
Total xylenes	40	20	CLP	SOW OLM01.8 (2)

**Table 1-2
Methods of Analysis and Detection Limit Goals**

Analyte	SQO	Detection Limit Goals (8)	Test Methods Sediments	
			Reference	Method
PESTICIDES/PCBs in $\mu\text{g}/\text{kg}$ (ppb)				
Total PCBs	150	80	CLP	SOW OLM01.8 (5,6)
4,4'-DDE	9	8	CLP	SOW OLM01.8 (6)
4,4'-DDD	16	8	CLP	SOW OLM01.8 (6)
4,4'-DDT	34	8	CLP	SOW OLM01.8 (6)
Chlordane (alpha, gamma)		8	CLP	SOW OLM01.8 (6)
Aldrin		8	CLP	SOW OLM01.8 (6)
Dieldrin		8	CLP	SOW OLM01.8 (6)
Heptachlor		8	CLP	SOW OLM01.8 (6)
Lindane		8	CLP	SOW OLM01.8 (6)

Notes:

- (1) CLP digestion is 1gm/200 ml. Our digestion would be 1 gm/100 ml.
- (2) Target analytes detected below the established linear range of the instrument but meeting the mass spectral identification criteria will be J-flagged as estimate values.
- (3) Determined in the ABNs analysis.
- (4) Determined in the pesticide fraction.
- (5) Total values are calculated by summing concentrations above detection limits. Concentrations not detected at the detection limit value will not be included.
- (6) Modified as necessary for the limited target analyte list and including any or all of the following cleanups: florasil cleanup; SW 846 Method 3620; sulfite sulfur cleanup; or elemental mercury cleanup for sulfur.
- (7) Based on Krone et al., 1989 (NOAA) A method for analysis of Butyltin species and measurement of butyltins in sediment and English Sole Livers from Puget Sound. Modified to achieve required DLG (SOP).
- (8) Based on dry weight with assumption of sediment moisture content <50%.
- (9) Detection limit goal is below analyte's method detection limit. Samples with no semivolatile target analytes detected above the SQO value(s) will be reanalyzed, subsequent to further concentration of the sample extract, as a means to achieve detection limit goals. Please note that detection limits are highly matrix dependent, and may not always be achievable.
- (10) Sum of benzo(b)fluoranthene and benzo(k)fluoranthene.
- (11) Antimony will be analyzed along with other metals; however, QC criteria will not be enforced to reanalyze the sample.

SM	Standard Methods, 18th Edition
DLG	Detection Limit Goals
CLP	Contract Laboratory Program
MCAWW	Methods for the Chemical Analysis of Water and Waste
PSEP	Puget Sound Estuary Program

Actual Sample Detection Limits may vary from Method Detection Limits depending on the influences of limited sample volume, matrix interferences, blank contamination, and moisture content of sediments.

Table 1-3
Quality Assurance Objectives
Accuracy and Precision of Matrix Spike,
Matrix Spike Duplicates, and Lab Duplicates for Sediments

Analyte	Acceptance Criteria		Analyte	Acceptance Criteria	
	Accuracy (% Recovery)	Precision (RPD)		Accuracy % Recovery	Precision (RPD)
METALS			PESTICIDES/PCBs		
Antimony	30 - 150	30	4,4'-DDT	23 - 134	50
Arsenic	60 - 128	35	gamma-BHC (Lindan)	46 - 127	50
Chromium	25 - 125	20	Heptachlor	35 - 130	31
Mercury	75 - 125	20	Aldrin	34 - 132	43
Silver	75 - 125	20	Dieldrin	31 - 134	38
Copper	75 - 125	20	Endrin	42 - 139	45
Nickel	75 - 125	20			
Cadmium	75 - 125	20	VOLATILE ORGANICS		
Lead	75 - 125	20	Trichloroethene	62 - 137	24
Zinc	75 - 125	20	Benzene	66 - 142	21
Tributyltin(1)	20 - 160	50	Toluene	59 - 139	21
			Chlorobenzene	69 - 133	21
CONVENTIONALS			1,1-Dichloroethane	59 - 172	22
Total Organic Carbon	50 - 150	20			
Ammonia(2)	50 - 128	30			
Sulfide(2)	50 - 150	30			
Semi-Volatiles (ABNs) BY GC/MS					
1,2,4-Trichlorobenzene	38 - 107	23			
1,4-Dichlorobenzene	28 - 104	27			
Acenaphthene	31 - 137	19			
Pentachlorophenol	17 - 109	47			
Phenol	26 - 90	35			
Pyrene	35 - 142	36			
n-Nitroso-di-n-propylamin	41 - 126	38			
2-Chlorophenol	25 - 102	50			
4-Chloro-3-methylphenol	26 - 103	33			
4-Nitrophenol	11 - 114	50			
2,4-dinitrotoluene	28 - 89	47			

Note:

- * When an upper control limit has been statistically established as less than 100%, the analysis is considered in control up to a limit of 120%.
- (1) Tributyltin analysis control limits are in-house default limits due to inadequate number of data points for statistical determination (sonic horn technique).
- (2) According to lab SOPs.

Table 1-4
Quality Assurance Objectives
Surrogate Recoveries for Sediments

Analyte	Acceptance Criteria (%Recovery)
TRIBUTYLTIN by GC/MS	
Tritropyltin	20 - 160
ABNs by GC/MS	
2-Fluorobiphenyl	30 - 115
2-Fluorophenol	25 - 121
2,4,6-Tribromophenol	19 - 122
d14-p-Terphenyl	18 - 137
d5-Nitrobenzene	23 - 120
d5-Phenol	24 - 113
d4-2-Chlorophenol	20 - 130*
d4-1,2-Dichlorobenzene	20 - 130*
PESTICIDES/PCBs	
Tetrachloro-m-xylene	60 - 150*
Decachlorobiphenyl	60 - 150*
VOAs by GC/MS	
d8-Toluene	84 - 138
Bromofluorobenzene	59 - 113
d4-1,2-Dichloroethane	70 - 121

* Advisory

Table 1-5
SRM/CRM Recovery Acceptance Criteria

Analyte	Accuracy (1) (% Recovery or range in µg/kg)
Metals	MESS-2
Antimony	80-120%
Arsenic	80-120%
Cadmium	80-120%
Chromium	80-120%
Copper	80-120%
Lead	80-120%
Mercury	80-120%
Nickel	80-120%
Silver	80-120%
Zinc	80-120%
Base/Neutrals	ERA 327
Anthracene	2530 - 8490
Benzo(k)fluoranthene	2310 - 5700
4-Chlorophenyl-phenylether	3040 - 6390
Chrysene	1270 - 3690
Di-n-octylphthalate	2580 - 11800
Dibenzofuran	2700 - 7790
1,2-Dichlorobenzene	1060 - 13800
2,4-Dinitrotoluene	2910 - 8970
bis(2-Ethylhexyl)phthalate	1450 - 3620
Fluorene	4070 - 11400
Naphthalene	787 - 3990
Phenanthrene	1810 - 5180
Pyrene	1900 - 5430
1,2,4-Trichlorobenzene	1230 - 6810
Acids	ERA 327
2-Chlorophenol	1650 - 5410
2,4-Dichlorophenol	5080 - 12300
2-Methylphenol	2150 - 13200
Pentachlorophenol	1980 - 10600
2,4,6-Trichlorophenol	2790 - 7650
Pesticides	ERA 327
Aldrin	191 - 402
beta-BHC	183 - 443
4,4'-DDD	133 - 334
4,4'-DDE	257 - 534
4,4'-DDT	161 - 471
Dieldrin	187 - 465
Endrin	113 - 274
Heptachlor	82.1 - 167
Heptachlor Epoxide	166 - 591

(1) Note: No sample will be reanalyzed and no data will be rejected based on SRM/CRM results alone.

**Table 1-6
Summary of Field and QC Samples**

Parameter	Field Samples							Lab Samples		
	Trench	Upland Test Pit	Bank	Intertidal Grab	Intertidal Core	Duplicate	Rinseate	Matrix Spike	CRM/ SRM	Total # Analytes
Grain Size	5	8	8	2	6	2				31
TS		8		2	6	2				18
pH		8		2	6	2				18
TOC		8		2	6	2				18
TVS		8		2	6	2				18
Sulfides		8		2	6	2	1	1	1	21
Ammonia		8		2	6	2	1	1	1	21
Metals	5	8	8	2	6	2	1	1	1	34
VOAs	5	8	8	2	6	2	1	1	1	34
Semi-VOA	5	8	8	2	6	2	1	1	1	34
Pest/PCB	5	8	8	2	6	2	1	1	1	34
TBT				2	6	2	1	1	1	9

Sample Type Sample Purpose

Trench Characterize soils in the 12-18 ft. MLLW horizon. Data will be used to define soil disposal or reuse options.

Test pit Characterize material in the horizons (8-10 ft MLLW and 10-12 ft MLLW) bracketing the future intertidal surface.

Bank Characterize the material evident in the bank, in strata that is obviously contaminated and in strata below that is not. Sampling of these two bank strata will be used, in conjunction with pit and trench sampling, to characterize the extent of on site contamination.

Core and Grab Samples (Tideflats) Define the nature of the surrounding aquatic environment. These samples in essence provide context for restoration planning at the project sit.