

Early Action Cleanup Alternatives

January 2026

The U.S. Environmental Protection Agency is conducting an engineering evaluation and cost analysis for the Terminal 25 South Site (T-25S site). An EE/CA is a document that describes and evaluates the different cleanup options and also discusses the cleanup alternative preferred by EPA.

What is the T-25S Site?

The T-25S site is north of the Spokane Street Bridge, partially within the East Waterway, which is about one mile south of downtown Seattle. The East Waterway Operable Unit (East Waterway) is one of seven operable units of the Harbor Island Superfund site being addressed for cleanup by EPA. The East Waterway and the T-25S site are connected to Elliott Bay and the Lower Duwamish Waterway.

The T-25S site includes five acres of submerged area within the East Waterway. This area includes a creosote-treated wood piling field within the waterway (Figure 2 on page 3). The T-25S site also includes five acres of upland area that was the site of former industrial activities.

Following the cleanup activities to remove contaminated sediments and soil, the Port of Seattle plans to restore habitat by creating off-channel marsh and shoreline habitat for fish and wildlife (Figures 2 and 3).

What is EPA's preferred cleanup alternative?

EPA's preferred cleanup alternative for the T-25S site includes (see Figure 4):

- Removal of all pilings and other debris from the in-water portion of the site, followed by dredging between 3 and 11 vertical feet of sediments with contamination exceeding the Remedial Action Levels (RALs) established for the East Waterway.
- Full excavation of upland soils with contamination greater than the East Waterway RALs.
- After dredging and excavation, removed material will be disposed according to applicable regulations.
- Clean material will replace all dredged and excavated areas, with a sand layer cover in dredged areas, a rock armor layer placed along the subtidal slope, and clean fill placed to construct the mudflat and marsh habitat area.

EPA anticipates the T-25S site cleanup will begin in 2028. The estimated cost to implement the preferred alternative is \$99 million.

Community Involvement Opportunities

30-Day Public Comment Period

January 26 – February 25, 2026

You can provide comments on the T-25S site EE/CA using the following methods:

By Mail:

ATTN: T-25S Site EE/CA
c/o Laura Knudsen
U.S. EPA Region 10, 1200 Sixth Avenue, Suite 155
Superfund Records Center, Mail Stop 17-C04-1
Seattle, WA 98101

By Email: Region10@epa.gov

Learn more about the T-25S site EE/CA:

Please visit EPA's Harbor Island website at www.epa.gov/superfund/harbor-island for the most up-to-date information on:

- This **public comment period**
- **Supporting materials**, including the full T-25S Site EE/CA

To receive updates on the T-25S Site EE/CA by email, please contact Laura Knudsen at knudsen.laura@epa.gov.

EPA Region 10 Contacts:

Dustan Bott, Remedial Project Manager
206-553-5502, bott.dustan@epa.gov

Laura Knudsen, Community Involvement Coordinator
206-553-1838, knudsen.laura@epa.gov

Port of Seattle Contact:

Joanna Florer, Sr Manager, Environmental Programs
206-612-9540, florer.j@portseattle.org

What is a Remedial Action Level (RAL)?

A RAL is a level of contamination that helps identify and prioritize the most contaminated spots to help achieve future cleanup level goals over the entire project area.

What are the contaminants of concern at the T-25S Site?

Previous investigations of sediment and soil at the T-25S site identified polychlorinated biphenyls as the primary contaminant of concern, although polycyclic aromatic hydrocarbons, and dioxins/furans are also present.

What is the EE/CA Process?

EPA may conduct early cleanup actions known as Non-Time-Critical Removal Actions via the EE/CA process to more quickly reduce risks at sites when there are high concentrations of pollutants to protect people's health and the environment. Conducting an EE/CA requires a site assessment, risk evaluation, and comparison of cleanup alternatives (see Figure 1).

The T-25S site EE/CA proposes three removal action alternatives to address contamination at the site. The three alternatives include varying levels of removal, backfill, and capping any remaining contamination. As described in the East Waterway Interim Record of Decision, sediments with contaminant concentrations greater than the RAL will be addressed through active remediation. This applies to all alternatives in the EE/CA.

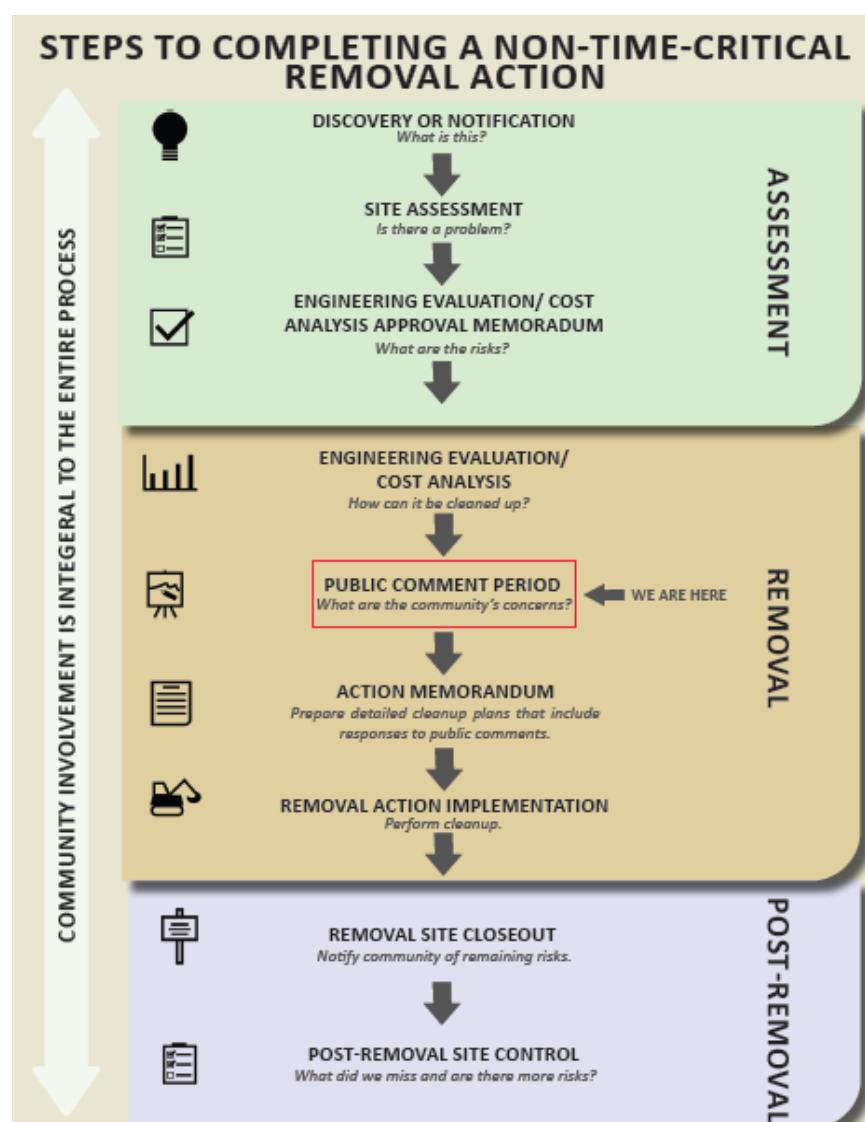


Figure 1. Steps to Completing a Non-Time-Critical Removal Action

Is there anything else planned for the T-25S Site area?

Following cleanup and restoration, the T-25S site will be reserved for fish and wildlife use with routine monitoring and maintenance of the restored habitat area. EPA will work with the East Waterway Group to conduct remaining cleanup actions in adjacent waterway areas required under the East Waterway Interim Record of Decision.

Get involved!

You are encouraged to review and comment on all the alternatives in the T-25S site EE/CA, which can be found on EPA's Harbor Island website: www.epa.gov/superfund/harbor-island

Community involvement is a crucial part of cleaning up EPA Superfund sites. EPA will consider public comments when selecting a cleanup action for the T-25S site. EPA may modify the preferred cleanup action or select another removal action alternative based on new information or public comments and then issue an Action Memorandum. The Action Memorandum will summarize the results of the EE/CA and select the removal action to be performed at the T-25S site area.



Figure 2. Existing Conditions at the Terminal 25 South site (Source: Port of Seattle)



Figure 3. Conceptual image of the Restoration of Intertidal and Shallow Subtidal Habitats at the Terminal 25 South site (Source: Anchor QEA)

EPA's Preferred Cleanup Alternative

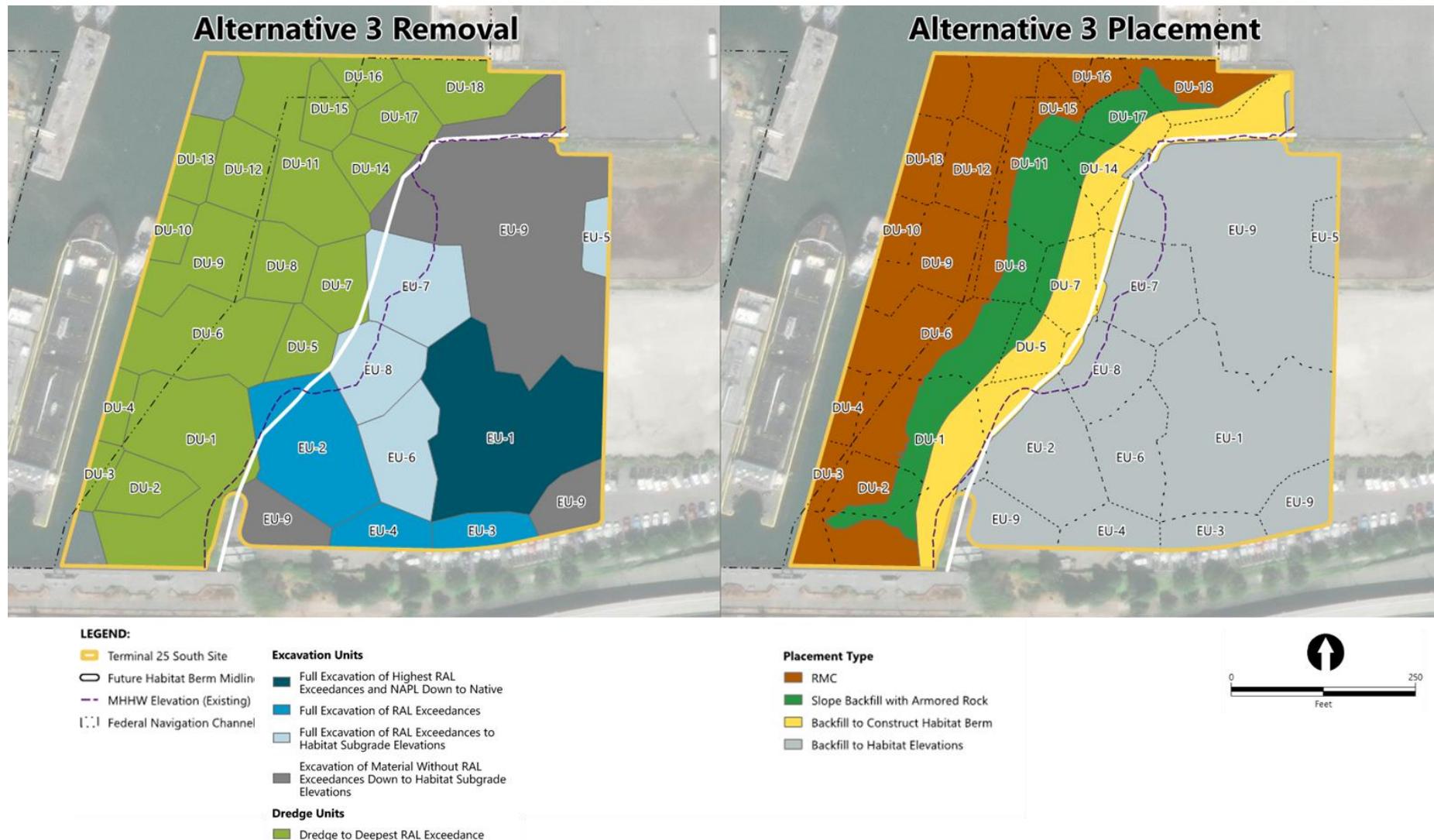


Figure 4. EPA's Preferred Cleanup (Alternative 3) for the In-Water and Upland Portions of the Terminal 25 South site (Source: Anchor QEA)