



## **Public Participation Plan**

**Goldendale Energy Storage Project  
Columbia Gorge Aluminum Site**



**Solid Waste Management Program**

Washington State Department of Ecology

Industrial Section

Lacey, Washington

May 2022



# Public Participation Plan Goldendale Energy Storage Project

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## Columbia Gorge Aluminum Site

By

Industrial Section

For the

**Solid Waste Management Program**

Washington State Department of Ecology  
Olympia, Washington

May 2022

## Publication Information

This document is available on the Department of Ecology's website at:  
<https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=11797>

### Cover photo credit

- Garin Schrieve, Picture of West Surface Impoundment, Columbia Gorge Aluminum Site, April 28, 2021

### Related Information

- Cleanup site ID: 11797
- Facility site ID: 95415874

## Contact Information

### Solid Waste Management Program

#### Industrial Section

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Olympia, WA 98504-7600

Phone: 360-407-6000

**Website**<sup>1</sup>: [Washington State Department of Ecology](http://www.ecology.wa.gov/contact)

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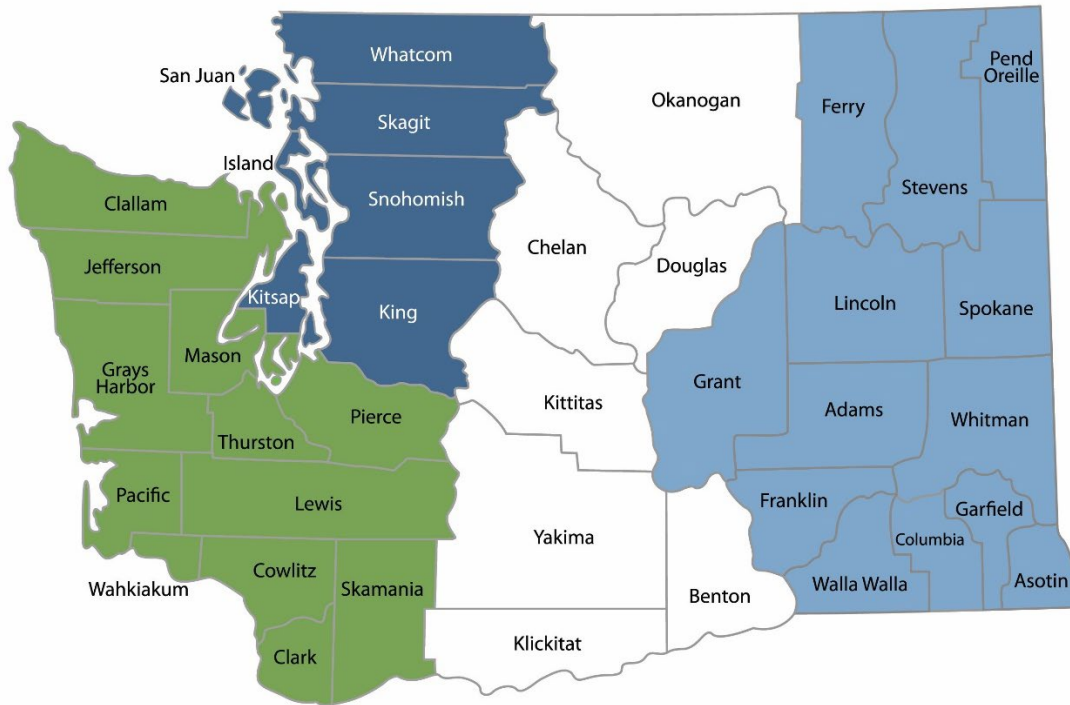
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<sup>1</sup> [www.ecology.wa.gov/contact](http://www.ecology.wa.gov/contact)

To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at [ecyadacoordinator@ecy.wa.gov](mailto:ecyadacoordinator@ecy.wa.gov). For Washington Relay Service or TTY call 711 or 877-833-6341. Visit Ecology's website for more information.

# Department of Ecology's Regional Offices

## Map of Counties Served



<b>Southwest Region</b> 360-407-6300	<b>Northwest Region</b> 206-594-0000	<b>Central Region</b> 509-575-2490	<b>Eastern Region</b> 509-329-3400
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Region	Counties served	Mailing Address	Phone
<b>Southwest</b>	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
<b>Northwest</b>	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
<b>Central</b>	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
<b>Eastern</b>	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
<b>Headquarters</b>	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

# Public Participation Plan

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## Goldendale Energy Storage Project Columbia Gorge Aluminum Site

Solid Waste Management Program  
Washington State Department of Ecology  
Industrial Section  
Lacey, WA

**May 2022**



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

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# Public Involvement in Contamination Cleanup

The Washington State Department of Ecology (Ecology) developed this public participation plan (plan) in cooperation with FFP Project 101, LLC (FFP), which proposes to build the Goldendale Energy Storage Project on a portion of the Columbia Gorge Aluminum smelter cleanup site in Klickitat County. The purpose of the plan is to promote meaningful community involvement during cleanup of the project's proposed location. This plan is focused only on the activities related to cleanup of contamination. The project requires other governmental permits and approvals, each with their own opportunities for public review and input. More information about the environmental review of the entire project is available on Ecology's project [webpage](#).

<sup>2</sup>

This plan describes ways Ecology will inform the public about contamination investigations and cleanup options throughout the cleanup process. We encourage the public to learn about and get involved in decision-making opportunities. This plan identifies how and when the public can get involved during different stages of the investigation and cleanup of contamination.

## Site contacts

We appreciate feedback on this plan. Questions about the site are welcome anytime. If you would like your comments to be included for the record on the cleanup, please participate in Ecology's formal comment periods about the cleanup when they are advertised and scheduled.

### Ecology

Industrial Section  
P.O. Box 47600  
Olympia, WA 98504-7600  
Garin Schrieve, site manager  
[garin.schrieve@ecy.wa.gov](mailto:garin.schrieve@ecy.wa.gov)  
360-338-2638  
Angela Fritz, public involvement  
coordinator  
[angela.fritz@ecy.wa.gov](mailto:angela.fritz@ecy.wa.gov)  
360-280-4325

### FFP

FFP Project 101, LLC  
C/O Rye Development  
830 NE Holladay St.  
Portland, OR 97232  
Primary Point of Contact:  
Erik Steimle  
(503) 998-0230  
[erik@ryedevelopment.com](mailto:erik@ryedevelopment.com)  
Secondary Points of Contacts:  
Sandy Slayton  
[sandy@ryedevelopment.com](mailto:sandy@ryedevelopment.com)  
Brian Wright  
[bwr@cisc.dk](mailto:bwr@cisc.dk)

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<sup>2</sup> <https://ecology.wa.gov/Goldendale-Energy-SEPA>

## Public Participation Grants

Grants may be available to neighborhood committees, non-profits, and other individuals or groups interested in the site who meet [specific requirements](#).<sup>3</sup> For contaminated sites, these funds can be used to:

- Hire an expert to help interpret technical information.
- Conduct activities that enhance the public's understanding of, and participation in, the cleanup process.

For more information about public participation grants, please contact Faith Wimberley at 425-275-7285 or [faith.wimberley@ecy.wa.gov](mailto:faith.wimberley@ecy.wa.gov). You may also visit the [Public Participation Grant website](#).<sup>4</sup>

## Washington's Cleanup Laws

Ecology uses the Model Toxics Control Act (MTCA) and accompanying regulations for cleanup activities, including investigation and corrective action at Resource Conservation and Recovery Act (RCRA) sites.

This plan is required under MTCA, a law that passed in 1989. MTCA provides guidelines for contaminated site cleanup in Washington State and sets standards to ensure the cleanup protects human health and the environment.

### Model Toxics Control Act

MTCA began as a grassroots citizen's initiative in 1988, and started the process of systematically cleaning up contaminated sites in Washington. Under MTCA, a current or past property owner or operator may be held responsible for cleaning up contamination on, or coming from, their property to standards that are safe for human health and the environment.

Ecology enacts MTCA and oversees cleanups in the state and issues regulations and guidance governing those cleanups. The regulations are found in [Chapter 173-340 Washington Administrative Code \(WAC\)](#).<sup>5</sup> We investigate reports of property contamination, and if the contamination is seen as a significant threat to human health or the environment, the contaminated property is placed on the Hazardous Sites List, and the cleanup process begins.

Public participation is an important part of cleanup under the MTCA process. Participation needs are assessed at each cleanup site according to the level of public interest and the degree of risk posed by the contamination. Individuals who live near the site, community groups, businesses, government, other organizations, and interested parties have the opportunity to get involved by commenting on the cleanup process.

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<sup>3</sup> Washington Administrative Code 173-321-05-40. <https://app.leg.wa.gov/WAC/default.aspx?cite=173-321-040>

<sup>4</sup> [ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants](https://ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants)

<sup>5</sup> <https://fortress.wa.gov/ecy/publications/publications/9406.pdf>

Under MTCA, the cleanup process generally includes five phases. Each phase includes an opportunity for the public to review and comment on cleanup documents.

## State Environmental Policy Act

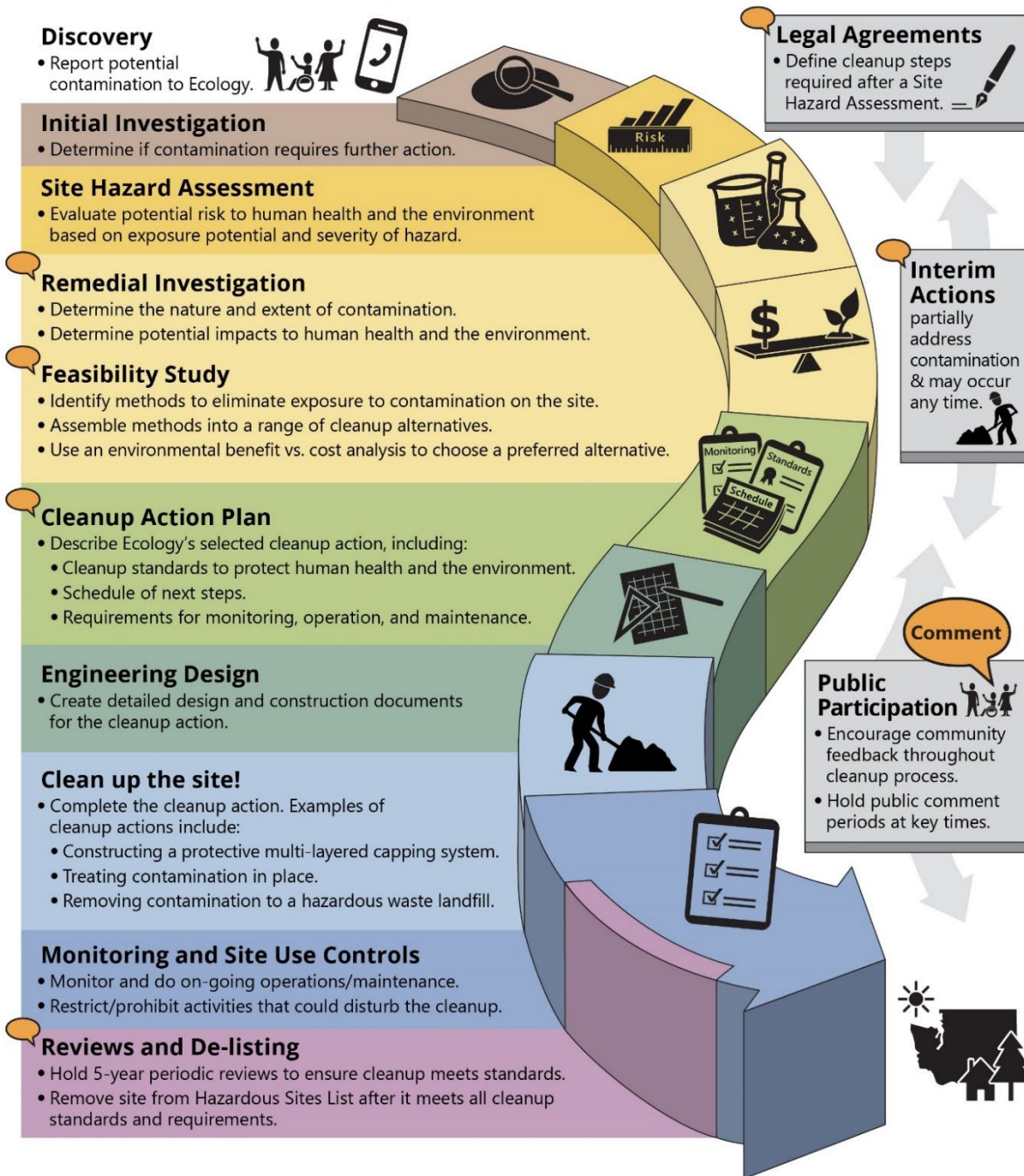
FFP is proposing to construct an energy storage project on this portion of the site. They have applied for a Prospective Purchaser Consent Decree to cleanup contamination if the redevelopment is approved.

Ecology is conducting a full evaluation of the proposed project's potential environmental impacts. Results of this evaluation will be available in a report called an environmental impact statement (EIS). We expect that the EIS will include impacts from cleanup activities required for this portion of the site. More information on the energy storage project and the environmental review process is available on Ecology's project [webpage](#).<sup>6</sup>

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<sup>6</sup> <https://ecology.wa.gov/Goldendale-Energy-SEPA>

# Washington's Formal Cleanup Process



 **Washington's Cleanup Law**  
Model Toxics Control Act (MTCA)

MTCA defines the cleanup process. This public-initiated environmental law directs upland cleanups (on land or in groundwater) and sediment cleanups (in freshwater or marine environments). Ecology enacts MTCA and regulates the cleanup process.

September 2019  
Ecology Publication 19-09-166

Figure 1: Steps in Washington's Cleanup Process<sup>7</sup>

<sup>7</sup> <https://apps.ecology.wa.gov/publications/SummaryPages/1909166.html>

# Site Information

## Land use

The former Columbia Gorge Aluminum Smelter (CGA) site is located in Klickitat County on the north side of the Columbia River approximately one mile northeast of the John Day Dam. The facility operated as an aluminum smelter from 1971 to 2003. Most of the structures at the site have since been demolished.

The footprint of the proposed energy project includes a portion of the former smelter site in an area that was historically used to manage the smelter's wastes.

## How the site became contaminated

Three decades of operation as an aluminum smelter resulted in soil and groundwater contamination in the operations and waste management areas at the site. Historic waste handling practices were the cause of most of the contamination.

## Contamination

The portion of the former smelter site proposed for the Goldendale Energy Storage Project includes the West Surface Impoundment, a closed industrial waste disposal facility. Groundwater in this area is impacted by sulfate and fluoride. Some soils under the impoundment may be contaminated from leakage during the time that the facility was in use.

## Cleanup plans

Ecology is currently working with FFP to develop a Remedial Investigation, Focused Feasibility Study, Cleanup Action Plan and Prospective Purchaser Consent Decree for the portion of the site proposed for the development of the Goldendale Energy Storage Project. FFP is proposing to clean up the project area by removing the West Surface Impoundment and any associated contaminated soil. The wastes and contaminated soil would be disposed off-site at a permitted landfill.

Ecology is also working with landowner, NSC Smelter, LLC. (NSC) and former owner/operator, Lockheed Martin Corporation (Lockheed), the Potentially Liable Parties (PLPs), under a MTCA agreed order to complete investigation and cleanup of the entire site. We are currently working to complete a Remedial Investigation for the entire site. A [separate Public Participation Plan](#)<sup>8</sup> describes the public involvement opportunities for the site-wide cleanup.

A thorough investigation and cleanup of this site is a high priority for Ecology. The cleanup will proceed regardless of the proposed energy project.

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<sup>8</sup> <https://fortress.wa.gov/ecy/gsp/DocViewer.aspx?did=26218>

## Area community

The area surrounding the site is rural and relatively isolated. It is sparsely populated, with no homes in or immediately adjacent to the proposed project. It is zoned predominantly for extensive agriculture with open space zoning along the Columbia River and adjacent steep terrain. Railroad Island Park is located to the south of the site and provides public access to Lake Umatilla.

## Environmental justice

Environmental justice is defined in Washington State as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, rules, and policies. This section discusses environmental justice as it relates to communities of color and low-income populations. Overburdened communities are vulnerable populations that face multiple combined environmental harms and health impacts.

Ecology uses demographic data to help identify potential impacts to overburdened populations. The area we examined to determine potential environmental justice impacts includes people living within 2 miles of the proposed project footprint within Washington State. This accounts for people that would most likely be affected by the cleanup. The analysis based on review of the Environmental Health Disparities layer of the Washington Tracking Network (WTN 2021<sup>9</sup>) did not find significant potential impacts to overburdened populations.

Ecology will reach out to cultural community organizations as part of our outreach and provide information in other languages as appropriate following federal guidance<sup>10</sup> and if requested. We strive to make our public participation efforts as inclusive as possible and welcome your input about how to best reach the nearby community, including translation and interpretation needs.

## Tribes

The area of land identified for the location of the proposed Goldendale Energy Project lies within the Ceded Lands of the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation). This area is a significant Traditional Cultural Property and has been of great importance to the Yakama Nation since time immemorial. Yakama Nation has Treaty reserved rights in this area under the Treaty of 1855. Members of Yakama Nation regularly exercise their treaty reserved rights to fish, hunt and gather foods and medicines throughout this area. The Yakama Nation and Ecology have a Memorandum of Understanding on how we will work together on state-led cleanup sites of interest to the tribe, and we are following the terms of that

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<sup>9</sup> <https://fortress.wa.gov/doh/wtn/WTNIBL/>

<sup>10</sup> Guidance to Environmental Protection Agency Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 69 Fed. Reg. § 35602 (June 15, 2004).

agreement for this site. We will work with Yakama Nation on all decision-making processes for this proposed project on a Government-to-Government basis.

## Public Participation Activities

Members of the public may ask questions, submit informal comments, or share site information at any time. Interested parties do not need to wait for a formal public comment period to contact Ecology.

However, to be included in the formal site record, comments about the site investigation, cleanup alternatives, or cleanups must be submitted during formal comment periods. In addition, the public is invited to review site documents before they become final. This is the most direct and influential way to learn more about the site and be involved in the cleanup's decision-making.

### How we share information with the community

During specific stages of the cleanup, Ecology will mail notices about public comment periods to addresses surrounding the site. The mailing list area will vary depending on the type of contamination and where it is located, but the list will at least include addresses within a 1/4-mile radius of the site and other interested organizations and individuals. These notices will provide general information about the site, contact information for submitting comments, and times and locations of public meetings or hearings or how to request one if not yet scheduled.

Ecology may also develop documents outside of comment periods to keep the community updated on the site's status. These informational documents will be available online and at document repositories. Print copies may be mailed to the nearby community if we feel the message warrants the associated cost and resources.

Comment period notices and other site announcements may also be posted in various locations throughout the community (for example, local businesses, schools, libraries).

### Postal mailing list

Ecology maintains a mailing list that includes addresses within a 2 mile radius of the site and relevant local, state, and federal government contacts.

These people receive public comment notices when draft documents are available.

We will add additional individuals, organizations, and other interested parties to the mailing list as requested. If you would like to be added to the mailing list for this site, please contact Angela Fritz at 360-280-4325 or [angela.fritz@ecy.wa.gov](mailto:angela.fritz@ecy.wa.gov).



## Email lists

You can [sign up to receive updates and formal email notices](#)<sup>11</sup> that we share on this cleanup action and the proposed energy project. If you would like to be added to the mailing list for this site, please contact Angela Fritz at 360-280-4325 or [angela.fritz@ecy.wa.gov](mailto:angela.fritz@ecy.wa.gov).

## Site Register

Public comment periods, events, and other cleanup notices are published in Ecology's [Site Register](#).<sup>12</sup> To receive the *Site Register* by email, please contact Sarah Kellington at 360-407-7466 or [sarah.kellington@ecy.wa.gov](mailto:sarah.kellington@ecy.wa.gov), or [subscribe online](#).<sup>13</sup>

## Newspaper display ads or legal notices

We announce public comment periods and events in ads or notices published in the Goldendale Sentinel, Tri-City Herald, Columbian, and Columbia Insight. We will also publish notice on our [Public Input & Events Listing](#).<sup>14</sup>

## Ecology's website and social media platforms

We maintain a [webpage](#) for the Columbia Gorge Aluminum site.<sup>15</sup> It provides site information, and you may download cleanup documents.

We may also share information about cleanup sites through [news releases, our blog, and social media](#).<sup>16</sup>

## Document repositories

During public comment periods, you can find print documents at the following locations:

Goldendale Community Library  
131 W Burgen Street  
Goldendale, WA 98620  
509-773-4487

Washington Department of Ecology  
Industrial Section  
300 Desmond Drive SE  
Lacey, WA 98504

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<sup>11</sup> [https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic\\_id=WAECY\\_92](https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_92)

<sup>12</sup> [ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data](https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data)

<sup>13</sup> <http://listserv.wa.gov/cgi-bin/wa?SUBED1=siteregister&A=1>

<sup>14</sup> [ecology.wa.gov/Events/Search/Listing](https://ecology.wa.gov/Events/Search/Listing)

<sup>15</sup> <https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=11797>

<sup>16</sup> [ecology.wa.gov/About-us/Get-to-know-us/News](https://ecology.wa.gov/About-us/Get-to-know-us/News)

To schedule an appointment to review files at Ecology's Lacey office, please contact Angelina Ward at 360-480-3782 or [angelina.ward@ecy.wa.gov](mailto:angelina.ward@ecy.wa.gov).

## **Signs around the cleanup site**

We may also install signs displaying information about project status, traffic impacts, and health risks around the cleanup site.

## **How to share information with us**

At minimum, MTCA requires 30-day public comment periods for draft cleanup documents and 14-day comment periods SEPA documents. SEPA documents are often made available for public review with other cleanup documents. In that case, we combine the comment periods, and they last at least 30 days. We may hold comment periods longer than 30 days.

We may also identify public concerns and cleanup goals by meeting with and soliciting information from interested community members and organizations. To collaborate with us about this site, please contact Garin Schrieve at 360-338-2638 or [garin.schrieve@ecy.wa.gov](mailto:garin.schrieve@ecy.wa.gov).

## **Public comment periods**

Formal 30 day comment periods allow interested members of the public to comment on draft documents, legal agreements, and proposed cleanup actions. If there is significant interest, Ecology may extend the public comment period. When Ecology oversees SEPA determinations, we hold comment periods for at least two weeks and may extend to 30 days or more when other cleanup documents are concurrently available for review.

Following a comment period, we publish all of the input we received and respond to significant comments and questions. If the comments result in significant changes to the cleanup documents, then the documents will be revised and be made available again for public review. If the comments do not result in significant changes, then they become final.

## **Public events**

We hold public meetings, workshops, open houses, and public hearings based on community interest. If we have not scheduled a meeting, we will hold one if a minimum of 10 people request it, and this may cause us to extend a public comment period so the meeting occurs during it.

Events are held online or at locations close to the site that meet Americans with Disabilities Act standards. Public meetings, workshops, open houses, and hearings are always announced in advance using a variety of methods.

## **Americans with Disabilities Act**

To request ADA accommodation for disabilities, or printed materials in a format for the visually impaired, contact the Ecology ADA Coordinator at 360-407-6831 or

ecyadacoordinator@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

## Plan Amendments

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We will review it as the cleanup progresses and amend it as necessary. You may suggest amendments to Angela Fritz at 360-280-4325 or [angela.fritz@ecy.wa.gov](mailto:angela.fritz@ecy.wa.gov).

This plan includes information for the public regarding opportunities for public involvement and comment. The outreach activities discussed in this section reflect Ecology's current plans for keeping the public informed and providing ways for those interested in the site to communicate their concerns and questions to us.

If you feel the planned outreach activities and mechanisms described in this plan are insufficient, or should otherwise be modified, we will work to find solutions. New outreach activities or outreach tools established as a result can be implemented right away, with or without amending this plan.