PUBLIC PARTICIPATION PLAN

USG Puyallup Site

925 River Road E.
Puyallup, Washington

Prepared by
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Toxics Cleanup Program
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INTRODUCTION

The Washington State Department of Ecology (Ecology) has developed this public participation plan to promote meaningful community involvement during the investigation and cleanup of the USG Puyallup site. This plan describes the tools that Ecology uses to inform the public about site activities and identify opportunities for the community involvement.

Ecology negotiated a legal agreement called an Agreed Order (Agreed Order No. DE 5489) with potentially liable person (PLP) USG (formerly U.S. Gypsum Company). The Agreed Order requires USG to:

- Conduct a Remedial Investigation to investigate the nature and extent of contamination at the site.
- Complete a Feasibility Study to look at options and choose a cleanup action.
- Draft a Cleanup Action Plan to clean up the site to meet Model Toxics Control Act (70.105D RCW) standards.

The Remedial Investigation and Feasibility Study report and Cleanup Action Plan will be made available for public review and comment.

LOCATION AND SITE BACKGROUND

The USG Puyallup site is located at 925 River Road East, in Puyallup. It sits next to and on the banks of the Puyallup River. The site is defined by the extent of contamination.

Site Background

Before 1985, USG used the site for disposing of waste from their rock wool manufacturing plant in Tacoma. Rock wool is made from blowing air through molten rock, which produces a mass of fine fibers. These fibers are used as insulation and fire-proofing. The process of making rock wool produces wastes called “bag house dust” and “shot”. Bag house dust is collected by filters inside a facility. Shot is material left over from melting the rock. Both of these wastes contain arsenic, which has contaminated the site.

From 1985-1986, USG voluntarily dug up and removed bag house dust and shot from the site and disposed of it at a hazardous waste landfill. Ecology required USG to monitor the groundwater after the cleanup. All groundwater monitoring reports have shown arsenic concentrations in exceedence of site cleanup standards.

In 2007, Ecology received a report from USG that showed arsenic contamination of soil and groundwater. USG is now a PLP for the cleanup of the site.

Description of Contamination

A 2007 report states that fifteen soil borings and fifteen groundwater samples were taken from the site. The highest soil arsenic concentration was 2,100 milligrams per kilogram (mg/kg). The highest groundwater arsenic concentration was 18,000 micrograms per liter (ug/l). All samples

taken exceeded the state cleanup levels for soil (20 mg/kg) and groundwater (5 µg/l). Arsenic is likely being released into the Puyallup River and may threaten both human health and the environment.

Cleanup Activities

Cleanup activities at the USG Puyallup site fall under Washington's Model Toxics Control Act (MTCA) and accompanying regulations (Revised Code of Washington (RCW) 70.105D *et seq* and Washington Administrative Code (WAC) 173-340). MTCA has procedures for the cleanup of contaminated sites to standards that are safe for both human health and the environment. Ecology is responsible for implementing and enforcing MTCA.

USG is required to complete a Remedial Investigation (RI), Feasibility Study (FS), and draft Cleanup Action Plan (CAP). The RI report describes the nature and extent of contamination on the site and the FS examines possible cleanup options. The draft CAP selects a cleanup action. The final CAP will be an Ecology document.

For more information about MTCA and the cleanup process, please visit Ecology's Web site at http://www.ecy.wa.gov/biblio/ftc94129.html.

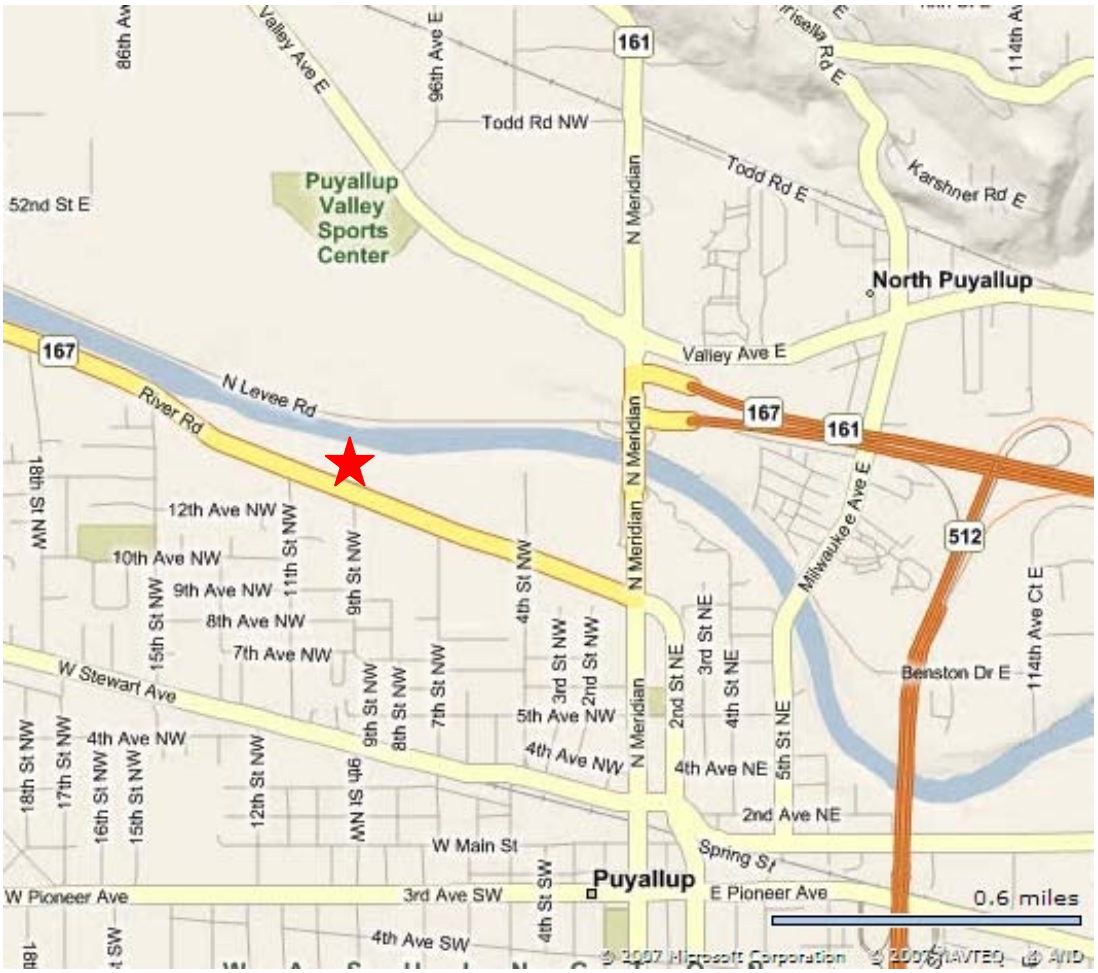

Figure 1.
USG Puyallup Site Map
925 River Road E., Puyallup, WA

Figure 2.
USG Puyallup Site Aerial Photo
925 River Road E., Puyallup, WA

SITE CLEANUP PROCESS

The Model Toxics Control Act (MTCA) requires that each cleanup site follow certain steps to investigate the type and extent of pollution, and plan the cleanup. Figure 2 shows each step in the process.

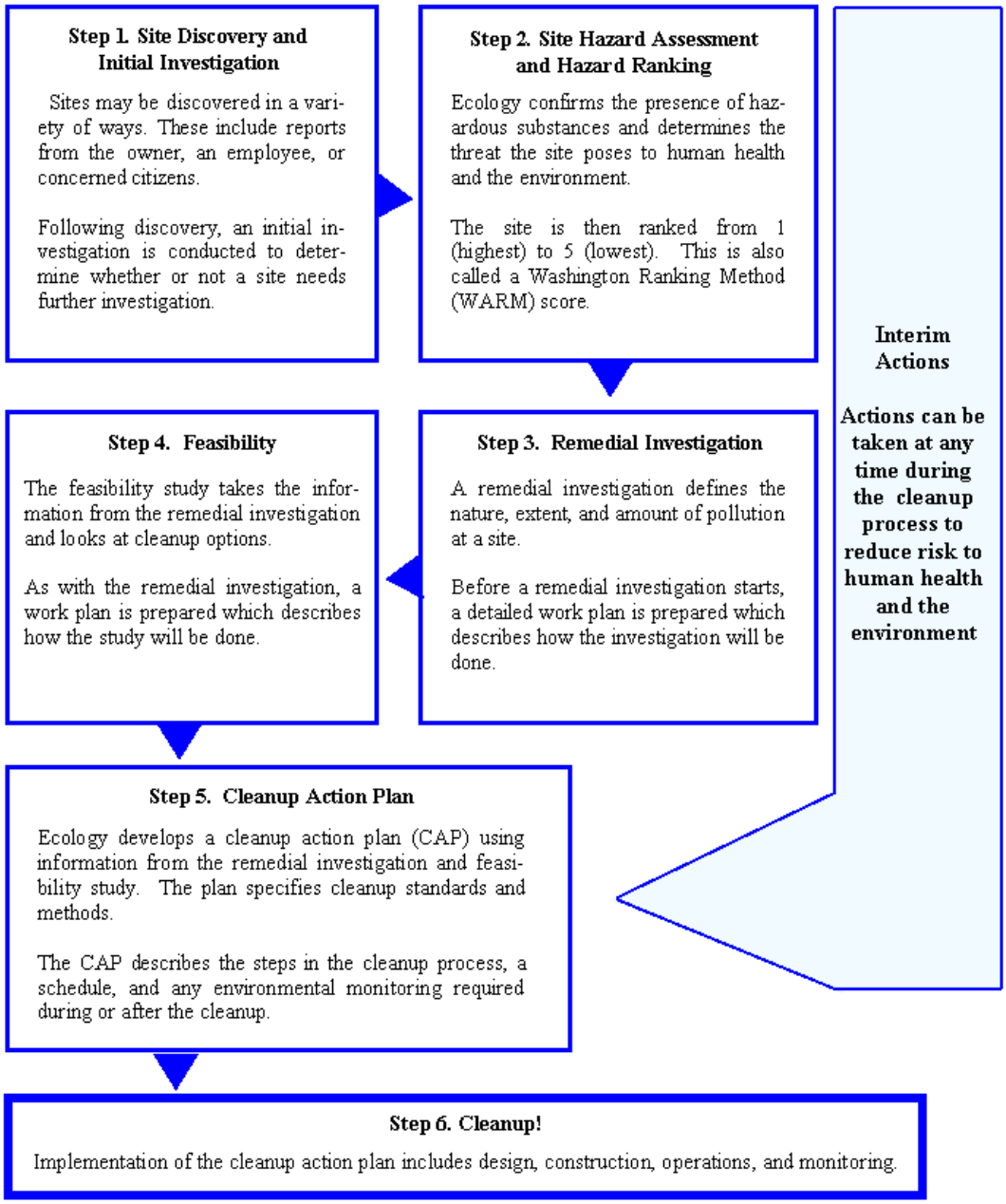

Figure 3. Steps in the Cleanup Process

PUBLIC PARTICIPATION ACTIVITIES AND RESPONSIBILITIES

The purpose of this Public Participation Plan is to promote public understanding and participation in the MTCA activities planned for this site. This section of the plan addresses how Ecology will share information and receive public comments and community input on the site activities.

Ecology uses a variety of activities to increase public participation in the investigation and cleanup of MTCA sites. Ecology will use input provided by the community whenever possible.

The following is a list of the public involvement activities that Ecology will use, their purposes, and descriptions of when and how they will be used during cleanup of the USG Puyallup site.

Formal Public Comment Periods

Comment periods are the primary way Ecology gets feedback from the public on proposed cleanup decisions. Comment periods usually last 30 days and are required at key points during the investigation and cleanup process before final decisions are made.

During a comment period, the public can comment in writing. Verbal comments are taken if a public hearing is held. After formal comment periods, Ecology reviews all comments received and may respond in a document called a Responsiveness Summary.

Ecology will consider the need for changes or revisions based on input from the public. If significant changes are made, then a second comment period may be held. If no significant changes are made, then the draft document(s) will be finalized.

Additional public comment periods will be held for:

- The draft Remedial Investigation and Feasibility Study report and draft Cleanup Action Plan.
- Any interim actions (partial cleanup actions).
- Any future legal agreements regarding this site.

Public Meetings and Hearings

Public meetings may be held at key points during the investigation and cleanup process. Ecology also may offer public meetings for actions expected to be of particular interest to the community. These meetings will be held at locations convenient to the community. A public meeting will also be scheduled if ten or more people request one.

Information Repositories

Information repositories are places where the public may read and review site information, including documents that are the subject of public comment.

Ecology has established two repositories for the USG Puyallup cleanup:

- Puyallup Public Library – 324 S. Meridian, Puyallup, WA 98371. (253) 841-5454.
- Citizens for a Healthy Bay – 917 Pacific Avenue Suite 100, Tacoma, WA 98402. (253) 383-2429.
- Washington State Department of Ecology, 300 Desmond Drive, Lacey, WA 98516. Please call (360) 407-6045 for an appointment.

Site information also will be posted on Ecology's Web site at http://www.ecy.wa.gov/programs/tcp/sites/USG_Interiors/usg_interiors_hp.htm.

Site Register
Ecology's Toxics Cleanup Program uses its bimonthly Site Register to announce all of its public meetings and comment periods, as well as many other activities. To receive the Site Register in electronic or hard copy format, contact Linda Thompson at (360) 407-6069 or by e-mail at Ltho461@ecy.wa.gov.

It is also available on Ecology's web site at http://www.ecy.wa.gov/programs/tcp/pub_inv/pub_inv2.html.

Mailing List
Ecology has compiled a mailing list for the site. It includes individuals, groups, public agencies, elected officials, private businesses, and other known interested parties. The list will be maintained at Ecology's Southwest Regional Office and will be updated as needed.

Please contact Hannah Aoyagi at (360) 407-6790 or by e-mail at haoy461@ecy.wa.gov if you would like to be involved or have your address added to or deleted from this mailing list.

Fact Sheets
Ecology will mail fact sheets to persons and organizations interested in the USG Puyallup site cleanup to inform them of public meetings and comment opportunities and important site activities. Ecology also may mail fact sheets about the progress of site activities.

Newspaper Display Ads
Ecology will place ads in the Tacoma News Tribune to announce public comment periods and public meetings or hearings for the site.

Plan Update
This public participation plan may be updated as the project proceeds. If an update is necessary, the revised plan will be submitted to the public for comment.

Contacts
If you have questions or need more information about this plan or the USG Puyallup cleanup, please contact:

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GLOSSARY

Agreed Order: A legal agreement between Ecology and a potentially liable person to conduct work toward a cleanup.

Cleanup: Actions taken to deal with a release, or threatened release of hazardous substances that could affect public health or the environment. The term "cleanup" is often used broadly to describe various response actions or phases of remedial responses such as the Remedial Investigation/Feasibility Study.

Cleanup Action Plan (CAP): A document that explains which cleanup alternative(s) will be used at sites for the cleanup. The Cleanup Action Plan is based on information and technical analysis generated during the Remedial Investigation/Feasibility Study and consideration of public comments and community concerns.

Comment Period: A time period during which the public can review and comment on various documents and proposed actions. For example, a comment period may be provided to allow community members to review and comment on proposed cleanup action alternatives and proposed plans.

Contaminant: Any hazardous substance that does not occur naturally or occurs at greater than natural background levels

Feasibility Study: This study develops and evaluates cleanup options for a given site.

Groundwater: Water found beneath the earth's surface that fills pores between materials such as sand, soil, or gravel. In some aquifers, ground water occurs in sufficient quantities that it can be used for drinking water, irrigation and other purposes.

Information Repository: A file containing current information, technical reports, and reference documents available for public review. The information repository is usually located in a public building that is convenient for local residents such as a public school, city hall, or library.

Model Toxics Control Act (MTCA): Legislation passed by citizens of the State of Washington through an initiative in 1988. Its purpose is to identify, investigate, and clean up facilities where hazardous substances have been released. It defines the role of Ecology and encourages public involvement in the decision making process. MTCA regulations are administered by the Washington State Department of Ecology.

Potentially Liable Person: Any individual(s) or company(s) potentially responsible for, or contributing to, the contamination problems at a site. Whenever possible, Ecology requires these PLPs, through administrative and legal actions, to clean up sites.

Public Notice: At a minimum, adequate notice mailed to all persons who have made a timely request of Ecology and to persons residing in the potentially affected vicinity of the proposed action; mailed to appropriate news media; published in the local (city and county) newspaper of largest circulation; and the opportunity for the interested persons to comment.

Public Participation Plan: A plan prepared to encourage coordinated and effective public involvement designed to the public's needs at a particular site.

Remedial Investigation: This study characterizes the site and defines the extent of contamination.

Remedial Investigation/Feasibility Study: Two distinct but related studies. They are usually performed at the same time, and together referred to as the "RI/FS." They are intended to:

-Gather the data necessary to determine the type and extent of contamination;
-Establish criteria for cleaning up the site;
-Identify and screen cleanup alternatives for Remedial action; and
-Analyze in detail the technology and costs of the alternatives.

Responsiveness Summary: A summary of oral and/or written public comments received by Ecology during a comment period on key documents, and Ecology's responses to those comments. The responsiveness summary is especially valuable during the Cleanup Action Plan phase at a site when it highlights community concerns.

Risk: The probability that a hazardous substance, when released into the environment, will cause an adverse effect in the exposed humans or living organisms.

Site: Any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, vessel, or aircraft; or any site or area where a hazardous substance, other than a consumer product in consumer use, has been deposited, stored, disposed of, or placed, or otherwise come to be located.

Toxicity: The degree to which a substance at a particular concentration is capable of causing harm to living organisms, including people, plants and animals.