



Public Participation Plan: U.S. Navy Keyport

**Naval Undersea Warfare Center,
Division Keyport
610 Dowell Street
Keyport, Washington 98345**

ID Number: WA1170023419

Hazardous Waste and Toxics Reduction Program

Washington State Department of Ecology
Northwest Region Office
Shoreline, Washington

April 2024 | Publication 24-04-012

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Cover Photo

Photo of Naval Base Kitsap – Keyport, courtesy of the U.S. Navy.

Related Information

- Facility site ID: 158
- Cleanup site ID: 128

Contact Information

Washington State Department of Ecology

Hazardous Waste and Toxics Reduction Program
Northwest Region Office
P.O. Box 330316
Shoreline, WA 98133

Website: [Washington State Department of Ecology](http://www.ecology.wa.gov)¹

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ADA Accessibility

The Department of Ecology is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Sections 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact Ecology by phone at 360-407-6700 or email at hwtrpubs@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit [Ecology's website](http://www.ecology.wa.gov)² for more information.

¹ www.ecology.wa.gov/contact

² www.ecology.wa.gov/accessibility

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DEPARTMENT OF
ECOLOGY
State of Washington

Department of Ecology's Region Offices

Map of Counties Served



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

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Public Involvement in Hazardous Waste Permitting

Washington State Department of Ecology (Ecology, we) developed this public participation plan (PPP) in cooperation with the United State Navy, Naval Base Kitsap, for the Naval Undersea Warfare Center, Division Keyport (NUWC Keyport).

The PPP describes how we involve the public in the issuance of a dangerous waste treatment, storage, and disposal (TSD) permit.

We encourage the public to:

- Learn about and get involved in decision-making opportunities.
- Provide input about permit conditions.

Public participation activities are coordinated between the liable parties and Ecology. We must make sure the outreach complies with Washington State's dangerous waste regulations and the federal Resource Conservation and Recovery Act (RCRA) requirements. We will hold a public comment period before the permit is finalized.

To be included in the site record, your comments about the permit must be submitted during comment periods. Questions and informal comments or information about the site are welcome anytime.

Contacts

Ecology contacts:

Washington State Department of Ecology
Northwest Region Office
P.O. Box 330316
Shoreline, WA 98133

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Division Keyport

Kenneth Eiford

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NUWC Keyport Code 1023

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Phone: 360-315-8571

Public Participation Grants

Grants may be available to neighborhood committees, nonprofits, and others. These funds can be used to:

- Hire an expert to help interpret technical information.³
- Conduct activities to increase understanding and participation in the cleanup process.

For more information about public participation grants, please contact:

Laura Busby

Grant Manager

Phone: 360-280-5088

Email: laura.busby@ecy.wa.gov

Jill Krumlauf

Grant Manager

Phone: 360-790-5771

Email: jill.krumlauf@ecy.wa.gov

You may also visit our [Public Participation Grant webpage](#).⁴

³ Ecology currently does not have a citizen technical advisor for providing technical assistance to citizens on issues related to the investigation and cleanup of the site.

⁴ www.ecology.wa.gov/ppgrants

Interaction Between State and Federal Laws

In Washington State, we use the Model Toxics Control Act (MTCA) and other regulations to clean up properties that were permitted under the federal Resource Conservation and Recovery Act (RCRA) to treat, store, or dispose of hazardous wastes. These cleanups, called “corrective actions,” are required by RCRA. The U.S. Environmental Protection Agency (EPA) sets and enforces environmental standards in the United States. EPA allows Ecology to use MTCA, not RCRA, for cleanups at permitted treatment, storage, and disposal facilities (TSDs) in Washington State.

This PPP is required under MTCA. MTCA sets standards to ensure contaminated site cleanups in our state protect human health and the environment.

Federal RCRA and state dangerous waste regulations require opportunities for public participation during key stages of facility permitting and cleanup.

Model Toxics Control Act

MTCA was a grassroots citizens’ initiative in 1988, and we started using it to clean up contaminated sites in Washington in 1989. Under MTCA, a current or past property owner or operator must clean up contamination on or coming from their property, until levels are safe for human health and the environment.

Public participation is an important part of the MTCA process. Participation needs are determined for each site by the level of public interest and the risk posed by the contamination. People who live near the site, community groups, businesses, government entities, and any interested parties can comment on the process.

Resource Conservation and Recovery Act

There are federal and state rules controlling hazardous wastes. Congress passed RCRA in 1976 to ensure safe management and disposal of hazardous waste. RCRA was updated several times to expand its scope and requirements.

RCRA’s goals are to:

- Protect human health and the environment.
- Reduce waste and conserve energy and natural resources.
- Reduce or stop hazardous waste generation.

Permits

As a RCRA requirement, TSD facilities must have a **permit** to design, operate, maintain, or close their site. TSDs manage hazardous wastes by treating, storing, or disposing of them using pre-

approved methods. TSDs may offer specialized waste services to businesses, or they may manage their own wastes exclusively. TSD facilities are also called hazardous waste management facilities. RCRA also requires TSDs to clean up contamination from past and present practices.

Operations

Operations performed by TSD facilities include the following:

- **Treatment:** Hazardous wastes are treated using chemicals, incineration, oxidation, or a physical process to reduce, remove, or destroy the hazard in that waste.
- **Storage:** Hazardous wastes produced on or off-site are securely held until they are treated or disposed of. RCRA regulations require that hazardous waste storage must be done in containers, tanks, containment buildings, drip pads, waste piles, or surface impoundments.
- **Disposal:** These facilities permanently hold hazardous waste in specifically designed and constructed landfills that safeguard groundwater and surface water resources.

State Environmental Policy Act

Ecology and the potentially liable party (PLP) follow the State Environmental Policy Act (SEPA) during review and development of permits. Ecology uses SEPA to find and evaluate negative environmental impacts that could result from a proposed action.

Site Information

Background and Land Use

NUWC Keyport is part of Naval Base Kitsap. At NUWC Keyport, the U.S. Navy tests, evaluates, and refurbishes undersea warfare systems and their components. The base generates dangerous waste from those activities. Within 90-days, accumulated dangerous waste must be moved to the permitted on-site dangerous waste storage facility (the “TSD facility” or “facility”). AT NUWC Keyport, this facility is in a single building called “building 1051.” Some waste treatment also occurs in this permitted building.

By following permit requirements, the Navy can store wastes there for up to one year. The facility can also accept waste from other military bases if they follow the permit conditions. The Navy stores dangerous wastes in the permitted building until they send them off site for treatment and recycling or disposal. Dangerous waste management that requires a permit is done only in this building. The facility does not incinerate or dispose of any dangerous wastes on the base.



Figure 1. The location of the dangerous waste storage facility (building 1051) at NUWC Keyport.

Previously, the Navy had a different facility at NUWC Keyport, permitted under “interim status” since November 1980. In 1990, we determined that the location was not suitable for a permanent facility. It was over an old landfill that needed to be cleaned up. In 1994, the Navy built a new building strictly for dangerous waste management. In 2007, the facility was permitted by Ecology to operate as a TSD facility.

This permit allows the Navy to keep operating the TSD facility in building 1051. They will continue to accept and store the same types of wastes as they have been for years. The permit allows them to store 130,180 gallons of wastes. Storage includes 85,180 gallons in containers and 45,000 gallons in tanks.

When the facility has accumulated enough waste to make shipment economical, the waste will be sent off site to a permitted TSD for proper treatment and recycling or disposal.

Wastes Managed

The permitted facility accepts and manages a wide range of wastes, including:

- Flammable and combustible wastes (fuel wastes).
- Corrosive wastes (acids or bases; non-neutral pH).
- Reactive wastes (physical shock or exposure to water or air can explode reactive wastes).
- Toxic wastes (poisonous).
- Oily wastes.
- Polychlorinated biphenyl (PCB) wastes (may cause cancer).
- Industrial waste waters.
- Solids and sludges.
- Contaminated debris/universal waste (alkaline batteries, florescent lamps for recycling).

Protective Permit Conditions

We reviewed the permit application to make sure that all areas used for waste management met design standards for dangerous waste facilities. The permit has detailed conditions on how the areas are used, inspected, and maintained.

The permitted facility accepts wastes at a single receiving area that has coated concrete secondary containment. The facility sorts waste to make sure that wastes that could react with each other are kept separate. Facility personnel move the waste containers to the long-term storage area within two working days.

The facility also receives bulk shipments of wastes in the receiving area. There are nine dangerous waste tanks used to store these wastes. Before adding bulk waste to a tank, they must verify that the waste is compatible with waste already in that tank. This is to avoid dangerous reactions.

In addition to waste storage, NUWC Keyport can use their tanks to treat wastewater that is dangerous waste. They must ensure the treated wastewater meets standards in their wastewater permit before sending it for additional treatment and discharge at the Central Kitsap Wastewater Treatment Plant in Brownsville.

The facility has a shipping area used to prepare for off-base shipment of containerized waste.

Contamination

The NUWC Keyport dangerous waste management facility is located in a single building (often called “building 1051” or “the TSD”). The area of the building is approximately 68,500 square feet. Operating requirements in the draft permit apply only to that facility.

The NUWC Keyport base occupies 343 acres, and that entire area is subject to dangerous waste “corrective action.” Corrective action means environmental cleanup of contamination. Because of existing environmental contamination on the base, EPA designated the NUWC Keyport base a superfund site in 1989. The federal Superfund Program and MTCA Cleanup Program have been working with to the Navy since 1989 to clean up the base. Ecology decided not to include that work in the draft permit because separate agreements control those actions.

Environmental Justice and Title VI

Environmental justice (EJ) promotes fair treatment of all people under environmental laws and policies, regardless of their race, color, national origin, or income.

In Washington (and across the United States), more people of color and/or low-income people live and work near industrial facilities, contaminated sites, and in neighborhoods without easy access to fresh food, green spaces, or clean air and water. These conditions negatively and unfairly affect their health and safety.

EJ strategies and compliance with Title VI of the Civil Rights Act are key to addressing these inequities—especially through public involvement. We make every effort to inform and involve all people. To do this, we use demographic information to design our messaging to fit the community.

Demographics

Below are the demographic indicators for the area around NUWC Keyport, including the people of color, low-income populations, and people who speak languages other than English.⁵ The [EPA’s Environmental Justice Screening and Mapping Tool](#) (EJSCREEN)⁶ for within 3.14 square miles around NUWC Keyport showed no socioeconomic indicators above the state’s 80th percentile.

Table 1. Study of the people living within 3.14 square miles around the site (population 1,727).

Socioeconomic Indicators	Value	State Average	Percentile in State
Demographic index	14%	28%	18
Supplemental demographic index	7%	12%	24
People of color population	16%	32%	25
Low-income population	13%	24%	31
Unemployment rate	4%	5%	54
Limited English speaking	1%	4%	53
Population with less than high school education	2%	8%	23
Population under 5 years of age	7%	6%	66
Population over 64 years of age	23%	16%	77
Low life expectancy	17%	18%	41

Languages spoken at home

According to EJSCREEN, there are no non-English languages spoken at home near the site.

English language proficiency

According to EJSCREEN census data, the households that speak English “less than very well” make up zero percent of the area population.

⁵ <https://ejscreen.epa.gov/mapper/>

⁶ <https://ejscreen.epa.gov/mapper/>

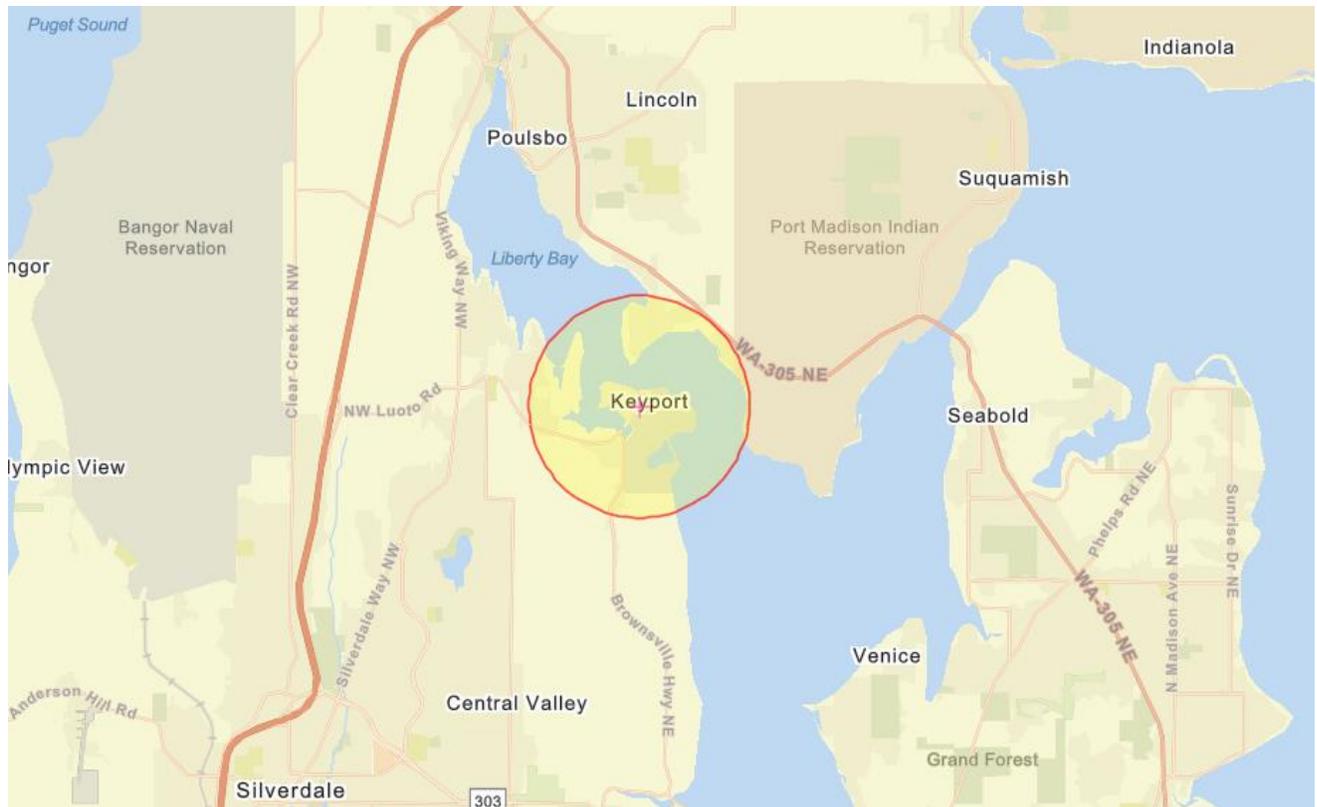


Figure 2: Environmental justice (EJ) demographic screening boundaries around NUWC Keyport, from EPA's EJSCREEN mapping tool.⁷

Outreach activities and language access

Based on this analysis, we will conduct the following outreach activities for this site:

- Provide information about requesting language services in all public materials.
- Translate all documents that are vital or critical to well-being for language groups that are either 5% of the population or more than 1,000 people.

To request translation services, please contact:

Janelle Anderson, Community Outreach & Environmental Education Specialist

Washington State Department of Ecology

Northwest Region Office

P.O. Box 330316

Shoreline, WA 98133

Phone: 425-301-6454

Email: Janelle.anderson@ecy.wa.gov

⁷ <https://ejscreen.epa.gov/mapper/>

Ecology will contact cultural community organizations as part of our outreach and provide information in other languages following federal guidance.⁸ When appropriate, we will provide outreach materials in these languages. We strive to make our public participation efforts as inclusive as possible and welcome your input about how to reach the nearby community.

Tribal involvement

Ecology will invite the federally recognized Suquamish Tribe and Port Gamble S'Klallam Tribe to engage in decision-making during the process on a government-to-government basis.

⁸ 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).

Public Participation Activities

You are invited to review the draft permit before it becomes final. This is the most direct way to learn more about the site and be involved in decision-making.

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

However, to be included in the formal site record, comments about the dangerous waste permit must be submitted during formal comment periods.

How We Share Information with the Community

For this permit renewal, we will mail notices about public comment periods to addresses around the site. The mailing list area varies, but it will at least include addresses within a quarter-mile radius of the site and other interested organizations and individuals. These notices provide:

- General information about the site.
- Contact information for submitting comments.
- Times and locations of public meetings or hearings.
- How to request a meeting if one is not yet scheduled.

Ecology may also develop documents outside of comment periods to keep the community updated about the site. 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 extra costs.

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

Postal mailing list

Ecology maintains a mailing list that includes addresses near the site. This mailing list also includes local, state, Tribal, and federal government contacts.

Everyone will receive public comment notices when draft documents are available.

We'll 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 Janelle Anderson at 425-301-6454 or janelle.anderson@ecy.wa.gov.

Site Register

Public comment periods, events, and other notices are published in Ecology's [Site Register](#).⁹ To receive the Site Register by email, please [subscribe online](#),¹⁰ or contact Sarah Kellington at sarah.kellington@ecy.wa.gov or 360-280-3167.

Newspaper display ads or legal notices

We will announce public comment periods and events for this site in ads or notices published in the [Kitsap Sun](#).¹¹

Ecology's website and social media platforms

We have a website for [NUWC Keyport](#)¹² with more information and related documents. Information may also be shared about cleanup sites through social media sites, [news releases](#),¹³ and [Ecology's blog](#).¹⁴

Document repositories

You may review documents in person at this location by appointment:

Washington State Department of Ecology
Northwest Region Office
15700 Dayton Ave N.
Shoreline, WA 98133-9716
Reception (24-hour): 206-594-0000

Signs around the cleanup site

We may also display signs with information about project status, traffic impacts, and health risks around the cleanup Site.

How to Share Information with Us

You may ask questions, submit informal comments, or share site information with us at any time. Please contact Erika Lindsey at 564-999-3224 or erika.lindsey@ecy.wa.gov.

To be included in the formal site record, comments must be submitted during formal public comment periods. We may hold comment periods longer than 30 days.

⁹ ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data

¹⁰ public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_118

¹¹ www.kitsapsun.com/

¹² apps.ecology.wa.gov/cleanupsearch/site/128#site-documents

¹³ ecology.wa.gov/About-us/Get-to-know-us/News

¹⁴ ecology.wa.gov/blog

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 Erika Lindsey at 564-999-3224 or erika.lindsey@ecy.wa.gov.

Public comment periods

Formal comment periods allow members of the public to comment on draft documents and proposed actions. If there is enough interest, we may extend the public comment period.

Following a comment period, we publish all the input we received and respond to comments and questions. If the comments result in significant changes, then the documents will be revised and re-issued for public review. If the comments don't result in significant changes, they become final.

Public events

We hold public meetings, workshops, open houses, and public hearings based on community interest. If we haven't scheduled a meeting, we will hold one if 10 people request it. We may also extend the public comment period so the meeting occurs during it.

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

Americans with Disabilities Act

The Department of Ecology is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Sections 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact the Ecology by phone at 360-407-6700 or email at hwtrpubs@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit [Ecology's ADA website](#)¹⁵ for more information.

¹⁵ ecology.wa.gov/accessibility

Plan Amendments

Ecology developed this PPP following MTCA regulations (WAC 173-340-600). We review it periodically and amend it as necessary. You may suggest changes to Janelle Anderson by phone at 425-301-6454 or email janelle.anderson@ecy.wa.gov.

This PPP includes information for the public regarding opportunities for public involvement and comment. The planned outreach activities will keep the public informed and provide ways for people to communicate their concerns and questions.

If you feel the planned outreach activities are insufficient or need changes, we welcome your feedback. Different outreach activities or outreach tools can be used right away, with or without updating this plan.

Abbreviations and Acronyms

ADA

Americans with Disabilities Act

AO

Agreed Order

CAP

Cleanup Action Plan

Cleanup

Actions taken to protect public health and the environment from the effects of environmental contamination.

Ecology

Washington State Department of Ecology

EJ

Environmental justice

EJScreen

EPA's Environmental Justice Screening and Mapping Tool

EPA

U.S. Environmental Protection Agency

FS

Feasibility Study

MTCA

Model Toxics Control Act

NUWC Keyport

Naval Undersea Warfare Center, Division Keyport (part of Naval Base Kitsap)

PLP

Potentially liable party

PPP, Plan

Public participation plan

RCRA

Resource Conservation and Recovery Act

RI

Remedial Investigation

SEPA

State Environmental Policy Act

Site

Area where hazardous substances are located.

TSD

Treatment, storage, and disposal facility

WAC

Washington Administrative Code