PUBLIC PARTICIPATION PLAN

JORGENSEN FORGE SITE

SEATTLE, WASHINGTON

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Introduction

The Washington State Department of Ecology (Ecology) prepared this Public Participation Plan (Plan) according to the Model Toxics Control Act (MTCA). This plan is designed to promote meaningful community involvement during Source Control Investigations at the Jorgensen Forge property located at 8531 E. Marginal Way South in Seattle, Washington. This plan outlines and describes the tools Ecology will use to inform the public about site activities, and it identifies opportunities for the community to become involved in this process.

Ecology and Jorgensen Forge Corporation have negotiated a legal agreement called an Agreed Order to conduct a Source Control Investigation at the site. The purpose of the Source Control Investigation is to determine whether the site is an on-going source of contamination to sediments in the Lower Duwamish Waterway that could cause a violation of sediment cleanup goals. The results of the Source Control Investigation will be used to evaluate, and select effective measures to prevent or control sources of contamination, if any, migrating from the site to the Lower Duwamish Waterway.

If any source control measures are necessary to prevent recontamination of Lower Duwamish Waterway sediments, they will be implemented under a separate legal agreement.

Location and Site Background

The Jorgensen Forge site is located along the east Bank of the Lower Duwamish Waterway at 8531 East Marginal Way South in Seattle, Washington. It is bordered to the north by Boeing Plant 2, the east by East Marginal Way South, and to the south by Boeing Isaacson property (See figure on page 6).

Site Background

The Jorgensen Forge site consists of approximately 21.6 acres. It is located in an industrial area. Jorgensen Forge manufactures specialized open die steel forgings and rolled aluminum rings. In addition to steel and aluminum, Jorgensen also processes nickel, titanium, and specialized alloys.

The site was developed in 1942, and operated from 1942 to 1965 as a fabricator of structural steel, tractor and road equipment. Operations on the site included forging and heat-treating by Isaacson Iron Works, which operated as a U.S. naval vessel manufacturer.

Bethlehem Steel operated a steel distribution center on the northwestern portion of the site from approximately 1951 to 1963. Bethlehem Steel operations consisted of cutting prefabricated steel rods to customers' specifications. From 1965 to 1992, the site was owned and operated by Earle M. Jorgensen Company (EMJ).
In July 1992, the facility was purchased by the plant management group and became the Jorgensen Forge Corporation. From 1992 to the present, the site has been owned and operated by Jorgensen.

Contaminants of Concern

Previous investigations at the site have detected concentrations of polychlorinated biphenyls (PCBs), total petroleum hydrocarbons (TPH) and arsenic, cadmium, chromium, lead and nickel in soil exceeding the applicable cleanup levels in various areas of the site. Concentrations of TPH and metals have also been detected in groundwater at the site exceeding the applicable cleanup levels. Concentrations of TPH in groundwater that exceed the cleanup levels were detected on the eastern half of the site. Concentrations of halogenated volatile organic compounds (HVOCs), primarily vinyl chloride, that exceed the applicable cleanup levels have been detected in groundwater on the northwestern portion of the site. The concentrations of HVOCs detected in groundwater at the site may be attributable to off-site sources.

Contamination at the Jorgensen Forge site appears to be associated with heavy industrial activities conducted on this site since the 1940's, and contaminated groundwater migrating onto the property from off-site sources. Hydraulically placed fill was used to fill a former embayment located on the western portion of the site. As a result, portions of the site contain the following hazardous substances:

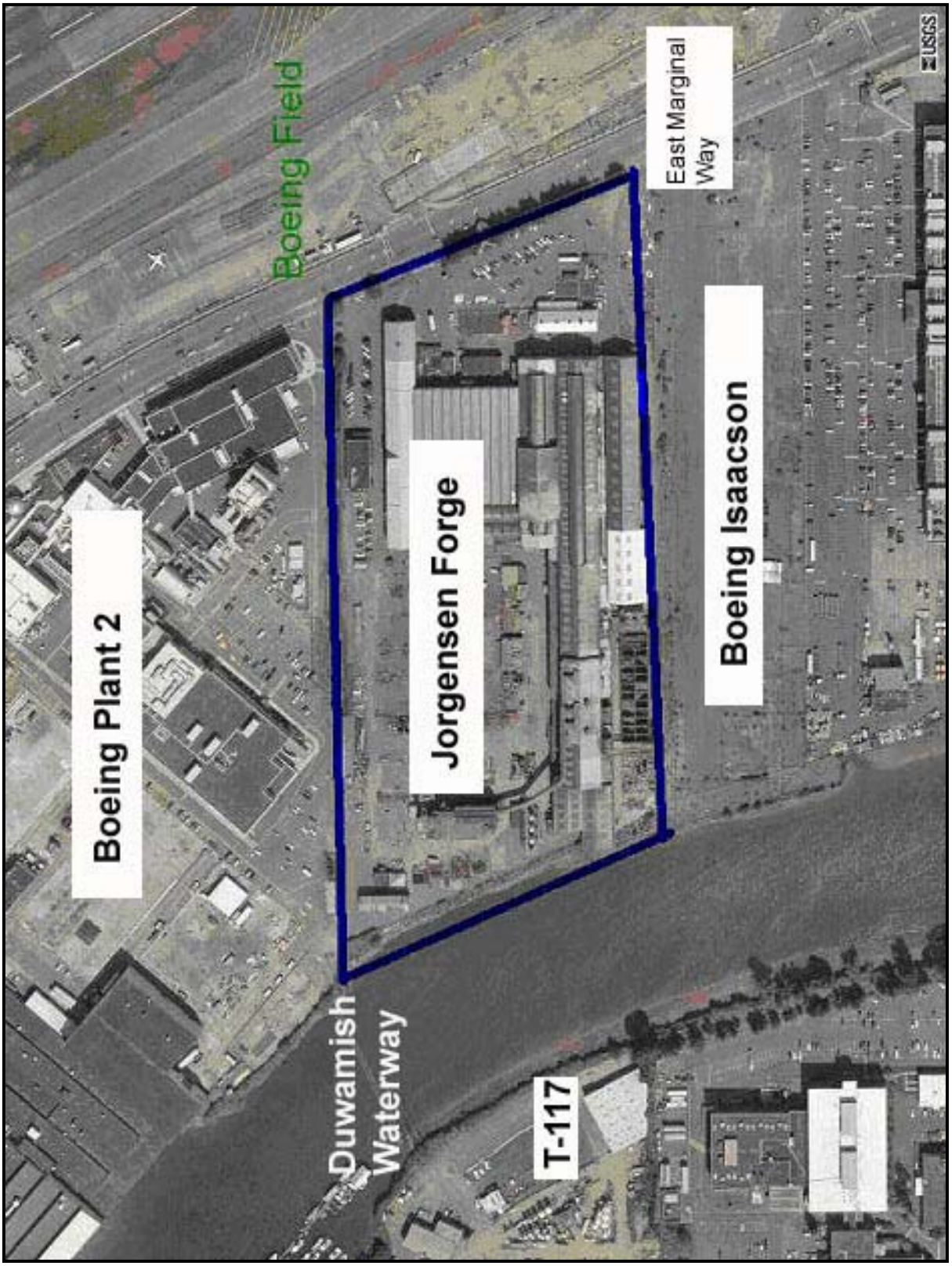
- polychlorinated biphenyls (PCBs)
- total petroleum hydrocarbons (TPH)
- halogenated volatile organic compounds (VOCs)

Current Activity

The proposed actions to be conducted under the Agreed Order include the following:

- Review the existing data.
- Identify data gaps.
- Obtain additional data if necessary.
- Analyze potential pathways of ongoing contamination to the Lower Duwamish Waterway sediments.
- Document the status of source control on site.

Picture showing Jorgensen Forge site - Looking East towards Jorgensen



Site Map: Jorgensen Forge Site

Community Profile

For decades much of the land adjacent to the Lower Duwamish Waterway has been industrialized. Current commercial and industrial operations include cargo handling and storage, marine construction, boat manufacturing, marina operations, concrete manufacturing, paper and metals fabrication, food processing, metal forging and airplane parts manufacturing.

Although the Lower Duwamish Waterway is viewed primarily as an industrial corridor, two residential neighborhoods border the banks of the river: South Park and Georgetown. The South Park neighborhood is located on the western shore of the Lower Duwamish Waterway, and the Georgetown neighborhood is located on the eastern shore of the Duwamish Waterway. Both neighborhoods are located downstream of the site. The residents of the community are well known for their commitment to neighborhood issues particularly related to the ongoing site cleanups along the Lower Duwamish Waterway. A description of these communities is provided below.

South Park Community Description

The South Park neighborhood is located in South Seattle, on the west bank of the Duwamish River. The first residents of South Park were Native Americans of the Duwamish tribe who lived on the shores of the Duwamish River for thousands of years. This neighborhood was once a small farming town composed of Italian and Japanese farmers who supplied fresh produce to Seattle's Pike Place Market. South Park became part of the city of Seattle in 1907.

By 1920 the Duwamish River was straightened out into a straight, deep channel that would accept ocean-going ships and barges. This change in the Duwamish greatly impacted the South Park neighborhood. The lazy meanders had been straightened, which made it easier for Industry to develop along the banks of the waterway.

In the mid 1960s, South Park was rezoned as industrial. Over 4,000 residents protested and the zoning was changed to low-density residential.

The City of Seattle built the South Park community center in 1989. This remains a vital resource within the community.

Records from 2005 show that South Park is comprised of approximately 3,717 people (37% Hispanic, 34% white, 14% Asian, 7 % Black, 5%multiracial, 2% American Indian, 1% Native Hawaiian/Pacific Islander). The average age is 31 years old and the average income in this neighborhood is $20,917.

Georgetown Community Description

The Georgetown neighborhood is located in South Seattle, on the east bank of the Duwamish River across the river from South Park. Georgetown is Seattle's oldest neighborhood, settled by Luther Collins in 1851. It was incorporated as the City of Georgetown from 1904-1910.

According to records from 2005, just over 1,100 people live in Georgetown. The largest local employers in Georgetown are in the arts, entertainment, and recreation industries. The Georgetown community council is very active.

The Duwamish River Cleanup Coalition

The Duwamish River Cleanup Coalition (DRCC) is an advisory group that works with the South Park and Georgetown neighborhoods to ensure a Duwamish River cleanup that is accepted by and benefits the community and is protective of fish, wildlife and human health.

DRCC was formed by an alliance of community, environmental and small business groups affected by ongoing pollution and cleanup plans for the Duwamish River. The coalition members include: Community Coalition for Environmental Justice, The Duwamish Tribe, The Green-Duwamish Watershed Alliance, The Environmental Coalition of South Seattle, Georgetown Community Council, People for Puget Sound, Puget Soundkeeper Alliance, Washington Toxics Coalition, and Waste Action Project.
DRCC is a formal "community advisory group" recognized by EPA and representing the interests of the community. They receive funding to hire a Technical Advisor to review all cleanup related studies and plans. They are involved in all aspects of the proposed cleanup and are working with Ecology to ensure that the cleanup meets community standards.

Key Community Concerns and Issues

Ecology and EPA conducted interviews with community members, environmental organizations, and community organizations in October 2002 for the Lower Duwamish Waterway Site Community Involvement Plan. The Jorgensen site is located within the larger Lower Duwamish Waterway Site. Ecology conducted an abbreviated version community interviews in 2006 and determined that the concerns raised in 2002 were still pertinent.

There is clear interest in this cleanup process. The following is representative of significant concerns and issues expressed during the community interviews. Ecology will work to respond to community concerns throughout the cleanup process and through coordination with EPA, other organizations, such as state and local health agencies, and the community advisory group that has been established for the site.

- **Health:** One person interviewed was confident that health risks will be addressed, but others are concerned that living close to the Duwamish Waterway could affect their health. People expressed concern about consumption of all bottom fish and parts of other fish, as well as contamination from chemicals, bacteria and viruses. There is concern about exposure to contaminated sediments through contact at public access parks, employment at industries on the waterway, restoration work, and other cleanup work. Some said that there should be limited access to the river if there is a health risk.

- **Wildlife:** Not everyone interviewed believes that wildlife is being affected by contamination, but most expressed concern for fish and wildlife. Sea lions, salmon, bottomfish, crabs, mussels, clams, opossums, squirrels, ducks and other birds were mentioned, as well as concern about the disappearance of herons and for herons on Kellogg Island in the Duwamish Waterway.

- **Domestic Animals:** There is concern about dogs eating garbage from the river and horses being on a greenbelt above the river.

- **River and Groundwater Contamination:** There is concern that the river is dying and that it contains contaminants, including PCBs and mercury. There is concern about the effect of septic systems near the river; sewer overflows; surface water runoff, including

oil, antifreeze and fertilizers; unreported spills and illegal dumping; and pumping of waste into the river or groundwater. There is concern that permits for discharges to the river are not being enforced or will be revised to be less strict. There is concern that sources of PCBs are not being addressed.

- **Economics**: Some people interviewed are concerned about contamination lowering property values. Others are concerned that businesses will leave the area due to the designation of the Lower Duwamish Waterway as a Superfund site.

- **Cleanup:** Some people are concerned that South Park and the businesses on the water will be affected by cleanup activities, such as increased truck or barge traffic and potential accidents. There are concerns about the costs of damages to natural resources and the possibility that parties responsible for contamination will do some early cleanup activities but nothing more.

- **Information:** Several people expressed concern about a lack of warning signs for fishermen and recreational users and suggested that such signs should be installed. People are concerned about whether adequate information reaches the Spanish-speaking and other non-English-speaking communities and whether the average person and immigrants understand the risks.
- **Image:** While some people described the Duwamish Waterway neighborhood as an industrial area, others are concerned that it is perceived as a dumping ground.

Additional public concerns may be identified over the course of the cleanup through: public comment periods; further community interviews; surveys; meetings; and other contacts with individuals, community groups, or organizations.

Ecology will work to respond to community concerns through the cleanup process and coordination with other regulatory agencies and property owners as necessary.

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.

Public Involvement Activities

Ecology uses a variety of activities to facilitate public participation in the investigation and cleanup of MTCA sites. Ecology will implement 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 this site source control investigation.

Formal Public Comment Periods

Comment periods are the primary method Ecology uses to get 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 any potential draft Remedial Investigation/Feasibility Studies (RI/FS), for any potential draft cleanup action plans that are developed for the site, and for any future legal agreements regarding this site.

Public Meetings and Hearings

Public meetings may be held at key points during the source control investigation. 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.

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 three repositories for the Jorgensen Forge source control investigation project.

- Washington State Department of Ecology, 3190 160th Avenue SE, Bellevue, WA 98008, (425) 649-7190. Please call for an appointment.
- South Park Library, 8604 Eight Ave S., Cloverdale St. Seattle

Site information also will be posted on Ecology's web site at

http://www.ecy.wa.gov/programs/tcp/sites/jorgensen/forge_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. The list includes individuals, groups, public agencies, elected officials, private businesses, potentially affected parties, and other known interested parties. The list will be maintained at Ecology's Northwest Regional Office and will be updated as needed.

To have your address added or deleted from this mailing list, please contact the Ecology's public involvement coordinator **Justine Asohmbom at (425) 649-7135 or juas461@ecy.wa.gov**.

Fact Sheets

Ecology will mail fact sheets to persons and organizations interested in the Jorgensen Forge site Source Control Investigation 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 may place ads in the *Seattle Times* and *Seattle Post Intelligencer,* to announce public comment periods and public meetings or hearings for the site.

Public Participation 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.

Points of Contact

If you have questions or need more information about this plan or the Jorgensen Forge Site, please contact the following:

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Glossary

Cleanup: Actions taken to deal with a release, or threatened release of hazardous substances that could affect public health and/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.

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.

Hazardous Substance: Any material that poses a threat to public health and/or the environment. Typical hazardous substances are materials that are toxic, corrosive, ignitable, explosive, or chemically reactive.

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.

PCBs (polychlorinated biphenyls): A group of toxic, persistent chemicals. Due to their non-flammability, chemical stability, high boiling point and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications including transformers and capacitators for insulating purposes, and in gas pipeline systems as a lubricant. PCBs are a serious threat to public health because they have been proven to cause cancer in animals. In 1977 they were made illegal to produce, yet large amounts still remain in the environment.

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 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.

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.

TPHs (total petroleum hydrocarbons): Describes a large family of several hundred chemical compounds that originally come from crude oil. Crude oil is used to make petroleum products, which can contaminate the environment. TPH is a mixture of chemicals, but they are all made mainly from hydrogen and carbon, called hydrocarbons. Scientists divide TPH into groups of petroleum hydrocarbons that act alike in soil or water. These groups are called petroleum hydrocarbon fractions. Each fraction contains many individual chemicals.

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

HVOCs (halogenated volatile organic compounds): include a variety of chemicals that become a gas at room temperature. Most such substances are industrial chemicals and solvents. They include light alcohols, acetone, trichloroethylene, perchloroethylene, dichloroethylene, benzene, vinyl chloride, toluene, and methylene chloride. These potentially toxic chemicals are used as solvents, degreasers, paints, thinners, and fuels. Because of their volatile nature, they readily evaporate into the air, increasing the potential exposure to humans. Due to their low water solubility, environmental persistence, and widespread industrial use, they are commonly found in soil and water.