



Public Participation Plan Hardel Mutual Plywood

Cleanup site ID: 3704, Facility site ID: 75128579

**1210 West Bay Drive NW*
Olympia, WA**

* Recent Thurston County records show the Site was divided into five parcels. The addresses of the five parcels are 1410, 1420, 1430, 1510, and 1520 West Bay Drive NW.

Toxics Cleanup Program

Washington State Department of Ecology
Southwest Region Office
Lacey, Washington

April 2025

This document is available on the Department of Ecology's [Hardel Mutual Plywood](#) webpage.¹

Site contacts

To be included in the site record, comments about the cleanup process must be submitted during comment periods. Questions and informal comments or information about the site's history are welcome anytime. Please note that the most up-to-date contact information will be on the [cleanup site webpage](#)².

Ecology

Southwest Region Office

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Potentially Liable Party

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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), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact the Ecology ADA Coordinator by phone at 360-407-6831 or email at ecyadacoordinator@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit [Ecology's website](#)³ for more information.

Language Accessibility

The Department of Ecology offers free translation and interpretation services. If you need help in your preferred language, please call Carolyn Subramaniam at 564-250-0563 and request an interpreter, or email Carolyn.Subramaniam@ecy.wa.gov.

¹ <https://apps.ecology.wa.gov/cleanupsearch/site/3704>

² <https://apps.ecology.wa.gov/cleanupsearch/site/3704>

³ <https://ecology.wa.gov/ADA>

Summary

The Washington Department of Ecology (Ecology) developed this Public Participation Plan. The goal is to ensure meaningful community involvement during cleanup of Hardel Mutual Plywood (site). This plan outlines how Ecology will keep the public informed about contamination investigations and cleanup options at each stage of the process. The plan also details when and how the community can participate in the cleanup process. We encourage the public to engage with the decision-making opportunities and provide input.

Table of Contents

List of Figures	ii
Public Participation Activities	1
How we share information with the community	1
How to share information with us	2
Public Participation Grants	3
Site Information	3
Location.....	3
How the site became contaminated.....	3
Previous Cleanup	4
Current Cleanup.....	6
Area community.....	6
Tribal engagement	7
Washington’s Cleanup Laws	7
Model Toxics Control Act.....	7
State Environmental Policy Act.....	8
Plan Amendments	8
Appendix A. Steps in the MTCA cleanup process	10

List of Figures

Figure 1. Site map	4
Figure 2. Cleanup work completed in 2010.....	5

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

Notices of public comment periods 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 will hold a public meeting if 10 or more people request it.

Ecology may also develop documents outside of comment periods to keep the community updated on the site's status.

Postal mailing list

Ecology maintains a mailing list that includes addresses within at least a quarter-mile radius of the site and relevant local, state, and federal government contacts. People on the mailing list 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 Carolyn Subramaniam at 564-250-0563 or Carolyn.Subramaniam@ecy.wa.gov.

Contaminated Site Register

Public comment periods, events, and other cleanup notices are published in Ecology's [Contaminated Site Register](#).⁴ To receive the *Contaminated Site Register* by email, please [subscribe online](#),⁵ 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 Olympian*. We will also publish notice on our [Public Input & Events Listing](#).⁶

⁴ <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data>

⁵ <https://ecology.wa.gov/site-register>

⁶ <https://ecology.wa.gov/Events/Search/Listing>

Email lists

Ecology maintains an email list to update interested persons about this site. If you would like to be added to the email list for this site, contact Carolyn Subramaniam at 564-250-0563 or Carolyn.Subramaniam@ecy.wa.gov.

Ecology's website and social media platforms

We maintain a website for the [Hardel Mutual Plywood](#) site.⁷ The website 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](#).⁸

Places to see print documents

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

Timberland Olympia Public Library
313 8th Avenue SE
Olympia, WA 98501
360-352-0595

Washington Department of Ecology
Southwest Region Office
300 Desmond Dr SE
Lacey, WA 98503-1274

To schedule an appointment to view documents at Ecology's Lacey office, contact call 360-407-6365 or email PublicDisclosureSWRO@ecy.wa.gov.

How to share information with us

Ecology holds public comment periods and public events to gather input and share information with the community.

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 Steve Teel at 360-890-0059 or Steve.Teel@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.

After a comment period ends, we publish a responsiveness summary which contains all the comments we received and our responses. If the comments result in significant changes to the cleanup documents, then the documents will be revised and re-issued for public review. If the comments do not result in significant changes, then the documents become final.

⁷ <https://apps.ecology.wa.gov/cleanupsearch/site/3704>

⁸ <https://ecology.wa.gov/About-us/Get-to-know-us/News>

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 10 or more people request it.

Events are held 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.

Public Participation Grants

Grants may be available to neighborhood committees, non-profits, and other groups interested in the site. 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 Laura Busby at 360-280-5088 or laura.busby@ecy.wa.gov and Jill Krumlauf at 360-790-5771 or jill.krumlauf@ecy.wa.gov. You may also visit the [Public Participation Grant webpage](#).⁹

Site Information

Location

The Hardel Mutual Plywood site is on the western shore of Budd Inlet. The Site is generally located at 1210 West Bay Drive NW in Olympia. Recent Thurston County records show the Site was divided into five parcels. The addresses of the five parcels are 1410, 1420, 1430, 1510, and 1520 West Bay Drive NW. The site is about 17.8 acres and extends from the railway right-of-way along West Bay Drive east into intertidal and subtidal areas of Budd Inlet (Figure 1).

How the site became contaminated

The property has been used for a variety of wood milling activities since the late 1800s. The most recent use of the property was by a plywood mill operated by Hardel Mutual Plywood (Hardel) from 1951 until 1996. The company stopped operations after a fire severely damaged buildings on site. Those buildings have since been removed.

Historical mill activities resulted in the release of petroleum products, volatile and semi-volatile organic compounds, and metals to soil and groundwater. Contamination from dioxins/furans and carcinogenic polycyclic aromatic hydrocarbon has been found in marine sediment on the shoreline of the site.

⁹ <https://ecology.wa.gov/PPG>



Figure 1. Site map

Previous Cleanup

In 2004, the following contaminants were detected:

- Total petroleum hydrocarbons (TPH), diesel, gasoline, and oil range, including free-floating petroleum product
- Polycyclic aromatic hydrocarbons in soil and groundwater

In 2007, Ecology entered into a legal agreement with Hardel, Agreed Order DE 4108, to begin cleanup. The agreement required Hardel to:

- Conduct a remedial investigation to determine what contaminants are at the site and where they are
- Interim actions to remove floating petroleum
- Write a feasibility study analyzing cleanup options

Hardel completed the remedial investigation in 2007 and identified two areas for concern for soil and groundwater. A supplemental investigation revealed that contamination was moving in groundwater towards Budd Inlet.

Hardel conducted a Feasibility Study in 2009 examining possible cleanup options. They proposed a partial cleanup (Figure 2). Ecology approved the interim action in 2010.

In 2010, Hardel partially cleaned up the site by:

- Removing and crushing concrete building foundations, keeping clean concrete to use as fill material
- Removing contaminated soil and filling the areas with clean soil. Then, Hardel covered the property with one foot of clean recycled crushed concrete.
- Removing free-floating contaminants
- Sampling soil to ensure all contaminated soil was removed

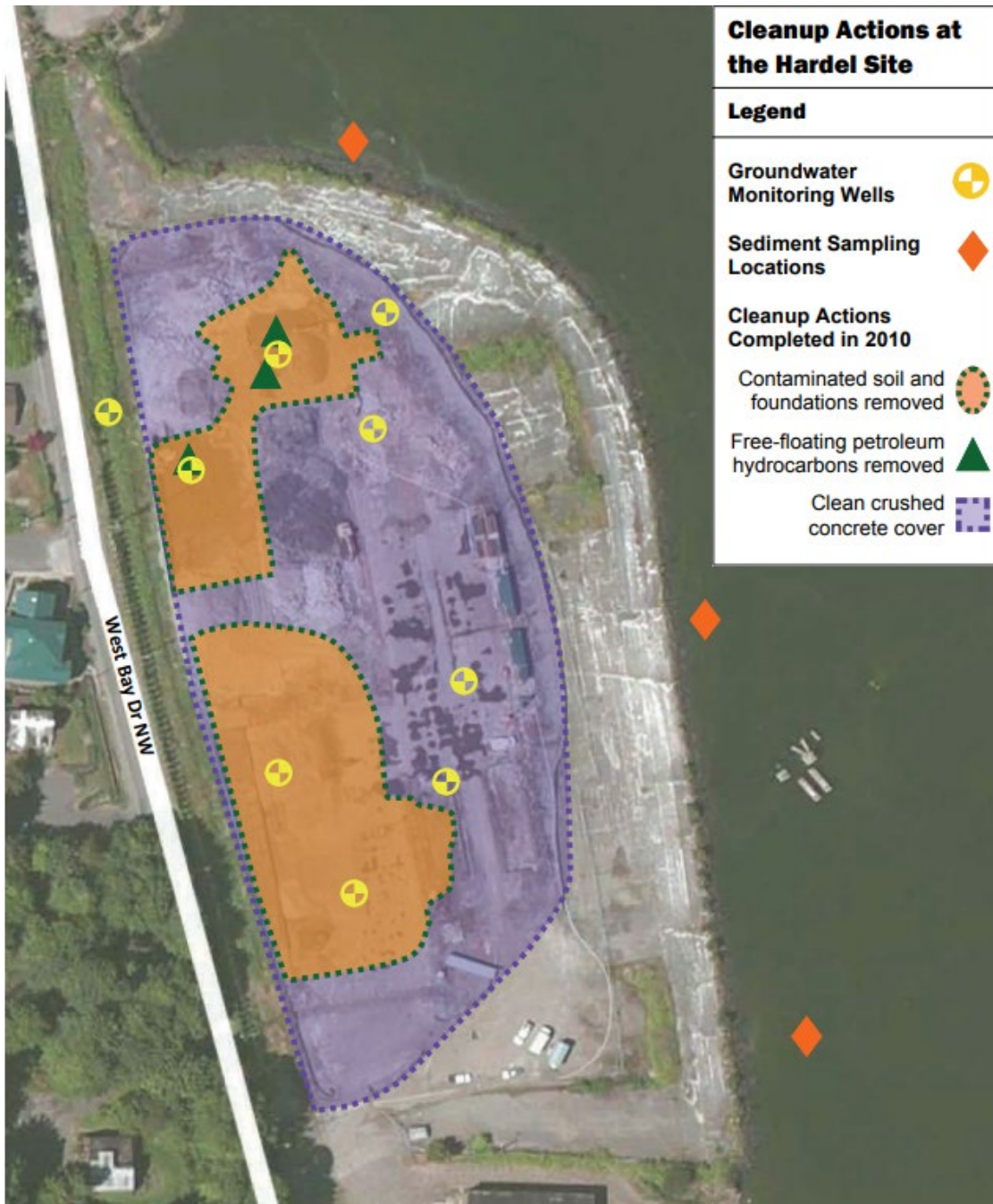


Figure 2. Cleanup work completed in 2010.

After completing the interim action, Hardel sampled groundwater for one year and found no contaminants above the cleanup levels. In August 2012, Ecology considered the cleanup to be complete. Ecology:

- issued a Satisfaction of Agreed Order letter stating that Hardel had completed the requirements of Agreed Order DE 4108.
- issued a No Further Action determination stating that no more cleanup was needed at the site, based on information at the time.

Current Cleanup

In 2021, West Bay Development Group (West Bay) bought the property from Hardel. During due-diligence, West Bay found several additional areas of contamination in soil and groundwater that were not identified in previous cleanup work. This contamination included total petroleum hydrocarbons, volatile and semi-volatile organic compounds, tetrachloroethylene, and metals.

Therefore, Ecology took back the No Further Action determination from 2012. While the terms of Agreed Order DE 4108 were satisfied, additional cleanup is needed at this site.

Ecology worked with West Bay to negotiate a new legal agreement, Agreed Order DE 21726, requiring West Bay to conduct additional cleanup activities. The Agreed Order requires West Bay to:

- Complete a supplemental remedial investigation and feasibility study identifying the extent of contamination and comparing cleanup options. These documents will build on previous sampling work to expand our understanding of the site.
- Write a preliminary Draft Cleanup Action Plan suggesting a plan for cleanup at the site.

Ecology will hold a public comment period to gather public input before entering Agreed Order DE 21726.

The public will have the opportunity to provide comments on the supplemental remedial investigation and feasibility study, and draft Cleanup Action Plan when the documents are ready.

Area community

The site is located on the western shore of Budd Inlet in Olympia. It is currently zoned for Urban Waterfront use. There are residential homes, a public park, an adult assisted living facility, religious centers, and businesses in the area around this cleanup site.

Demographic and environmental health information can change over time. Ecology will review information about the community around this cleanup site before each new comment period. This area will include at least a quarter-mile radius around the cleanup site.

Data sources may include:

- [Washington Department of Health: Health Disparities Map](#)¹⁰

When appropriate, Ecology will provide outreach materials in languages other than English. Ecology will reach out to cultural community organizations as part of our outreach and provide information in other languages as appropriate following federal guidance.¹¹

We strive to make our public participation efforts as inclusive as possible and welcome your input about how to best reach the nearby community.

To request information in a language other than English, or provide input, contact Carolyn Subramaniam at 564-250-0563 or email Carolyn.Subramaniam@ecy.wa.gov.

Tribal engagement

We invite Tribes to engage with us in a separate process outlined in [WAC 173-340-620](#).¹² We will develop a Tribal engagement plan for this site and when it is prepared, it will be available in the “Documents” section of the site’s webpage.

There may be earth-disturbing work involved in the cleanup activity. Before any earth disturbing activity occurs, we participate in the consultation for cultural resource protection described in [WAC 173-340-815](#).¹³

Washington’s Cleanup Laws

Ecology uses the Model Toxics Control Act (MTCA) and accompanying regulations for cleanup activities. 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.

¹⁰ <https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map>

¹¹ 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).

¹² <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-620>

¹³ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-815>

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 \(WAC\)](#).¹⁴ Ecology investigates 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 [Contaminated Sites List](#),¹⁵ 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 can get involved by commenting on the cleanup process.

Under MTCA, [Washington's cleanup process](#)¹⁶ includes multiple steps (Appendix A), with opportunities for the public to review and comment on cleanup documents. A partial cleanup (called an interim action) can occur at any time during the cleanup process. The public is provided an opportunity to review and comment on planned interim action work as well.

State Environmental Policy Act

MTCA cleanups also require evaluation under the State Environmental Policy Act (SEPA; [Chapter 197-11 WAC](#)¹⁷). Under SEPA, the potential for significant adverse environmental impacts from a project or action must be evaluated by state and local agencies when making decisions. This evaluation is subject to public review and comment for at least two weeks.

Plan Amendments

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We review it as the cleanup progresses and amend it as necessary. You may suggest amendments to Carolyn Subramaniam at 564-250-0563 or Carolyn.Subramaniam@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.

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.

¹⁴ <https://apps.ecology.wa.gov/publications/publications/9406.pdf>

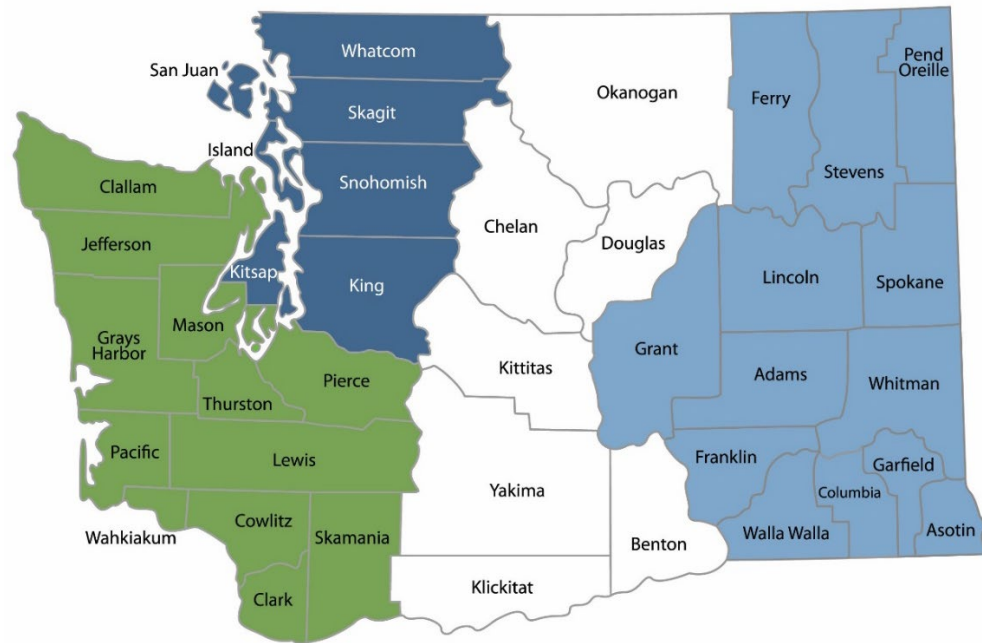
¹⁵ <https://apps.ecology.wa.gov/cleanupsearch/reports/cleanup/contaminated>

¹⁶ <https://ecology.wa.gov/MTCA-process>

¹⁷ <https://app.leg.wa.gov/WAC/default.aspx?cite=197-11>

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	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO 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	PO Box 47600 Olympia, WA 98504	360-407-6000

Appendix A. Steps in the MTCA cleanup process

The cleanup process is defined in the Model Toxics Control Act (MTCA), Washington’s cleanup law. See the attached, accessible PDF for details.

Washington's Cleanup Process



Public participation plans and comment periods are only required for cleanups under a legal agreement with Ecology. Otherwise, all cleanups follow the same steps. The steps are defined by Washington's cleanup law, the Model Toxics Control Act.

