

DEPARTMENT OF
ECOLOGY
State of Washington

PUBLIC PARTICIPATION PLAN
BOEING ISAACSON THOMPSON
TUKWILA, WASHINGTON

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Introduction

The Washington State Department of Ecology (Ecology) developed this public participation plan according to the Model Toxics Control Act (MTCA). This plan is designed to promote meaningful community involvement during the investigation and cleanup of the Boeing Isaacson Thompson site, located in Tukwila, Washington next to the Lower Duwamish Waterway (LDW). This plan outlines and describes the tools Ecology will use to inform the public about Boeing Isaacson Thompson site cleanup activities, and it describes how the community can become involved in this process.

Ecology and the potentially liable person (PLP), The Boeing Company, negotiated a legal agreement called an Agreed Order that formally describes their working relationship. Under the Agreed Order, The Boeing Company will conduct a remedial investigation, develop a feasibility study, and prepare a draft cleanup action plan (dCAP). The remedial investigation/feasibility study (RI/FS) is required under WAC 173-340-350 and is part of the cleanup process for this site. The RI will determine the nature and extent of contamination in soil, groundwater, stormwater and stormwater solids, seeps, and sediments. The FS will use the results of the RI to evaluate and select cleanup action alternatives for the site.

Cleanup actions might be identified during the RI or FS process that will eliminate or minimize current releases of contamination to the Lower Duwamish Waterway (LDW) or actions that are necessary to prevent an imminent threat to human health or the environment. Ecology will consider implementing such cleanup actions as interim actions under the existing Agreed Order.

Project Description

Location

This site is located at 8625-8811 E. Marginal Way S. in Tukwila, Washington on the east bank of the LDW. The site includes 2 adjacent properties owned by The Boeing Company, the Isaacson (Boeing Isaacson) property on the north and the Thompson (Boeing Thompson) property on the south. The site is bordered by other cleanup sites: to the north by the Jorgensen Forge site, to the south by the former Kenworth Truck (PACCAR) site, and to the west by the LDW site (See

figure on page 12). The LDW is controlled by the Port of Seattle (Port), and includes a strip of uplands along the west side of the Boeing Isaacson property. The final site boundaries will be defined by the extent of contamination determined during the RI.

Site Background

Boeing Isaacson Property

The Boeing Isaacson property is located along the east side of the LDW at approximately river mile (RM) 3.7 to 3.8, as measured from the southern tip of Harbor Island. The property is rectangular shaped, long in the east-west direction, and is situated between the Port's LDW property on the west and the East Marginal Way S road on the east. The property is bordered on the south by the Boeing Thompson property and on the north by the Jorgensen Forge property. The western Boeing Isaacson property boundary does not extend all the way to the water; a strip of land consisting of the shoreline bulkhead and approximately 20 to 30 feet inshore of the bulkhead is identified in King County parcel ownership records as part of the waterway and therefore is under Port control.

The Boeing Company purchased this property from the Isaacson Steel Company on March 14, 1984. The parcel was originally 12.29 acres in size; however, a property boundary adjustment was recorded on November 8, 2001, which moved the southern Isaacson property line north to its current location, reducing this parcel by 2.45 acres to its present size of about 9.8 acres. The topography is relatively flat.

The fill material placed in Slip 5 reportedly consisted of slag waste and soil; land reclamation along the LDW was primarily composed of imported soil from offsite sources, but may also have included slag, fire brick, and material dredged from the LDW (Dames & Moore 1983). Soil sampling in 1983 identified high concentrations of metals in the fill material in the southern and western margins of the Boeing Isaacson property.

Isaacson Steel Company purchased the Isaacson Iron Works plant from the U.S. Navy in the 1950s, and expanded the steel fabrication facility in Building 14-05 during the 1950s and 1960s (Landau 1988a). At that time fill material, including slag/fire brick material, was used to extend the site area into Slip 5 by about 20 to 50 feet. Plant expansion and development continued into the 1960s. Additional fill was placed within Slip 5 during this time, and a bulkhead was constructed along the LDW and backfilled to reclaim an additional 50 feet of land between the waterway and the Isaacson Steel property line (Dames & Moore 1983). Land reclamation along the LDW primarily used imported soil from offsite sources but may also have included slag, fire brick (which typically contained asbestos), and material dredged from Slip 5 (Dames & Moore 1983). In approximately 1966, Slip 5 was completely filled as part of site development of the Boeing Thompson property.

Between the mid-1940s and 1967, a galvanizing plant was constructed and operated in the northeast corner of the property.

Boeing Thompson Property

The Boeing Thompson property is adjacent to the south of Boeing Isaacson property, along the east side of the LDW at approximately RM 3.8 to 3.9, as measured from the southern tip of Harbor Island. The property is approximately 19.35 acres in size, and is situated between the LDW on the west, East Marginal Way S. road on the east, and the 8801 Site (former Kenworth Truck/Paccar property) on the south.

The Boeing Company purchased this property from the Parr Seattle Company in January 1957. The property is located in an area of extensive fill placed as part of the re-channelization of the LDW; the thickest fill layer was observed within the area of the former Slip 5 (ERM 2000b). The topography is relatively flat, with a steep, armored LDW shore.

Current Site Use

Boeing Isaacson Property

The Boeing Isaacson property is currently vacant. The property is completely paved with asphalt and concrete, and there are no permanent buildings present on the site. The concrete is a remnant of former steel mill operations and consists primarily of slab-on-grade, spread footings, and at least 20 large foundations that supported overhead cranes used during the active steel mill operations (ERM 2000a).

The property contains nine catch basins and two Vortech vaults that drain to the Boeing Thompson storm drain system, as well as five storm drain manholes that are connected to KC Airport SD #2/PS78 EOF. In addition, six edge drains are located on Port uplands along the LDW shoreline. The purpose, function, and configuration of the edge drains is unclear.

A pipe of unresolved origin is reportedly located near the Port of Seattle/Jorgensen Forge property boundary (Windward 2007c); this pipe is not shown on a stormwater system map provided by The Boeing Company. No additional information about this pipe was available.

Groundwater generally flows from east to west, toward the LDW. Three groundwater monitoring wells are located on the Boeing Isaacson property: I-200 (upgradient), and I-104 and I-203 (downgradient). Two additional downgradient wells are located on the Boeing Thompson property (I-205 and I-206).

Boeing Thompson Property

As of December 31, 2007, industrial/manufacturing operations were relocated from the Boeing Thompson site to other The Boeing Company facilities, primarily the aircraft final assembly locations in Renton and Everett. Current activities reportedly include storage of surplus vehicles and preparation of the site for reuse or sale.

According to the facility's 2001 Stormwater Pollution Prevention Plan (The Boeing Company 2001), nine buildings at the site were used for industrial operations and associated utilities/logistics. The majority of the site area is composed of outdoor parking areas, storage areas, and transportation lanes. Industrial activity consisted of assembly of jet engines for The Boeing Company commercial aircraft. Specific activities included testing, machining, and painting of engine sub-assemblies.

The storm drain system at the Boeing Thompson property consists of 42 catch basins, 15 storm drain manholes, and two oil-water separators. The structures drain through two active private outfalls to the LDW. These outfalls are partially or entirely submerged during high tides. There are also two storm drain manholes that are connected to KC Airport SD #2/PS78 EOF.

The facility operates under an industrial stormwater general permit, No. SO3-000148, which was originally issued on December 22, 1993 and was extended to May 2008. Ecology has proposed to extend the expired general permit until April 30, 2009. A stormwater compliance inspection was conducted by Ecology on April 6, 2007, which indicated that the benchmark level for total zinc had been exceeded for the preceding three quarters, and that a Level 1 response was required (Ecology 2007c).

Potential sources of stormwater pollution include:

- Materials and wastes stored in tanks, which includes a 550-gallon aboveground diesel storage tank on the west side of Building 14-02, a 240-gallon aboveground diesel storage tank on the north side of Building 14-13, one 5,000-gallon aboveground storage tank on the west side of Building 14-01 for aqueous degreaser fluids (never been used), and one 20,000-gallon underground diesel/heating fuel storage tank on the west side of Building 14-02 that was closed in place. The two small diesel tanks are active: one is used for the emergency generator and the other is associated with the fire suppression system pumps. All tanks (except the underground storage tank that was closed in place) have secondary containment.
- Outside material stored in containers in the Material Storage Sheds near Building 14-03.

- Waste previously stored in containers at the Waste Storage Area near Building 14-03; this material has been moved to a hazardous waste accumulation area located inside building 14-01.

According to the Stormwater Pollution Prevention Plan (The Boeing Company 2001), the facility employs/employed various BMPs to minimize the potential for releases of contaminants to the environment. Manufacturing occurred inside buildings. Outside material storage areas are covered and provided with spill containment, and are constructed to reduce the influx of windborne precipitation. Storage and maintenance of materials, wastes, and tanks is conducted in accordance with applicable regulations. A hazardous waste management plan and a hazardous materials management plan have been developed and implemented for the facility (The Boeing Company 2001).

Several catch basins to the east of Boeing property drain the paved shoulder on the west side of East Marginal Way S. flow into the Boeing Thompson storm drain system near the main gate. This flow combines with other property runoff, passes through an oil-water separator, then discharges to the LDW at an outfall on the northern portion of the Boeing Thompson shoreline (The Boeing Company 2001).

Non-stormwater discharges from the Boeing Thompson property result from fire hydrant flushing, water line flushing, and irrigation drainage; these are not associated with industrial discharges and are not exposed to contaminants before discharge.

Merrill Creek Holdings, LLC, the owner of the property located immediately south of Boeing Thompson (the 8801 East Marginal Way S. Site), identified two drainage pipes that discharge to their property from the south wall of the Boeing Thompson property. The Boeing Company reports that one of these drainage pipes is a 12-inch perforated culvert pipe that drains groundwater and releases pressure from behind the concrete wall. This culvert pipe has no tie-ins with the Boeing Thompson storm drain system. The second pipe is identified as a foundation drain which also has no tie-ins with the Boeing Thompson storm drain system.

Contaminants of Concern

Contamination at this site is due to industrial operations and facility development. The contaminants of concern in the soil are:

- Arsenic, Cadmium, Chromium, Lead, Mercury, Nickel, PCBs, Petroleum Hydrocarbons, Zinc

The contaminants of concern in the groundwater are:

- Arsenic, Barium, Chromium, Lead

The contaminants of concern in the stormwater are:

- Antimony, Arsenic, Lead, Petroleum Hydrocarbons

The chemicals of concern in sediments resulting from exceedances above Sediment Management Standards, Chapter 173-204 WAC, Sediment Quality Standards (SQS) and Cleanup Screening Levels (CSL) are:

Chemical of Concern (COC)	Surface Sediment ($\leq 4''$ below surface)		Subsurface Sediment ($> 4''$ below surface)	
	> SQS	> CSL	> SQS	> CSL
Metals				
Arsenic	●	●	●	●
PAHs				
Acenaphthene	●		●	
Benzo(a)anthracene	●			
Benzo(a)pyrene	●	●		
Benzo(b)fluoranthene	●			
Benzo(g,h,i)perylene	●	●	●	
Benzo(k)fluoranthene	●			
Benzo(a)fluoranthenes (total)	●	●		
Chrysene	●		●	
Dibenzo(a,h)anthracene	●	●		
Fluoranthene	●		●	
Fluorene	●			
Indeno(1,2,3-cd)pyrene	●	●	●	
Phenanthrene	●		●	
Total HPAH	●			
Total LPAH	●			
Phthalates				
Bis(2-ethylhexyl)phthalate	●	●	●	●
Butyl benzyl phthalate	●			
Other SVOCs				

Chemical of Concern (COC)	Surface Sediment ($\leq 4''$ below surface)		Subsurface Sediment ($> 4''$ below surface)	
	> SQS	> CSL	> SQS	> CSL
Benzoic acid	●	●		
Benzyl alcohol			●	●
Dibenzofuran	●		●	
<i>PCBs</i>				
PCBs (total)	●		●	●

(Ecology 2009)

Previous Cleanup Work

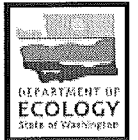
Environmental investigations and remedial actions, of soils in Building 14-05 storage bays and for moving a 48" stormwater line, were conducted at the site from 1983 through 1991 (SAIC, 2008). Some of the investigations were also conducted on the Thompson property. Incomplete independent cleanup actions were conducted on the Isaacson property to address elevated metals concentrations in soil and groundwater. Much of the excavated contaminated soil was treated on-site by stabilization and contained by capping. In 2008, The Boeing Company independently removed some of those soils to make the property more useful.

Current Activity

Ecology and The Boeing Company are negotiating a draft Agreed Order to conduct an RI/FS and prepare a draft cleanup action plan.



Exhibit A
Boeing and adjacent properties



Lower Duwamish Waterway Cleanup

The Boeing Isaacson Thompson site is located within the source control study area for the LDW site (FS# 42927743) in south Seattle. The LDW site is a Superfund site that consists of the 5.5 mile stretch of the Duwamish River that flows north into Elliot Bay at the south end of Harbor Island. The LDW site is designated as a contaminated site under both state and federal law due to contaminants in the river and intertidal sediments. The Boeing Company site is one of several sites near the LDW that will be cleaned up to reduce the threat to human health and the environment from releases of hazardous substances, and to assist in preventing recontamination of the sediments after the LDW site cleanup is complete.

The sediments in the LDW site contain a wide range of contaminants due to years of industrial activity and runoff from urban areas. Ecology and EPA are working together to clean up contaminated sediments in the LDW site and to control sources of recontamination from nearby areas.

In 2000, EPA and Ecology entered into an Administrative Order on Consent with King County, the Port of Seattle, the City of Seattle, and The Boeing Company. This legal agreement requires these four parties perform a Remedial Investigation (RI) and Feasibility Study (FS) of sediment contamination in the waterway. Information about the RI/FS for the LDW site is located at <http://yosemite.epa.gov/r10/cleanup.nsf/sites/lduwamish>

EPA is leading the RI/FS work, and Ecology is leading source control efforts. The source control efforts will prevent recontamination of the waterway after cleanup. Source control is the process of finding and then stopping or reducing releases of pollution to the river from various sources such as direct discharges via piped outfalls, bank erosion from adjacent properties, surface runoff from adjacent properties, groundwater discharge, air deposition, and spills. It includes identifying and managing sources of contamination to waterway sediments in coordination with sediment cleanups.

Ecology is coordinating these source control efforts with the City of Seattle, King County, the Port of Seattle, the City of Tukwila, and EPA. Ecology partners with these other agencies through the Source Control Work Group. Their work includes a business inspection program; monitoring sediments from storm drain systems; permitting to prevent direct discharges to the waterway; contaminated site cleanups; and testing various household products/materials to determine if they contain chemicals found in waterway sediments.

As part of these source control efforts, Ecology is developing Source Control Action Plans (SCAPs) for the 24 sub-basins (or source control areas) that drain to the LDW site. The SCAPs identify potential contamination sources and the actions needed to keep sediments from being contaminated again after cleanup occurs. In addition, the SCAPs describe source control actions that are planned or currently underway, and sampling and monitoring activities that will be conducted to identify additional sources.

The Boeing Isaacson Thompson site is located within the River Mile (RM) 3.7 – 3.9 East (designated as Early Action Area 6) source control area. The SCAP for this area is based on a thorough review of information pertinent to sediment recontamination in this source control area, as presented in *Lower Duwamish Waterway, RM 3.7-3.9 East (Early Action Area 6) Source Control Area Summary of Existing Information and Identification of Data Gaps Report* (SAIC 2008). The Data Gaps report and the SCAP (Ecology 2009) for this source control area are located on Ecology's website:

http://www.ecy.wa.gov/programs/tcp/sites/lower_duwamish/sites/early_action_area_6/EAA_6.html

The Duwamish River Cleanup Coalition

The Duwamish River Cleanup Coalition (DRCC) is an advisory group to EPA and Ecology and works with the South Park and Georgetown neighborhoods and other stakeholders 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, tribal, and small business groups affected by ongoing pollution and cleanup plans for the Lower Duwamish Waterway. The coalition members include: Community Coalition for Environmental Justice, the Duwamish Tribe, The Green-Duwamish Watershed Alliance, I'M A PAL Foundation, Environmental Coalition of South Seattle, Georgetown Community Council, People for Puget Sound, Puget Soundkeeper Alliance, South Park Neighborhood Association, Washington Toxics Coalition, and Waste Action Project.

DRCC is a formal "community advisory group" recognized by EPA and representing the interests of the community toward the cleanup work along the LDW. DRCC receives public participation grant funding from Ecology. They also receive technical assistance grants from EPA for technical advisors to review all Lower Duwamish Superfund cleanup related studies and plans. They are involved in all aspects of the proposed Superfund cleanup and related MTCA cleanups. DRCC is working with Ecology to ensure that the cleanup and source control measures meet community standards.

Enhanced Public Participation

Ecology will work with EPA and stakeholders according to the enhanced public participation efforts that occur for the LDW Superfund site. Ecology site managers and community involvement coordinators may participate in community meetings and events as needed. Ecology will coordinate with the DRCC throughout the public involvement process. This may include such activities as coordination for public meetings and sharing drafts of documents with DRCC for review, as appropriate.

Community Profile

For decades much of the land along to the LDW 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, and airplane parts manufacturing.

Although the LDW 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 on the western shore of the LDW, and the Georgetown neighborhood is on the eastern side of the waterway. The residents of the community are well known for their commitment to neighborhood issues particularly related to the ongoing site cleanups along the LDW. 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 Lower Duwamish Waterway. Native Americans of the Duwamish Tribe were the first residents of South Park who lived on the shores of the Duwamish River for thousands of years. This area 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 South Park. The curving 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 people complained and the City of Seattle changed the zoning to low-density residential. The City of Seattle built the South Park Community Center in 1989 which remains a vital resource within the community. The South Park Community Center offers a wide variety of free and low cost programs and special events. Special events include free breakfasts and family events. The community center provides before and after-school programs and school break camps for students. They also offer adult classes ranging from yoga to technology to English classes. South Park is also served by the City-owned neighborhood center, managed by the South Park Neighborhood Association. The neighborhood center houses several non-profit and city services including the South Park Food Bank, City-sponsored South Park Action Agenda, and the Environmental Coalition of South Seattle.

The Seattle Public Library opened the new South Park branch at 8604 Eighth Avenue South (at Cloverdale Street) in September 2006. This new branch is 5,019 square feet and has the capacity to hold 18,700 books and materials (about one-third of the collection is Spanish-language, including bilingual children's materials and Spanish Language fiction and non-fiction). The library also has bilingual staff on hand to answer questions and to help patrons.

The South Park neighborhood is comprised of about 3,717 people of various ethnicities: 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 is \$20,917 (based on records from 2005). A variety of retail and service businesses are located along 14th Avenue South. Data from the Seattle Office of Economic Development lists the primary categories of employment in South Park as wholesale trade, transportation and utilities; construction/resources; manufacturing; and services.

Georgetown Community Description

The Georgetown neighborhood is located in South Seattle, on the east side of the LDW 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, and later annexed by the City of Seattle.

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 neighborhood is home to large employers such as The Boeing Company and King County International Airport.

The community is host to local events such as art walks, an annual Arts and Garden Tour. The neighborhood is home to historic buildings such as the Old Georgetown City Hall, and the Georgetown Steam Plant. The South Seattle Community College has recently revitalized its Georgetown Campus and is home to the Puget Sound Industrial Excellence Center Apprenticeship and Education Center. The campus offers more than 25 apprenticeship programs including masonry, meat cutters, electricians, iron workers, and cosmetology. The neighborhood

is also home to The Georgetown Community Council meets once a month and is very active in the community.

Key Community Concerns and Issues

Ecology and EPA conducted interviews with community members, environmental organizations, and community organizations in October 2002 for the LDW Site Community Involvement Plan. The Boeing Isaacson Thompson site is located within the larger LDW site. Ecology conducted an abbreviated version of community interviews in 2006 and determined that the concerns raised in 2002 were still pertinent. In 2008, Stakeholder groups provided comments to EPA and Ecology on the LDW Remedial Investigation Draft Report developed for the LDW Superfund Site. Although these comments are directed to the entire Superfund site, they are relevant for the Boeing Isaacson Thompson site because it is part of the larger Superfund site. The stakeholder comments indicated that their concerns have remained constant with the concerns outlined below.

There is clear interest in this cleanup process along the LDW. The following is representative of significant concerns and issues expressed during the community interviews. Ecology will work to respond to community concerns through 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:** Stakeholders are concerned that living close to the LDW could affect their health. They 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:** Stakeholders expressed concern for fish and wildlife. Sea lions, salmon, bottom fish, crabs, mussels, clams, shrimp, 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 LDW.

- **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 and that calculated cleanup levels for many contaminants will not be strict enough. There is also concern that the current efforts to control ongoing sources of pollution will not be enough to actually control the sources.
- **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 LDW 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 LDW neighborhood as an industrial area, others are concerned that it is perceived as a dumping ground.
- **Tribal Rights:** Some community members are concerned that the tribal rights to harvest fish and shellfish in the LDW are not being honored at a level protective of these treaty rights.

Other 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 Participation Activities

Ecology uses a variety of activities to facilitate public participation in the investigation and cleanup of MTCA sites. Ecology will integrate this input into its decisions as much as is feasible.

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's investigation and cleanup.

Formal Public Comment Periods

Comment periods are the primary method Ecology uses to get feedback from the public on proposed investigation and 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 submit comments in writing, orally, and via e-mail. 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 to the document(s) put out for public comment based on input from the public. If significant changes to the document(s) are made, then a second comment period may be held. If no significant changes are made, then the draft document(s) will be accepted and finalized.

Future public comment periods will be held for other documents and legal agreements that are developed for the site.

Public Meetings and Hearings

Public meetings may be held at key points during the investigation and cleanup process. Public comment is accepted during public meetings. 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 two repositories for the Boeing Isaacson Thompson site.

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

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

http://www.ecy.wa.gov/programs/tcp/sites/boeingIsac/boeingIsac_hp.html

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 Project Coordinator, Ronald W. Timm**, at (425) 649-7185 or rtim461@ecy.wa.gov.

Fact Sheets

Ecology will mail fact sheets to persons and organizations interested in the Boeing Isaacson Thompson site 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* or in available local newspapers to announce public comment periods and public meetings or hearings for the site.

Ecology's goal is to be transparent to the community and all other stakeholders. This will be done by posting electronic documents on Ecology's website for stakeholder review at key points in the Boeing Isaacson Thompson site cleanup process. The stakeholders will be able to see the planned schedule for the next phase of work at the Boeing Isaacson Thompson site by reviewing the Agreed Order for the site.

Public Participation Plan Update

This public participation plan may be updated as the project proceeds. If a substantial change 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 Boeing Isaacson Thompson site, please contact:

Ronald W. Timm, Project Coordinator
Washington State Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008
Tel: (425) 649-7185
Email: rtim461@ecy.wa.gov

Glossary

Agreed Order: A legal document issued by Ecology which formalizes an agreement between the department and potentially liable persons (PLPs) for the actions needed at a site. An agreed order is subject to public comment. If an order is substantially changed, an additional comment period is provided.

Arsenic: A metallic element that forms a number of poisonous compounds, arsenic is found in nature at low levels mostly in compounds with oxygen, chlorine, and sulfur.

Cleanup Action: Any remedial action, except interim actions, taken at a site to eliminate, render less toxic, stabilize, contain, immobilize, isolate, treat, destroy, or remove a hazardous substance that complies with cleanup levels; utilizes permanent solutions to the maximum extent practicable; and includes adequate monitoring to ensure the effectiveness of the cleanup action.

Cleanup Action Plan: A document which identifies the cleanup action and specifies cleanup standards and other requirements for a particular site. After completion of a comment period on a Draft Cleanup Action Plan, Ecology will issue a final Cleanup Action Plan.

Cleanup Level: The concentration of a hazardous substance in soil, water, air or sediment that is determined to be protective of human health and the environment under specified exposure conditions.

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.

Environment: Any plant, animal, natural resource, surface water (including underlying sediments), ground water, drinking water supply, land surface (including tidelands and shorelands) or subsurface strata, or ambient air within the state of Washington.

Facility: 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 or, placed, or otherwise come to be located.

Feasibility Study (FS): A study to evaluate alternative cleanup actions for a site. A comment period on the draft report is required. Ecology selects the preferred alternative after reviewing those documents.

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

Hazardous Sites List: A list of sites identified by Ecology that requires further remedial action. The sites are ranked from 1 to 5 to indicate their relative priority for further action.

Hazardous Substance: Certain categories of substances defined by law and regulation that pose a threat to human health and/or the environment. Typical hazardous substances are materials that are toxic, corrosive, ignitable, explosive, or chemically reactive.

Independent Cleanup Action: Any remedial action conducted without Ecology oversight or approval, and not under an order or decree.

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.

Interim Action: Any remedial action that partially addresses the cleanup of a site.

Model Toxics Control Act (MTCA): Washington State's law that governs the investigation, evaluation and cleanup of hazardous waste sites. Refers to RCW 70.105D, and the implementing regulation is Chapter 173-340 WAC. It was approved by voters at the November 1988 general election and known as Initiative 97.

Monitoring Wells: Special wells drilled at specific locations on or off a hazardous waste site where groundwater can be sampled at selected depths and studied to determine the direction of groundwater flow and the types and amounts of contaminants present.

Natural Background: The concentration of hazardous substance consistently present in the environment which has not been influenced by localized human activities.

National Priorities List (NPL): EPA's list of hazardous waste sites identified for possible long-term remedial response with funding from the federal Superfund trust fund.

Owner or Operator: Any person with any ownership interest in the facility or who exercises any control over the facility; or in the case of an abandoned facility, any person who had owned or operated or exercised control over the facility any time before its abandonment.

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 capacitors 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.

Petroleum Hydrocarbons: Compounds of carbon and hydrogen that are derived from naturally occurring petroleum sources or from manufactured petroleum products (such as refined oil, coal, and asphalt).

Polycyclic Aromatic Hydrocarbon (PAH): These can be naturally occurring compounds in petroleum or coal tars, some of which are long-lasting in the environment and carcinogenic. These compounds are also formed from the combustion of organic material and are ubiquitous in the environment. PAHs are commonly formed by forest fires and by the combustion of fossil fuels.

Potentially Liable Person (PLP): Any person whom Ecology finds, based on credible evidence, to be liable under authority of RCW 70.105D.040.

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 or county) newspaper of largest circulation; and opportunity for interested persons to comment.

Public Participation Plan: A plan prepared under the authority of WAC 173-340-600 to encourage coordinated and effective public involvement tailored to the public's needs at a particular site.

Release: Any intentional or unintentional entry of any hazardous substance into the environment, including, but not limited to, the abandonment or disposal of containers of hazardous substances.

Remedial Action: Any action to identify, eliminate, or minimize any threat posed by hazardous substances to human health or the environment, including any investigative and monitoring activities of any release or threatened release of a hazardous substance and any health assessments or health effects studies.

Remedial Investigation (RI): A study to define the extent of contamination problems at a site.

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.

A comment period on the draft report is required.

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 mailed, at a minimum, to those who provided comments and its availability is published in the Site Register.

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.

Site Characterization Report: A written report describing the site and nature of a release from an underground storage tank, as described in WAC 173-340-450 (4) (b).

Site Register: Publication issued every two weeks of major activities conducted statewide related to the study and cleanup of hazardous waste sites under the Model Toxics Control Act. To receive this publication, please call (360) 407-7200.

Superfund: The federal government's program to clean up the nation's uncontrolled hazardous waste sites.

Surface Water: Lakes, rivers, ponds, streams, inland waters, salt waters, and all other non-underground waters and courses within the state of Washington or under the jurisdiction of the state of Washington.

TCP: Toxics Cleanup Program at Ecology

Total Petroleum Hydrocarbons (TPH): A scientific measure of the sum of all petroleum hydrocarbons in a sample (without distinguishing one hydrocarbon from another).

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

Underground Storage Tank (UST): An underground storage tank and connected underground piping as defined in the rules adopted under Chapter 90.76 RCW.

Zinc: Zinc is a metallic chemical element; it has a white color with a bluish tinge. It has a high resistance to atmospheric corrosion. A major use is as a protective coating for iron and steel sheet and wire. Excess zinc in the body interferes with the metabolism of other minerals in the body.

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