

**ECOLOGY'S DRAFT PUBLIC PARTICIPATION PLAN**

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**Site Cleanup:**

**JELD-WEN SITE  
(FORMERLY NORD DOOR)**

300 West Marine View Drive  
Everett, Washington

**DRAFT PUBLIC PARTICIPATION PLAN**

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**Prepared by:**

Washington State Department of Ecology



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## **This plan is for you!**

This public participation plan is prepared for the JELD-WEN site cleanup as part of the requirement of the Model Toxics Control Act (MTCA). The plan provides information about MTCA cleanup actions and requirements for public involvement, and identifies how Ecology and JELD-WEN will support public involvement throughout the cleanup. The plan is intended to encourage coordinated and effective public involvement tailored to the community's needs at JELD-WEN.

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If you need this publication in an alternate format, please call the Toxics Cleanup Program at (360) 407-7170. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call (877) 833-6341 (TTY).

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## 1.0: Introduction and Overview of the Public Participation Plan

This Public Participation Plan explains how you can become involved in improving the health of your community. It describes public participation opportunities that will be conducted during the cleanup as part of a cooperative agreement between the Washington State Department of Ecology (Ecology) and JELD-WEN, Inc. (JELD-WEN), formerly Nord Door. This agreement, called an Agreed Order, is a legal document in which JELD-WEN and Ecology agree to decide on cleanup actions for the JELD-WEN site, located at 300 West Marine View Drive, in Everett, Washington. These cleanup actions, and the public participation process that helps guide it, are established in Washington's Model Toxics Control Act (MTCA).<sup>1</sup>

Under MTCA, Ecology is responsible for providing timely information and meaningful opportunities for the public to learn about and comment on important cleanup decisions before they are made. The goals of the public participation process are to promote understanding of the cleanup process so that the public has the necessary information to participate, and to encourage involvement through a variety of public participation opportunities.

This Public Participation Plan provides a framework for open dialogue about the cleanup among community members, Ecology, cleanup site owners, and other interested parties. It outlines basic MTCA requirements for community involvement activities that will help ensure that this exchange of information takes place during the investigation and cleanup, which include:

- Notifying the public about available reports and studies about the site;
- Notifying the public about review and comment opportunities during specific phases of the cleanup investigation;
- Providing appropriate public participation opportunities such as fact sheets to learn about cleanup documents, and if community interest exists, holding meetings to solicit input and identify community concerns; and
- Considering public comments received during public comment periods.

In addition to these basic requirements, the plan may include additional site-specific activities to meet the needs of your community. Based upon the type of the proposed cleanup action, the level of public concern, and the risks posed by the site, Ecology may decide that additional public involvement opportunities are appropriate.

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<sup>1</sup> The Model Toxics Control Act (MTCA) is the hazardous waste cleanup law for the State of Washington. The full text of the law can be found in Revised Code of Washington (RCW), Chapter 70.105D. The legal requirements and criteria for public notice and participation during MTCA cleanup investigations can be found in Washington Administrative Code (WAC), Section 173-340-600.

These opportunities form the basis for the public participation process. The intent of this plan is to provide complete and current information to all interested parties, to let you know when there are opportunities to provide input, to listen to concerns, and to address those concerns.

### ***Part of the Puget Sound Initiative***

JELD-WEN is one of a number of sites in the Everett area and is part of a larger cleanup effort, called the Puget Sound Initiative (PSI). Governor Chris Gregoire and the Washington State Legislature authorized the PSI as a regional approach to protect and restore Puget Sound. The PSI includes cleaning up 50-60 contaminated sites within one-half mile of the Sound. These sites are grouped in several bays around the Sound for “baywide” cleanup efforts. As other sites in the Everett baywide area move forward into investigation and cleanup, information about them will be provided to the community as well as to interested people and groups.

### ***Roles and Responsibilities***

Ecology will lead public involvement activities, with support from JELD-WEN. Ecology maintains overall responsibility and approval authority for the activities outlined in this plan. Ecology and JELD-WEN are both responsible for cleanup at this site. JELD-WEN will conduct, and Ecology will oversee, all cleanup activities. Ecology will ultimately ensure that contamination on this site is reduced to concentrations that are established in state regulations and that protect human health and the environment, known as cleanup levels.

### ***Organization of this Public Participation Plan***

The sections that follow in this plan provide:

- Section 2: Background information about the JELD-WEN site;
- Section 3: An overview of the local community that this plan is intended to engage; and
- Section 4: Detailed public involvement opportunities in this cleanup.

This PPP addresses current conditions at the site, but it is intended to be a dynamic working document that will be reviewed at each phase of the cleanup, and updated as needed. Ecology and JELD-WEN urge the public to become involved in the cleanup process.

## 2.0: Site Background

### *Site Description and Location*

The JELD-WEN site is located at 300 West Marine View Drive in Everett, Snohomish County, Washington. It is west of the Legion Memorial Golf Course and the American Legion Memorial Park (see Figure 1). The site is rectangular in shape, and approximately 47 acres in size. It is bounded by vacant industrial property (the Baywood property) to the north, Maulsby Mudflats to the south, Burlington Northern Railroad and West Marine View Drive to the east, and Port Gardner Bay to the west. The site is located in the vicinity of where the Snohomish River flows into Port Gardner Bay.



Figure 1: The JELD-WEN site is shown in the above map with a star, located at 300 W. Marine View Drive, in Everett, WA.

The City of Everett Comprehensive Plan land use map<sup>2</sup> indicates that the site is zoned industrial, for maritime services. Zoning to the east includes a small agricultural area, and residential single-family homes. Zoning to the west includes open water and parks (Jetty Island). The site is not located within the Everett Smelter area of historic arsenic contamination.

## ***General Site History and Contaminants***

The JELD-WEN site was a wooden door plant (Nord Door) prior to its closure in 2005. The property also had a machine shop, where parts were manufactured. Prior to construction of the wooden door plant, a portion of the property near West Marine View Drive was historically used as a pole treating facility. Chemicals formerly used on the site include petroleum products such as fuel oil, diesel and gasoline, toluene, parts cleaning solvents, thinners, polychlorinated biphenyls (PCBs), glues, and pentachlorophenol (a wood preserving fungicide also known as PCP). Additionally, creosote was used in the pole-treating operation. Contaminants from these activities may be present in site soil and water.

In 2006, JELD-WEN conducted soil and groundwater investigations on the site, and found the following contaminants at concentrations above MTCA cleanup levels:

- Petroleum compounds- in soil and groundwater
- Polynuclear aromatic hydrocarbons (PAHs), also known as creosote – in soil and groundwater
- Toluene - in soil and groundwater, and
- Benzene - in groundwater.

Further investigation will be done to fully characterize the contamination at the JELD-WEN site.

## ***The Cleanup Process***

Washington State's cleanup process and key opportunities for you to provide input are outlined in Figure 2. The general cleanup process includes the following steps:

- Remedial investigation (RI) - investigates the site for types, locations, and amounts of contaminants;
- Feasibility study (FS) - identifies cleanup options for those contaminants; and
- Cleanup action plan (CAP) – selects the preferred cleanup option and explains how cleanup will be conducted.

At any time during the cleanup process, an interim action may be conducted. An interim action partially addresses cleanup at the site and is usually followed by site-wide cleanup.

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<sup>2</sup> Planning and Community Development, City of Everett, WA  
[http://www.everettwa.org/Get\\_PDF.aspx?pdfID=339](http://www.everettwa.org/Get_PDF.aspx?pdfID=339) (Accessed September 14, 2007)



Each of these steps will be documented in reports and plans that will be available for public review. Public comment periods of at least 30 calendar days are usually conducted for the following documents:

- Draft remedial investigation report;
- Draft feasibility study report; and
- Draft cleanup action plan.

These cleanup steps and documents are described in greater detail in the following subsections.

### ***Interim Actions***

Interim actions may be conducted during the cleanup if required by Ecology. An interim action partially addresses the cleanup of a site, and may be required if:

- It is technically necessary to reduce a significant threat to human health or the environment.
- It corrects a problem that may become substantially worse or cost substantially more to fix if delayed.
- It is needed to complete another cleanup activity, such as design of a cleanup plan.

Interim actions are not currently anticipated on the JELD-WEN site.

### ***Remedial Investigation/Feasibility Study Report***

JELD-WEN and Ecology have agreed to conduct a remedial investigation (RI) on the site. The RI determines which contaminants are on the site, where they are located, and whether there is a significant threat to human health or the environment. The draft RI report provides baseline data about environmental conditions that will be used to develop cleanup options. The feasibility study (FS) and report then identify and evaluate cleanup options, in preparation for the next step in the process.

The RI and FS processes typically include several phases:

- Scoping;
- Site characterization;
- Development and screening of cleanup alternatives;
- Treatability investigations (if necessary to support decisions); and
- Detailed analysis.

The RI and FS reports are expected to be combined into a draft JELD-WEN RI/FS report. The draft report will be made available for public review and comment. Comments will be considered as the draft cleanup action plan (CAP) is prepared.

## ***Cleanup Action Plan***

JELD-WEN and Ecology have agreed to develop a CAP for the site. After public comment on the draft RI/FS report, a preferred cleanup alternative will be selected. The draft CAP explains the cleanup standards that will be applied at the site, selects the preferred cleanup alternative(s), and outlines the work to be performed during the actual site remediation. The CAP may also evaluate the completeness and effectiveness of any interim actions that were performed on the site. The draft CAP will be available for public review and comment. Once public comments are reviewed and any changes are made, Ecology provides final approval and site cleanup can begin.

## **3.0: Community Profile**

### ***Community Profile***

Everett is Snohomish County's largest city and the sixth largest city in the State of Washington. The current population of Everett is approximately 98,000 people<sup>3</sup> situated within 47.7 square miles. Located on Port Gardner Bay, Everett hosts the West Coast's second largest marina, U.S. Navy Homeport Naval Station Everett, and The Boeing Company's assembly plant. The city's 2006 labor workforce was more than 80,000, predominantly employed in technology, aerospace, and service-based industries.<sup>4</sup>

### ***Key Community Concerns***

An important part of the Public Participation Plan is to identify key community concerns for each cleanup site. The JELD-WEN site is industrial, but located near a residential area. The proximity of the community to the site is likely to raise concerns about how daily life and the future of the community will be affected during and after cleanup of the site.

Many factors may contribute to concerns, such as the amount of contamination, how the contamination will be cleaned up, or future use of the site. Community concerns often change over time, as new information is learned and questions are answered. Identifying site-specific community concerns at each stage of the cleanup process is helpful to ensure that they are adequately addressed. On-going key community concerns will be identified for the JELD-WEN site through public comments and other opportunities as detailed in Section 4.

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<sup>3</sup> US Census Bureau, City & Towns Estimates Data for July 1, 2006.  
<http://www.census.gov/popest/estimates.php> (Accessed September 12, 2007)

<sup>4</sup> City of Everett. <http://www.everettwa.org/default.aspx?ID=314> (Accessed September 12, 2007)

## 4.0: Public Participation Opportunities

Ecology and JELD-WEN invite you to share your comments and participate in the cleanup in your community. As we work to meet our goals, we will evaluate whether this public participation process is successful. This section describes the public participation opportunities for this site.

### *Measuring Success*

We want this public participation process to succeed in its goals. Success can be measured, at least in part, in the following ways:

- Number of written comments submitted that reflect understanding of the cleanup process and the site;
- Direct “in-person” feedback about the site cleanup or public participation processes, if public meetings are held; and
- Periodic updates to this plan to reflect community concerns and responses.

If we are successful, this process will increase:

- Community awareness about plans for cleanup and opportunities for public involvement;
- Public participation throughout the cleanup; and
- Community understanding regarding how their input will be considered in the decision-making process.

### *Activities and Information Sources*

#### **Ecology Contacts**

Ecology is the lead contact for questions about the cleanup in your community. The Ecology staff identified in this section are familiar with the cleanup process and activities at the site. For more information about public involvement or about technical aspects of the cleanup, please contact:

#### For technical questions

or comments:

Isaac Standen  
Ecology Project Coordinator  
WA State Dept. of Ecology  
Toxics Cleanup Program  
P.O. Box 47600  
Olympia, WA 98504-7600  
Phone: (360) 407-6776  
E-mail: [ista461@ecy.wa.gov](mailto:ista461@ecy.wa.gov)

#### For public involvement

questions or comments:

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## **Ecology's Webpage**

Ecology has created a webpage to provide convenient access to information. Documents such as the Agreed Order, draft reports, and cleanup plans, are posted as they are issued during the investigation and cleanup process. Visitors to the webpage can find out about public comment periods and meetings; download, print, and read information; and submit comments via e-mail. The webpage also provides links to detailed information about the MTCA cleanup process. The JELD-WEN site webpage is available at the following address: [http://www.ecy.wa.gov/programs/tcp/sites/jeld\\_wen\\_everett/jeld\\_everett\\_hp.htm](http://www.ecy.wa.gov/programs/tcp/sites/jeld_wen_everett/jeld_everett_hp.htm)

## **Information Centers/Document Repositories**

The most comprehensive source of information about the JELD-WEN site is the information center, or document repository. Two repositories provide access to the complete list of site-related documents. All JELD-WEN investigation and cleanup activity reports will be kept in print at those two locations and will be available for your review. They can be requested on CD as well. Document repositories are updated before public comment periods to include the relevant documents for review. Documents remain at the repositories throughout the investigation and cleanup. For the JELD-WEN site, the document repositories and their hours are:

- **Everett Public Library**  
2702 Hoyt Ave.  
Phone: (425) 257-8010  
Hours: Mon.-Wed. 10 a.m.-9 p.m., Thurs.-Sat. 10 a.m.-6 p.m., Sun. 1-5 p.m.
- **WA Department of Ecology Headquarters**  
300 Desmond Dr.  
Lacey, WA 98504-7600  
By appointment. Please contact Carol Dorn at (360) 407-7224 or [cdor461@ecy.wa.gov](mailto:cdor461@ecy.wa.gov).

## **Public Comment Periods**

Public comment periods provide opportunities for you to review and comment on major documents, such as the Agreed Order, the draft RI/FS report, and the draft CAP. The typical public comment period is 30 calendar days.

### *Notice of Public Comment Periods*

Notices for each public comment opportunity will be provided by local newspaper and by mail. These notices indicate the timeframe and subject of the comment period, and

explain how you can submit your comments. For the JELD-WEN site, newspaper notices will be posted in The Daily Herald.

Notices are also sent by regular mail to the local community and interested parties. The community typically includes all residential and business addresses within one-quarter mile of the site, as well as potentially interested parties such as public health entities, environmental groups, and business associations.

### *Fact Sheets*

One common format for public comment notification is the fact sheet. Like the newspaper notice, fact sheets explain the timeframe and purpose of the comment period, but also provide background and a summary of the document under review. One fact sheet has been prepared for the JELD-WEN site explaining the Agreed Order and this Public Participation Plan (See Appendix A). Future fact sheets will be prepared at key milestones in the cleanup process.

## **MTCA Site Register**

Ecology produces an electronic newsletter called the MTCA Site Register. This semi-monthly publication provides updates of the cleanup activities occurring throughout the state, including public meeting dates, public comment periods, and cleanup-related reports. Individuals who would like to receive the MTCA Site Register can sign up three ways:

- Call (360) 407-6069
- Send an email request to [ltho461@ecy.wa.gov](mailto:ltho461@ecy.wa.gov) or
- Register on-line at [http://www.ecy.wa.gov/programs/tcp/pub\\_inv/pub\\_inv2.html](http://www.ecy.wa.gov/programs/tcp/pub_inv/pub_inv2.html)

## **Mailing Lists**

Ecology maintains both an e-mail and regular mail distribution list throughout the cleanup process. The list is created from carrier route delineations for addresses within one-quarter mile of the site, potentially interested parties, public meeting sign-in sheets, and requests made in person, or by regular mail or e-mail. You may request to be on the mailing list by contacting Ecology's public involvement staff person listed earlier in this section.

## **Optional Public Meetings**

A public meeting will be held during a comment period if requested by ten or more people, or if Ecology decides it would be useful. Public meetings provide additional opportunity to learn about the investigation or cleanup, and to enhance informed

comment. If you are interested in a public meeting about the JELD-WEN site, please contact the Ecology staff listed earlier in this section.

## **Submitting Comments**

You may submit comments by regular mail or e-mail during public comment periods to the Ecology Project Manager and technical staff person listed earlier in this section.

## **Response to Comments**

Ecology will review all comments submitted during public comment periods, and will modify documents as necessary. You will receive notice by regular mail or e-mail that Ecology has received your comments, along with a general explanation about how the comments were addressed, and where the revised document can be found.

## **Other**

Ecology and JELD-WEN are committed to the public participation process and will consider additional means for delivering information and receiving comments.

## ***Notification to Neighborhood Organizations***

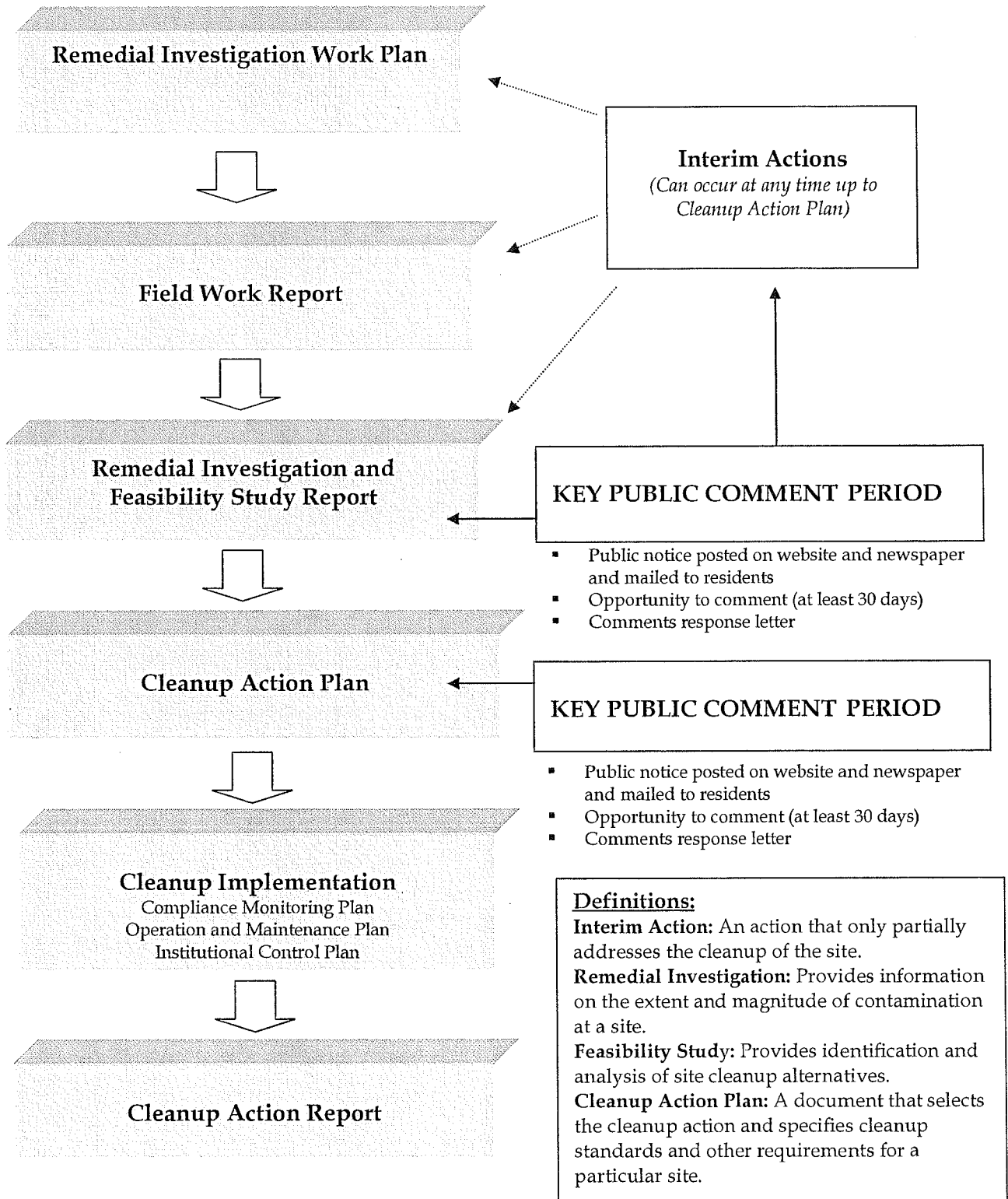
In addition to notification about cleanup activities, special notification to the community is triggered if JELD-WEN chooses to take land use actions. Local neighborhood organizations will be notified by telephone or by e-mail within one week of occurrence or confirmation of the following:

- Notification of the intent to transfer properties;
- Notification of public comment periods for development actions that will trigger State Environmental Policy Act (SEPA) and permitting requirements. All major documents will be submitted to the official document repositories; and
- Notification and stop work for any activities performed on the site that are not allowable under the restrictive covenant for the site.

## ***Public Participation Grants***

You are eligible to apply for a Public Participation Grant from Ecology to provide additional public participation activities. Those additional activities will not reduce the scope of the activities defined by this plan. Activities conducted under this plan would coordinate with the additional activities defined under the grant.

**Figure 2: Washington State Cleanup Process**





## Glossary

**Cleanup:** The implementation of a cleanup action or interim action.

**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 that selects the cleanup action and specifies cleanup standards and other requirements for a particular site. The cleanup action plan, which follows the remedial investigation/feasibility study report, is subject to a public comment period. After completion of a comment period on the cleanup action plan, Ecology finalizes the cleanup action plan.

**Cleanup Level:** The concentration (or amount) of a hazardous substance in soil, water, air, or sediment that protects human health and the environment under specified exposure conditions. Cleanup levels are part of a uniform standard established in state regulations, such as MTCA.

**Cleanup Process:** The process for identifying, investigating, and cleaning up hazardous waste sites.

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

**Feasibility Study:** Provides identification and analysis of site cleanup alternatives and is usually completed within a year. The entire Remedial Investigation/Feasibility Study process takes about two years and is followed by the cleanup action plan. Remedial action evaluating sufficient site information to enable the selection of a cleanup action plan.

**Hazardous Site List:** A list of ranked sites that require further remedial action. These sites are published in the Site Register.

**Interim Action:** Any remedial action that partially addresses the cleanup of a site. It is an action that is technically necessary to reduce a threat to human health or the environment by eliminating or substantially reducing one or more pathways for exposure to a hazardous substance at a facility; an action that corrects a problem that may become substantially worse or cost substantially more to address if the action is delayed; an action needed to provide for completion of a site hazard assessment, state remedial investigation/feasibility study, or design of a cleanup action.

**Model Toxics Control Act:** Refers to RCW 70.105D. Voters approved it in November 1988. The implementing regulation is WAC 173-340 and was amended in 2001.

**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 the 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 conducted in order to determine the risk or potential risk to human health.

**Remedial Investigation:** Any remedial action that provides information on the extent and magnitude of contamination at a site. This usually takes 12 to 18 months and is followed by the feasibility study. The purpose of the Remedial Investigation/Feasibility Study is to collect and develop sufficient site information to enable the selection of a cleanup action.