

## **Site Cleanup:**

### **BLAINE MINI MART SITE**

2530 Peace Portal Drive  
Blaine, Washington 98230-9782

## **PUBLIC PARTICIPATION PLAN**

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### **Prepared by:**

Washington State Department of Ecology



**Revised November 2010**

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

This public participation plan is prepared for the Blaine Mini Mart Site cleanup as part of the requirements 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 Yon Kim will support public involvement throughout the cleanup. The plan is intended to encourage coordinated and effective public involvement tailored to the community's needs around Blaine Mini Mart.

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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 cleanup of a site in Blaine, the Blaine Mini Mart Site. These opportunities are part of a cooperative agreement between the Washington State Department of Ecology (Ecology) and Yon Kim. The legal document in which Yon Kim and Ecology agreed to decide on cleanup actions for the Blaine Mini Mart Site is called the Agreed Order. Blaine Mini Mart is located at 2530 Peace Portal Drive Blaine, Washington.

Cleanup actions and the public participation process that helps guide them are established in Washington's Model Toxics Control Act (MTCA).<sup>1</sup> Under MTCA, Ecology is responsible for providing timely information and meaningful chances 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.
- 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 an 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.
- Considering public comments received during public comment periods.

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<sup>1</sup> The Model Toxics Control Act (MTCA) is the contaminated site 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.

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 more public involvement opportunities are appropriate.

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.
- Let you know when there are opportunities to provide input.
- Listen to concerns.
- Address those concerns.

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

Blaine Mini Mart is one of a number of sites in the Blaine 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 Blaine 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 leads all public involvement activities, with support from Yon Kim. Ecology maintains overall responsibility and approval authority for the activities outlined in this plan. Yon Kim is responsible for cleanup at this Site. Ecology ultimately will oversee all cleanup activities, and ensure that contamination on this Site is cleaned up to concentrations that are established in state regulations and that protect human health and the environment.

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

The sections that follow in this plan provide:

- Section 2: Background information about the Blaine Mini Mart Site.
- Section 3: An overview of the local community that this plan is intended to engage.
- Section 4: Public involvement opportunities in this cleanup.

This Public Participation Plan 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 Yon Kim urge the public to become involved in the cleanup process.

## 2.0: Site Background

### *Site Description and Location*

The Blaine Mini Mart Site is located at 2530 Peace Portal Drive Blaine, Whatcom County, Washington (Figure 1). The Site is situated in a mixed commercial/residential area and consists of a half acre parcel. The Site is bounded to the north by a vacant parcel covered with grasses, shrubs, and small trees, with single family residence and a barn located farther to the north. Peace Portal Drive forms the southern boundary of the Site, with railroad tracks and a field vegetated with grasses further to the south. A vacant building and associated unpaved parking lot are present east of the Site, with an Interstate-5 exit / on-ramp 274 further to the east. Bell Road and its intersection with Peace Portal Drive form the western boundary of the Site.

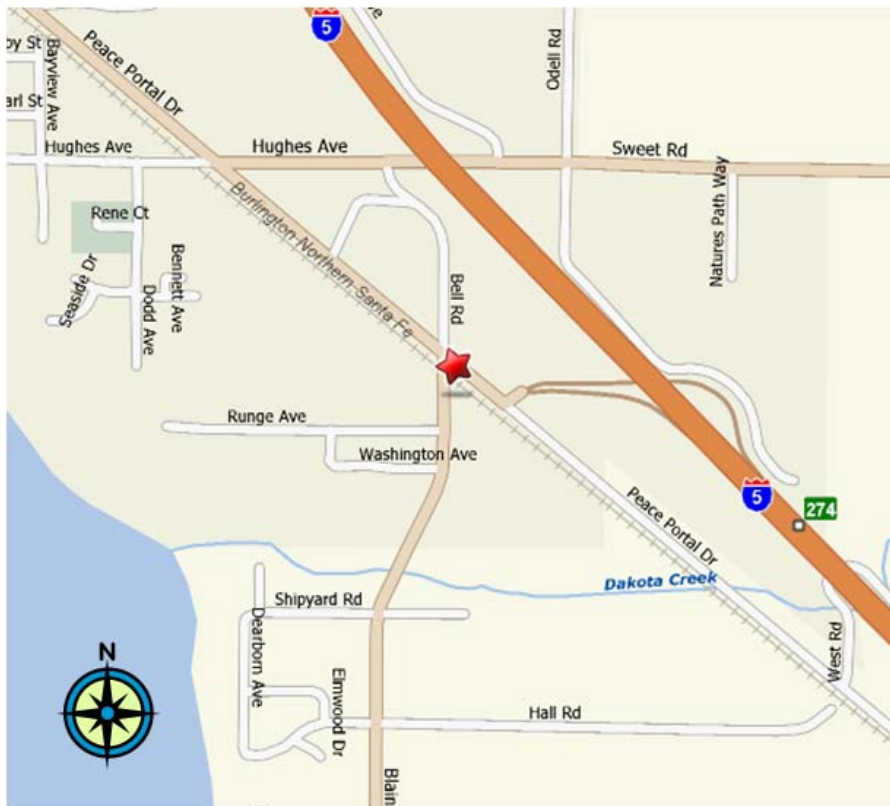


Figure 1: The Blaine Mini Mart Site is shown in the above map with a star, located at 2530 Peace Portal Drive Blaine, WA.

### *General Site History and Contaminants*

The Blaine Mini Mart Site is a gas station. Chemicals formerly used on the Site include gasoline, benzene, toluene, ethylbenzene, xylenes (four compounds often found in

petroleum products, sometimes called BTEX), gasoline, and MTBE (a gasoline additive). Contaminants from these activities are present in Site soil and groundwater.

Yon Kim conducted soil and groundwater investigations on the Site and found the following contaminants at concentrations above MTCA cleanup levels:

- Gasoline, benzene, and MTBE in soil
- Gasoline, BTEX, MTBE, diesel, and heavy oil range petroleum hydrocarbons in groundwater

Further investigation was done to fully characterize contamination at the Blaine Mini Mart Site, and is described in the following sections.

## ***The Cleanup Process***

Washington State's cleanup process and key chances for you to provide input are outlined in Figure 2 at the end of this plan. In general, the cleanup process includes the following steps:

- Remedial Investigation (RI) or Site Characterization - investigates the site for types, locations, and amounts of contaminants.
- Feasibility Study (FS) - identifies cleanup options for those contaminants.
- Cleanup Action Plan (CAP) – selects the preferred cleanup option and explains how cleanup will be conducted.

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:

- Site Characterization report
- FS report
- Draft CAP

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

## ***Remedial Investigation/Site Characterization***

The RI or Site Characterization determines which contaminants are on the Site, where they are located, and whether there is a significant threat to human health or the environment. A Site Characterization study was selected for this Site because the Site was small enough to do so. The Site Characterization report is then used to develop cleanup options in the FS report.



A Site Characterization Report was prepared in July 2010. Sampling results found contaminant concentrations above MTCA Method A cleanup levels at the following locations (Figure 3):

- Benzene, gasoline, heavy oil, and MBTE were found in soil at depths ranging from the surface to 19 feet below ground. This contamination is located around the fuel dispenser island.
- BTEX, gasoline, diesel, MTBE, and 1,2 dichloroethane (also called EDC or ethylene dichloride) each were found in at least one of four groundwater monitoring wells. One well, north-east of the fuel island, did not have any sample concentrations above MTCA Method A cleanup levels.

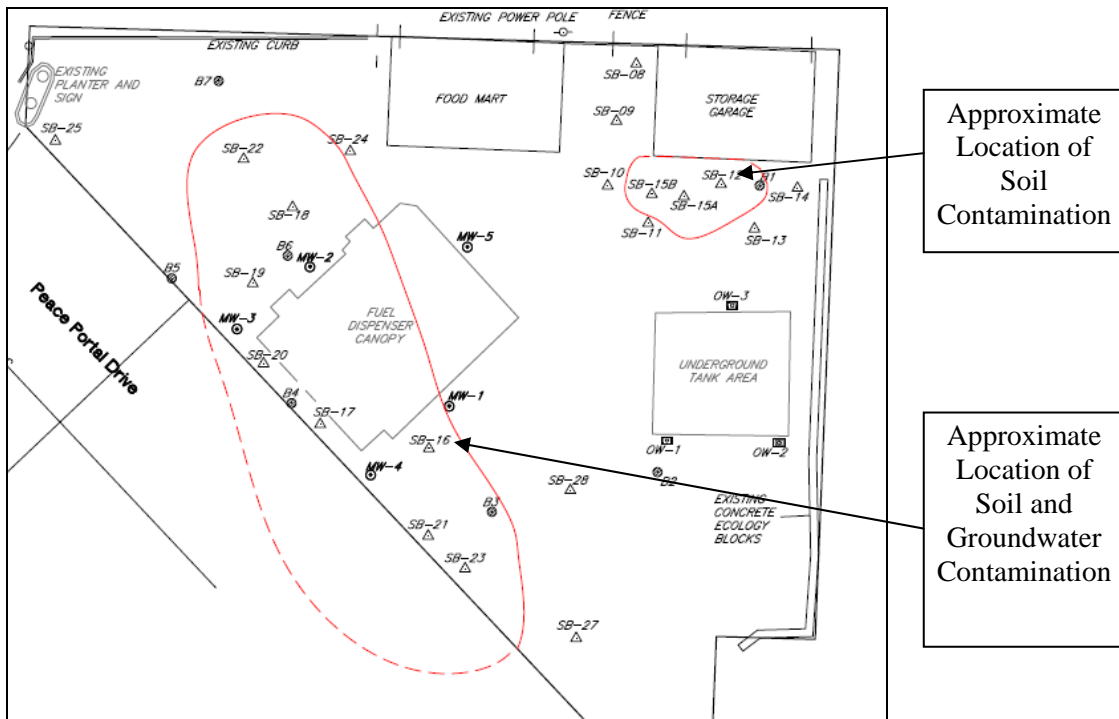


Figure 3: Approximate locations of soil and groundwater contamination at the Blaine Mini Mart Site

## ***Feasibility Study Report***

The FS report identifies and evaluates cleanup options, in preparation for the next step in the process. A Focused Feasibility Study (FFS) was selected for this Site in order to accelerate the cleanup, because few cleanup options are possible for the Blaine Mini Mart Site.

The FFS report was prepared in August 2010. The report describes *exposure pathways*, or how contaminants move through soil, groundwater, and air on the Site and how human health and the environment may be affected. Information about the amount and location of contaminants and exposure pathways is used to identify *cleanup action alternatives*. Cleanup action alternatives are the options that will successfully achieve cleanup of the Site. Alternatives may surround pollution, remove pollution, or include institutional control such as fencing, and they may be used in combination. Two alternatives were identified and evaluated (based on established criteria) to eliminate risk at the Site.

Alternative 1 was selected for this Site, and will include the following measures:

- Remove fuel dispenser islands and other structures
- Excavate contaminated soil
- Treat contaminated soil offsite with heat and reuse onsite
- Treat groundwater with oxygen release compound (ORC) to increase the breakdown of petroleum
- Initiate groundwater monitoring and institutional controls

Alternative 1 is protective of human health and the environment, is a permanent solution that can be completed in a reasonable time frame, addresses current public concerns, and is compatible with future land uses at the Site.

## ***Cleanup Action Plan***

Yon Kim and Ecology agreed to develop a draft CAP for the Site. The draft CAP was prepared in September 2010 to explain the cleanup action alternative identified in the FFS report. The CAP presents the following cleanup schedule:

- Remove structures: March 2011
- Excavate contaminated soil, reuse, and regrade Site: March-April 2011
- Install groundwater monitoring wells: April-May 2011
- Begin groundwater monitoring: April-May 2011
- Conclude groundwater monitoring: January-February 2012

Institutional controls during the cleanup will include fencing, locks and signs to protect the public and prevent tampering with monitoring equipment. After the cleanup, controls will be identified in a Soil Management Plan. The Plan will ensure that both Ecology and the Blaine Mini Mart property owner approve any future soil excavation in the City right-of-way. This will protect City workers and utility maintenance workers from encountering any potential remaining contamination.

### ***State Environmental Policy Act Checklist and Determination of Non-Significance***

In addition to the Site cleanup documents, Ecology has also prepared a State Environmental Policy Act (SEPA) checklist for the cleanup alternative. SEPA is intended to make sure that environmental values are considered during agency decision-making. A SEPA checklist was prepared for the Site to identify any potential environmental impacts of the project on the surrounding environment. The results of the checklist identify whether these impacts could be significant, that is, reasonably likely to have more than a moderate negative impact on the environment. Ecology reviewed the checklist and determined that the actions were not likely to have significant negative impacts (a Determination of Non-Significance). The checklist and determination are both available for public comment.

## **3.0: Community Profile**

### ***Community Profile***

Blaine is located in the northwest corner of Washington at the Canadian border. It is 35 miles south of Vancouver, British Columbia, and 110 miles north of Seattle. Blaine is situated on the banks of Drayton Harbor to the west and is 25 miles east of the foothills of the Cascade Mountain Range. The City of Blaine contains about 3.3 square miles of land. The city has marinas located near downtown and on the Semiahmoo Spit. The population of Blaine was 3,770 people as of a census taken in the year 2000.

Much of Blaine's economy is based on trade across the Canadian border. The eastern side of the city accommodates a number of import/export warehouses, freight and courier services and gas stations serving long haul cargo trucks. The Customs and Border Protection branch of the Department of Homeland Security operates two border inspection stations in Blaine. Blaine also includes a number of manufacturing companies.

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

An important part of the Public Participation Plan is to identify key community concerns for each cleanup site. The Blaine Mini Mart Site is zoned as Highway Commercial subzone A industrial, but is located near residential and planned commercial areas. The proximity of the community to the Site is likely to raise questions about how daily life and the future of the community may be affected during and after cleanup of the Site.

Many factors are likely to contribute to community questions, 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 will be helpful to ensure that they are adequately addressed. On-going key community concerns will be identified for the Blaine Mini Mart Site through public comments and other opportunities as outlined in Section 4.

## **4.0: Public Participation Opportunities**

Ecology and Yon Kim 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. 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.
- 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.
- 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 person identified in this section is familiar with the cleanup process and activities at the Site. For more information about public involvement or the technical aspects of the cleanup, please contact:

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

## Ecology's Webpage

Ecology has created a webpage to provide convenient access to information. Documents such as the Agreed Order, draft reports, cleanup plans, and SEPA documents 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 Blaine Mini Mart Site webpage is available at the following address:

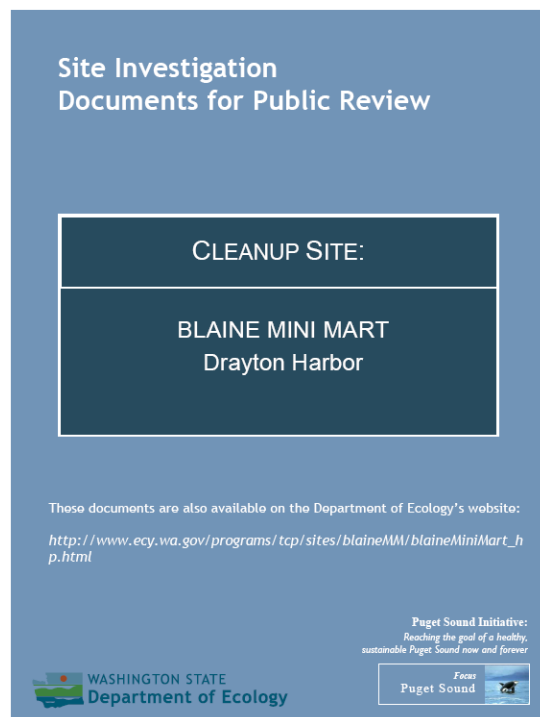
[http://www.ecy.wa.gov/programs/tcp/sites/blaineMM/blaineMiniMart\\_hp.html](http://www.ecy.wa.gov/programs/tcp/sites/blaineMM/blaineMiniMart_hp.html)

## Information Centers/Document Repositories

The most comprehensive source of information about the Blaine Mini Mart Site is the information center, or document repository. Two repositories, located at the Washington State Department of Ecology Headquarters and the Blaine Public Library, provide access to the complete list of site-related documents. All Blaine Mini Mart 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 compact disk (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 Blaine Mini Mart Site, the document repositories' addresses and their hours are:

- **Blaine Public Library**  
610 3<sup>rd</sup> Street  
Blaine, WA 98230  
Phone: (360) 332-8146  
Hours:  
Monday through Thursday; 10 a.m. to 8 p.m.  
Friday and Saturday; 10 a.m. to 6 p.m.
- **WA Department of Ecology Headquarters**  
300 Desmond Dr. SE  
Lacey, WA 98503  
By appointment. Please contact Carol Dorn at  
(360) 407-7224 or [cesg461@ecy.wa.gov](mailto:cesg461@ecy.wa.gov).

Look for document covers much like the illustration at right.



## **Public Comment Periods**

Public comment periods provide opportunities for you to review and comment on major documents such as the Agreed Order, Public Participation Plan, Site Characterization Report, Focused Feasibility Report, and the draft CAP. The typical public comment period is 30 calendar days.

### *Notice of Public Comment Periods*

Notices for each public comment period 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 Blaine Mini Mart Site, newspaper notices will be posted in The Northern Light and Bellingham Herald.

Notices are also sent by regular mail to the local community and interested parties. Members of the local community that typically receive these notices include all residential and business addresses within one-quarter mile of the site. Interested parties could include 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 Blaine Mini Mart Site that explains 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)
- 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 Site Manager 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 opportunities to learn about the investigation or cleanup, and to enhance informed comment. If you are interested in a public meeting about the Blaine Mini Mart 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 Site Manager 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 an explanation about how the comments were addressed.

## **Other**

Ecology and Yon Kim are committed to the public participation process and will consider additional means for delivering information and receiving comments, including combining public comment periods for other actions (such as those associated with the State Environmental Policy Act).

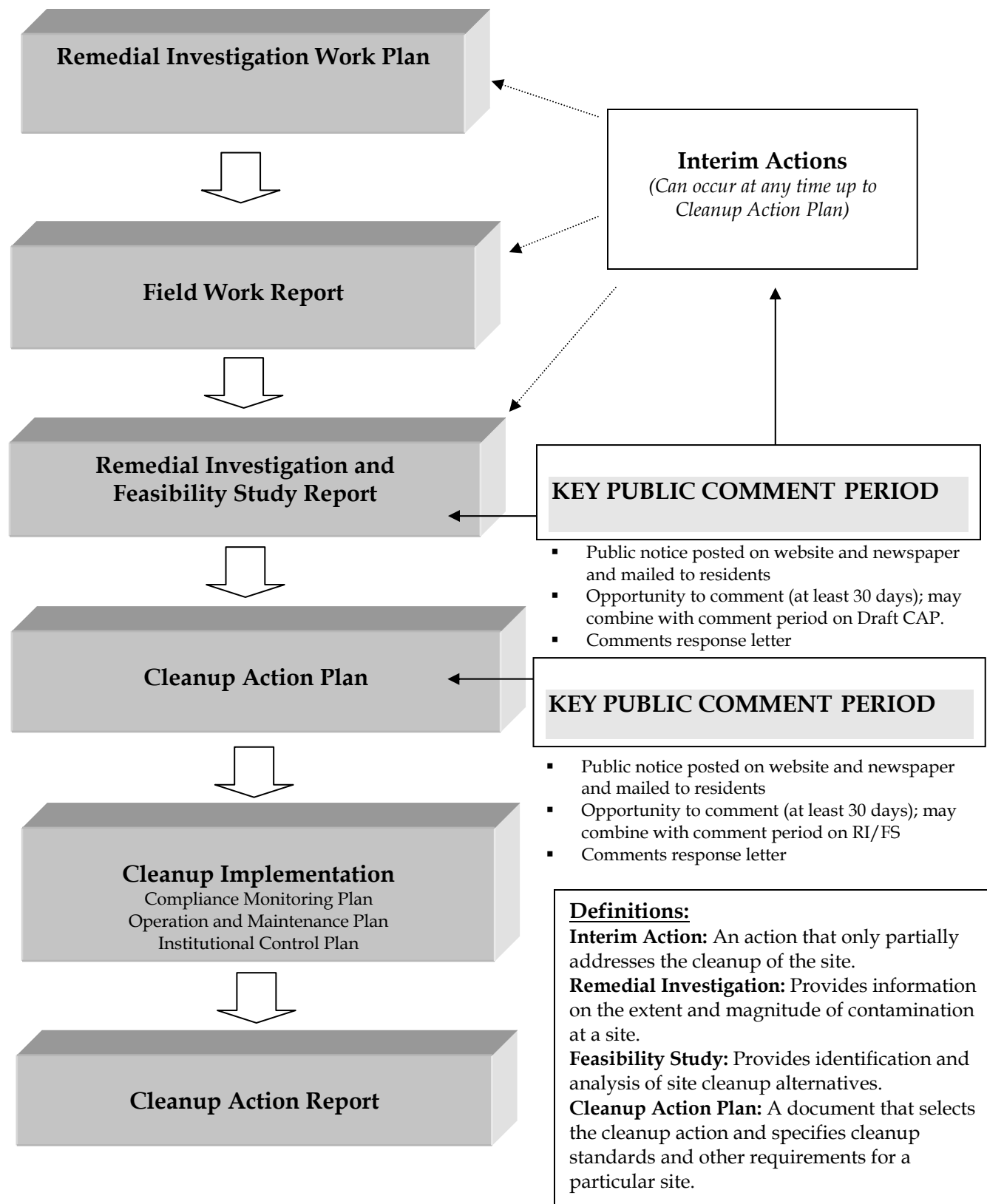
## ***Public Participation Grants***

You may be 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 MTCA cleanup requirements, including but not limited to: compliance with cleanup standards; utilizing permanent solutions to the maximum extent practicable; and including 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 Chapter 70.105D RCW. Voters approved it in November 1988. The implementing regulation is found in Chapter 173-340 WAC.

**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 or expenditure consistent with MTCA 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.