



DRAFT PUBLIC PARTICIPATION PLAN
CHS AUBURN SITE
AUBURN, WASHINGTON

Prepared by
Washington State Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008-5452

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INTRODUCTION

The Washington State Department of Ecology (Ecology) has prepared this public participation plan in cooperation with CHS Inc. (CHS), pursuant to the Model Toxics Control Act (MTCA) and Agreed Order 4033, to promote meaningful community involvement during the investigation and cleanup at the CHS facility in Auburn, Washington. This plan outlines and describes the tools that Ecology uses to inform the public about site activities and identifies opportunities for the community to become involved.

Ecology and CHS have negotiated a legal agreement called an Agreed Order that formally describes their working relationship and outlines the scope of work. The Agreed Order requires that CHS Auburn complete a Remedial Investigation (RI) to determine the nature and extent of contamination in this area. It also requires that a Feasibility Study (FS) be completed to evaluate cleanup options.

LOCATION AND SITE BACKGROUND

CHS Auburn is located at 238 8th Street SE Auburn, Washington. From approximately 1920 to 1985, the Valley Supply Co-op operated a gasoline distribution business at this site. Cenex (CHS's predecessor) purchased the facility from Valley Supply in 1985. Cenex and later CHS continued business operations at the site, including bulk and retail sales and operation of above- and under-ground bulk and retail petroleum storage tanks.

In May 1994, a small crack in a gasoline pipe was discovered adjacent to the aboveground tanks at the CHS facility. The pipe was repaired and tests were conducted that indicated that a gasoline (with traces of diesel) release occurred and that soil and groundwater were contaminated. Contamination was also found in soil and groundwater on City of Auburn property and on several other properties in the immediate area, extending from the property approximately 0.5 miles to the northeast. At the time of the identification of the contamination, Cenex worked with community leaders and property owners to ensure the public was involved in the cleanup efforts and had access to information about the cleanup process.

The amount and duration of the gasoline release at the property are not known. Cenex's low estimate was 400 gallons, based on inventory control analysis. Ecology's high estimate at the time was over 12,000 gallons, based on the amount of gasoline floating on the groundwater and on mathematical models that assume certain soil conditions that may not apply at the site.

CHS believes that some contamination likely was present at the site at the time that they purchased it. Historic practices in the gasoline supply industry would likely support that claim. Other potential sources of contamination are known to have existed in the vicinity of the site in the past.

Overview of Previous Cleanup Work

Ecology and Cenex entered into an Emergency Agreed Order in November 1994. In August 1994, Cenex installed several recovery wells to remove the gasoline from the groundwater. Approximately 13,500 product-equivalent gallons of petroleum hydrocarbon has been recovered through a pump-and-treat system and two Air Sparge/Soil Vapor Extraction (AS/SVE) systems. No free petroleum has been observed at the site for nearly 5 years. Residual petroleum contamination in the soil continues to provide the source of contamination to the groundwater.

In 1997 and 1998, Cenex excavated much of their property in association with building renovation activities. As this work progressed, several leaking underground storage tanks and an abandoned oil-water separator were discovered and removed along with over 8,000 cubic yards of contaminated soils.

Groundwater pump-and-treat and free product recovery ended in 1997, the Soil Vapor Extraction systems operations were phased out in 1999, and the Air Sparging systems continue to operate.

Contaminants of Concern

A release of petroleum hydrocarbon occurred at this site. As a result, soil and groundwater investigations to date have indicated high levels of the following contaminants:

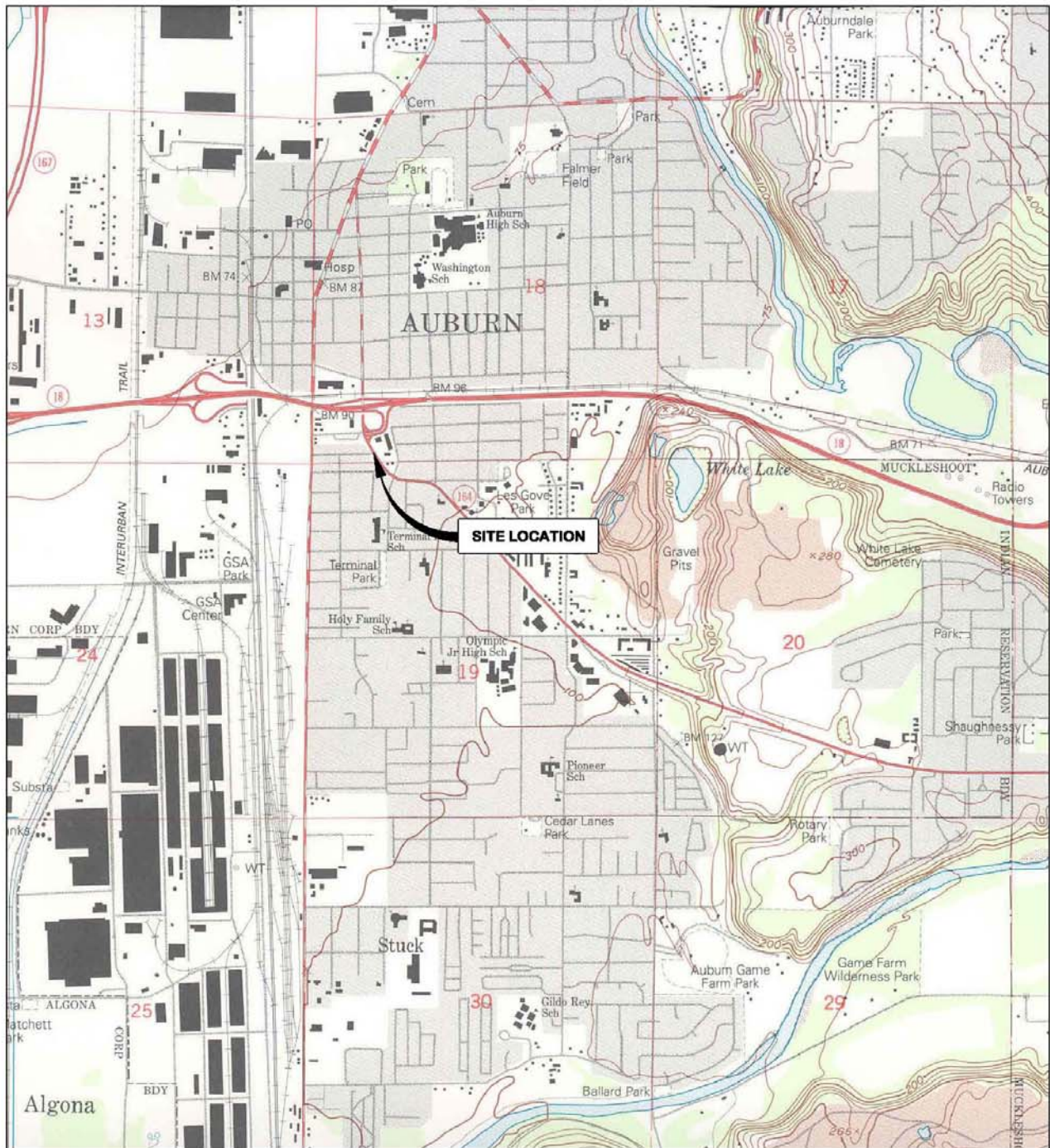
- Petroleum hydrocarbon as gasoline
- Petroleum hydrocarbon as diesel
- Petroleum hydrocarbon as heavy oil
- Benzene/Toluene/Ethylbenzene/Xylenes

Current Activity

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

- Continue to operate and maintain the existing air sparging portion of systems to treat petroleum on groundwater in the vicinity of the site.
- Conduct a Remedial Investigation/ Feasibility Study that includes a Health and Safety Plan and a Sampling Analysis plan.
- Enter data into Ecology's Environmental Information System.

If adequate data is collected during the investigation, cleanup actions can then be selected and designed. However, if significant data gaps are identified, more work may be needed in order to select a final cleanup action plan



REFERENCE: 7.5 MINUTE USGS QUADRANGLE AUBURN, WASHINGTON. DATED 1949 AND PHOTOREVISED 1994



WASHINGTON



FARALLON CONSULTING

320 3rd Ave. NE
Issaquah, WA 98027

FIGURE 1

SITE VICINITY MAP
CHS AUBURN
238 8th STREET SE
AUBURN, WASHINGTON

FARALLON PN: 301-004

Drawn By: DEW

Checked By: ARM

Date: 8/25/06

Disk Reference: 3001004

Site Location Map

COMMUNITY PROFILE

The CHS Auburn site is located in the City of Auburn, Washington, a primarily suburban community located 20 miles south of Seattle. Nestled in a fertile river valley, Auburn has been both a farm community and a center of business and industry for more than 150 years.

The Seattle –Tacoma interurban railroad, along with better roads, caused many new companies to set up business in Auburn. In the 1990s, a large super-mall was built in the valley, enticing consumers from all over the Puget Sound region.

Auburn has made the transition from small farms to large industries, but much of the city's history remains.

KEY COMMUNITY CONCERNS

The City of Auburn maintains several municipal drinking water wells in the vicinity of the CHS Auburn site and is concerned about the potential impacts to their drinking water. No contamination to public drinking water sources has been found in the past 13 years of testing near the site.

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

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

PUBLIC PARTICIPATION ACTIVITIES AND RESPONSIBILITIES

The purpose of this Public Participation Plan is to promote public understanding and participation in the MTCA activities planned for this site. This section of the plan addresses how Ecology will share information and receive public comments and community input on the site activities.

Public Involvement Activities

Ecology uses a variety of activities to facilitate public participation in the investigation and cleanup of MTCA sites. Ecology will implement input provided by the community whenever possible. The following is a list of the public involvement activities that Ecology will use, their purposes, and descriptions of when and how they will be used during this site cleanup.

Formal Public Comment Periods

Comment periods are the primary method Ecology uses to get feedback from the public on proposed cleanup decisions. Comment periods usually last 30 days and are required at key points during the investigation and cleanup process before final decisions are made.

During a comment period, the public can comment in writing. Verbal comments are taken if a public hearing is held. After formal comment periods, Ecology reviews all comments received and may respond in a document called a Responsiveness Summary.

Ecology will consider the need for changes or revisions based on input from the public. If significant changes are made, then a second comment period may be held. If no significant changes are made, then the draft document(s) will be finalized.

Public comment periods will be held for draft remedial investigation/feasibility studies, for any draft cleanup action plans that are developed for the site, and for any future legal agreements regarding this site.

Public Meetings and Hearings

Public meetings may be held at key points during the investigation and cleanup process. 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 four repositories for CHS Auburn cleanup project.

- Auburn Public Library – 1102 Auburn Way South, Auburn, WA 98002
- Washington State Department of Ecology, 3190 160th Avenue SE, Bellevue, WA 98008, (425) 649-7190. Please call for an appointment.

Some site information also will be posted on Ecology's web site at http://www.ecy.wa.gov/programs/tcp/sites/sites_information.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.

Please contact **Justine Asohmbom at (425) 649-7135 or juas461@ecy.wa.gov** if you would like to be involved or have your address added to or deleted from this mailing list.

Fact Sheets

Ecology will mail fact sheets to persons and organizations interested in the CHS Auburn cleanup project 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 *Auburn Reporter*, *South County Journal*, *Seattle Times* and *Seattle Post Intelligencer* to announce public comment periods and public meetings or hearings for the site.

Plan Update

This public participation plan may be updated as the project proceeds. If an update is necessary, the revised plan will be submitted to the public for comment.

Points of Contact

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

Brian Sato, Site Manager

Washington State Department of Ecology

3190 160th Avenue SE

Bellevue, WA 98008

Tel: (425) 649-7265

Email: bsat461@ecy.wa.gov

Justine Asohmbom

Public Involvement Coordinator

Washington State Department of Ecology

3190 160th Avenue SE

Bellevue, WA 98008

Tel: (425) 649-7135

Email: juas461@ecy.wa.gov

Barbara J. Smith,

CHS Auburn Site - Public Outreach Coordinator

3820 S Ferdinand Street #202

Seattle, WA 98178

(206) 343-0250

Email: barbara@harrisandsmith.com

GLOSSARY

Agreed Order: A legal agreement between Ecology and a potentially liable person to conduct work toward a cleanup.

Cleanup: Actions taken to deal with a release, or threatened release of hazardous substances that could affect public health and/or the environment. The term "cleanup" is often used broadly to describe various response actions or phases of remedial responses such as the remedial investigation/feasibility study.

Cleanup Action Plan (CAP): A document that explains which cleanup alternative(s) will be used at sites for the cleanup. The cleanup action plan is based on information and technical analysis generated during the remedial investigation/feasibility study and consideration of public comments and community concerns.

Comment Period: A time period during which the public can review and comment on various documents and proposed actions. For example, a comment period may be provided to allow community members to review and comment on proposed cleanup action alternatives and proposed plans.

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

Feasibility Study: This study develops and evaluates cleanup options for a given site.

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

Information Repository: A file containing current information, technical reports, and reference documents available for public review. The information repository is usually located in a public building that is convenient for local residents such as a public school, city hall, or library.

Model Toxics Control Act (MTCA): Legislation passed by citizens of the State of Washington through an initiative in 1988. Its purpose is to identify, investigate, and clean up facilities where hazardous substances have been released. It defines the role of Ecology and encourages public involvement in the decision making process. MTCA regulations are administered by the Washington State Department of Ecology.

Potentially Liable Person: Any individual(s) or company(s) potentially responsible for, or contributing to, the contamination problems at a site. Whenever possible, Ecology requires these PLPs, through administrative and legal actions, to clean up sites.

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

Public Participation Plan: A plan prepared to encourage coordinated and effective public involvement designed to the public's needs at a particular site.

Remedial Investigation: This study characterizes the site and defines the extent of contamination.

Remedial Investigation/Feasibility Study: Two distinct but related studies. They are usually performed at the same time, and together referred to as the "RI/FS." They are intended to:

- Gather the data necessary to determine the type and extent of contamination;
- Establish criteria for cleaning up the site;
- Identify and screen cleanup alternatives for remedial action; and
- Analyze in detail the technology and costs of the alternatives.

Responsiveness Summary: A summary of oral and/or written public comments received by Ecology during a comment period on key documents, and Ecology's responses to those comments. The responsiveness summary is especially valuable during the Cleanup Action Plan phase at a site when it highlights community concerns.

Risk: The probability that a hazardous substance, when released into the environment, will cause an adverse effect in the exposed humans or living organisms.

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.

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