



DEPARTMENT OF
ECOLOGY
State of Washington

PUBLIC PARTICIPATION PLAN

BOEING FIELD CHEVRON SITE SEATTLE, 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) 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 Field Chevron site located in Tukwila, Washington. This plan describes how Ecology will inform the public about site cleanup activities. It also describes how the community can become involved in this process.

In 2014, Ecology and the potentially liable parties (PLPs), Mr. Rajbir Sandhu, Ms. Pradeep Sandhu, RPNP Corporation, and Chevron Environmental Management Company, began negotiations for an Agreed Order DE 10947. The Agreed Order is a legal agreement between Ecology and the PLPs. It describes the work that the PLPs agree to perform on the site. It ensures timely cleanup that protects human health and the environment according to Washington State's cleanup law, the Model Toxics Control Act and the Sediment Management Standards.

Location and Site Background



Boeing Field Chevron

Location

Boeing Field Chevron Site (Site) is located at 10805 E. Marginal Way, Tukwila, on the east side of the Lower Duwamish Waterway. Final boundaries of the Site will be defined by the extent of contamination at and migrating from the Boeing Field Chevron property as determined during the Remedial Investigations. The property is bordered on the west by Pacific Highway South and on the east by East Marginal Way. It is also located approximately 250 feet east of the Lower Duwamish Waterway, and approximately a half mile southwest of Boeing Field.

Lower Duwamish Waterway (LDW) Cleanup

The Site is in an industrial area next to, but not part of, the LDW cleanup site in south Seattle. The Site will benefit from a public involvement approach similar to sites within the LDW site.

The 5.5 mile LDW site is a contaminated site under both state and federal law. Ecology and the U.S. Environmental Protection Agency (EPA) are working to clean up contaminated sediments and control sources of recontamination in the LDW. The LDW was added to the National Priorities List (Superfund) by EPA on September 13, 2001. Ecology added the LDW to the Washington State Hazardous Sites List on February 26, 2002. There are also several sites in the LDW area that are being cleaned up by EPA and Ecology under the Resource Conservation and Recovery Act (RCRA).

The sediments in the waterway contain a wide range of contaminants due to years of industrial activity and run off from urban areas. These contaminants include polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), metals, dioxins, and phthalates.

In December 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, for these four parties to perform a Remedial Investigation (RI) and Feasibility Study (FS) of sediment contamination in the waterway.

EPA leads sediment cleanup and Ecology leads source control work in coordination with the City of Seattle, King County, the Port of Seattle, the City of Tukwila, and EPA. Ecology also supports EPA efforts on sediment cleanup.

In February 2013, the EPA released the Proposed Plan for LDW sediment cleanup and Ecology released a Source Control Strategy revision. The EPA and Ecology held a public comment period from February 28 – June 13, 2013 on these plans.

In November 2014, EPA released their Record of Decision for the LDW. It is the final cleanup plan for the river. They hosted public meetings in South Park and Georgetown in January 2015.

Boeing Chevron Site Background

This Site is located in an industrial area near the Lower Duwamish Waterway in Tukwila. A number of commercial and industrial buildings are located within a block of the Site. Southeast of the site is Tukwila's residential neighborhood of Allentown.

The site has been a gas station since approximately 1940. It was operated by Standard Oil and Chevron from the late 1960s to the mid-1980s. In 1990, eight underground storage tanks (USTs), three pump islands, and the former service station building were removed from the Site. In 1995, Pradeep and Rajbir Sandhu purchased the Site and began operation as Boeing Field Chevron. The fueling station includes three underground storage tanks with associated pump islands and dispensers, a car wash and a convenience store building. The fueling station is still in operation.

The Site's groundwater is connected to the Duwamish River which means there is a potential for Site contamination to impact the Duwamish River. Ecology added the site to the Washington State Hazardous Sites List on August 27, 2014.

Contaminants of Concern

Contamination at this Site is due to releases from historical and current operations. The contaminants of concern in the soil and groundwater are:

- Petroleum hydrocarbons (gasoline and diesel)
- Benzene
- Toluene
- Ethylbenzene
- Xylenes
- Light Non-aqueous Phase Liquids (LNAPLs)

Previous Cleanup Work

In 1990, Chevron reported a release during removal of underground storage tanks. Approximately 2,500 cubic yards of petroleum contaminated soil was removed from the Site between 1990 and 1995.

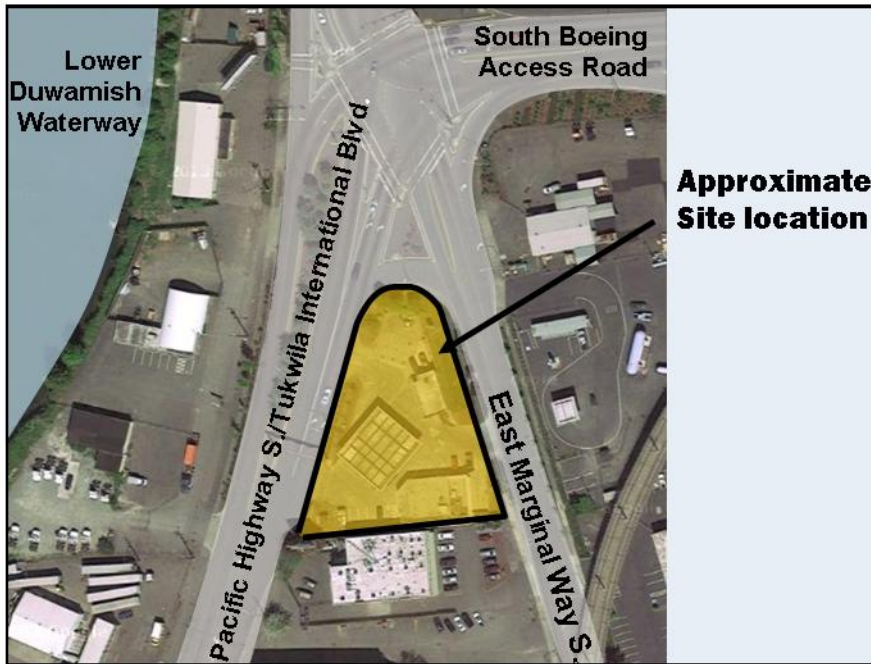
In 1996, Chevron reported a second release during removal of another underground storage tank. After tank removal, groundwater in site monitoring wells continued to contain concentrations of hydrocarbons (both gasoline and diesel) and benzene above cleanup levels. These elevated concentrations were still present in 2003.

In 2003, a Chevron contractor reported a third release based on groundwater monitoring and sampling activities. Approximately 3.5 to 4 feet of a petroleum substance (free-phase light non-aqueous phase liquids or LNAPL) were detected in May and November of 2003 in a monitoring well. LNAPL had not been observed in this well prior to May 2003. Environmental investigations indicate that LNAPL is floating on the groundwater surface in several locations on site.

Current Site Activity

Ecology is entering into a new Agreed Order for this Site with the current property owners (Pradeep Sandhu and Rajbir Sandhu), the current property operator (RPNP

Corporation), and the former property owner Chevron. Pradeep Sandhu, Rajbir Sandhu, and RPNP Corporation are referred to as “Sandhu” in the Agreed Order. Sandhu and “Chevron U.S.A. Inc.” are PLPs in the Agreed Order. This Agreed Order requires Sandhu and Chevron U.S.A. Inc to perform the actions set forth in the Scope of Work, which is Exhibit B to the Agreed Order.



Site Map: Boeing Field Chevron Property

Community Profile

For decades much of the land along the Duwamish Waterway in Seattle and Tukwila 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 Site is viewed primarily as an industrial corridor, residential neighborhoods border the banks of the river. In Tukwila, upriver from the LDW Site, the

Allentown neighborhood is on the east bank of the river. In Seattle there are two neighborhoods: South Park (western bank) and Georgetown (eastern bank).

Area residents have expressed concerns about LDW contamination and environmental groups have been active in sharing information with the community. A description of these communities is provided below.

Allentown Community Description

Allentown is a neighborhood in north Tukwila. Its western and southern border is the Duwamish River, and its northern and eastern border is the BNSF railroad. Based on 2010 Census information, the neighborhood is comprised of about 1,090 people of various ethnicities: 44% White, 33% Asian, 13% Black, 2% American Indian, 1% Pacific Islander. 75% of residents are over age 18. Allentown is home to the Tukwila Community Center

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 and 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 into a 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.

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 Lower Duwamish Waterway 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, and annual Arts and Garden Tours. 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 which meets once a month and is very active in the community.

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 lower Duwamish waterway 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 Lower Duwamish Waterway. 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.

Key Community Concerns and Issues

Ecology and EPA interviewed community members, environmental organizations, and community organizations in October 2002 for the LDW Site Community Involvement Plan. Ecology did brief community interviews in 2006 and found that 2002 concerns were still true. In 2008, stakeholder groups provided comments to EPA and Ecology on the LDW Remedial Investigation Draft Report developed for the Lower Duwamish Waterway Superfund Site. Although these comments were about the entire Superfund site, they are important to the Boeing Field Chevron Site because it is next to the Superfund site.

Stakeholders are interested in Lower Duwamish Waterway cleanup. The following is representative of significant concerns and issues expressed during the community interviews.

- **Health:** Stakeholders are concerned that living close to the Lower Duwamish Waterway could affect their health. They expressed concern about consumption of all bottomfish 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, bottomfish, 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 Duwamish Waterway.
- **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 Lower Duwamish Waterway as a Superfund site.

- **Cleanup:** Some people are concerned that neighborhoods 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 Lower Duwamish Waterway neighborhoods as industrial, 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 Lower Duwamish Waterway 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 involvement 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 review of legal agreements, remedial investigation, feasibility study, and cleanup of MTCA sites.

Ecology will implement input provided by community residents, businesses, and other stakeholders 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's source control investigation and cleanup.

Formal Public Comment Periods

Comment periods are the primary method Ecology uses to get public feedback on proposed investigations 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 comment in writing and via e-mail. After formal comment periods, Ecology reviews all comments received and responds in a Responsiveness Summary document.

Ecology will consider 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 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. 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 three repositories for the Boeing Field Chevron Site.

- Washington State Department of Ecology, 3190 160th Avenue SE, Bellevue, WA 98008, (425) 649-7190. Please call for an appointment.
- South Park Library, 8604 Eight Ave S. at Cloverdale St. Seattle, WA
- Foster Library, 4060 South 144th Street, Tukwila, WA 98168, (206) 242-1640.

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

<https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=7030>.

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 Seth Preston at (360) 407-6848 or by e-mail at Seth.Preston@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.

Ecology's Northwest Regional Office maintains a list of LDW interested parties. To have your address added or deleted from this mailing list, please contact Ecology's Outreach Specialist Marieke Stientjes Rack at (425) 649-7052 or marieke.rack@ecy.wa.gov.

Fact Sheets

Ecology will mail fact sheets to persons and organizations interested in the Boeing Field Chevron 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* to announce public comment periods and public meetings or hearings for the site.

Public Participation 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 or the Boeing Field Chevron Site, please contact:

Dale Myers, Site Manager
Washington State Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008
Tel: (425) 649-74446
Email: dale.myers@ecy.wa.gov

Marieke Stientjes Rack
Public Involvement
Washington Department of Ecology
3190 160th Ave SE
Bellevue, WA 98008
Tel: (425) 649-7052
Email: Marieke.Rack@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 cleanup actions needed at a site. Orders are subject to public comment. If an order is substantially changed, an additional comment period may occur.

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: 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.

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: 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 some aquifers, ground water 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: Any material that poses a threat to public health and/or the environment. Typical hazardous substances are materials that are toxic, corrosive, ignitable, explosive, or chemically reactive.

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. For example, at this site the upland area is currently being addressed, not the sediment portion.

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 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.

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.

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

SVOCs (semi-volatile organic compounds): This group includes a variety of chemicals that have boiling points higher than water and that may become a gas at temperatures above room temperature. Most of these substances are used as industrial chemicals. They include phenols, polynuclear aromatic hydrocarbons (PAHs), and phthalates. Sites where these potentially toxic chemicals may be found include burn pits, chemical manufacturing plants and disposal areas, electroplating/metal finishing shops, firefighting training areas, hangars/aircraft maintenance areas, solvent degreasing areas, vehicle maintenance areas, and wood preserving pits. These compounds generally evaporate slowly at room temperature. Their water solubility and environmental persistence is highly variable, and they are commonly found as contaminants in soil and water.

TPHs (total petroleum hydrocarbons): Describes a large family of several hundred chemical compounds that originally come from crude oil. Crude oil is used to make petroleum products, which can contaminate the environment. TPH is a mixture of chemicals, but they are all made mainly from hydrogen and carbon, called hydrocarbons. Scientists divide TPH into groups of petroleum hydrocarbons that act alike in soil or water. These groups are called petroleum hydrocarbon fractions. Each fraction contains many individual chemicals.

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