



PUBLIC PARTICIPATION PLAN

**Whitney's Chevrolet, Inc.
123 W Pioneer Avenue
Montesano, Washington**

DRAFT

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INTRODUCTION

Public participation plans promote meaningful involvement during cleanups. This plan describes the tools the Washington State Department of Ecology (Ecology) will use to inform the public and gather input on the Whitney's Chevrolet, Inc. (Whitney's) site cleanup.

SITE LOCATION AND BACKGROUND

The Whitney's cleanup site is located at 123 W Pioneer Avenue in Montesano. The property is currently a car dealership.

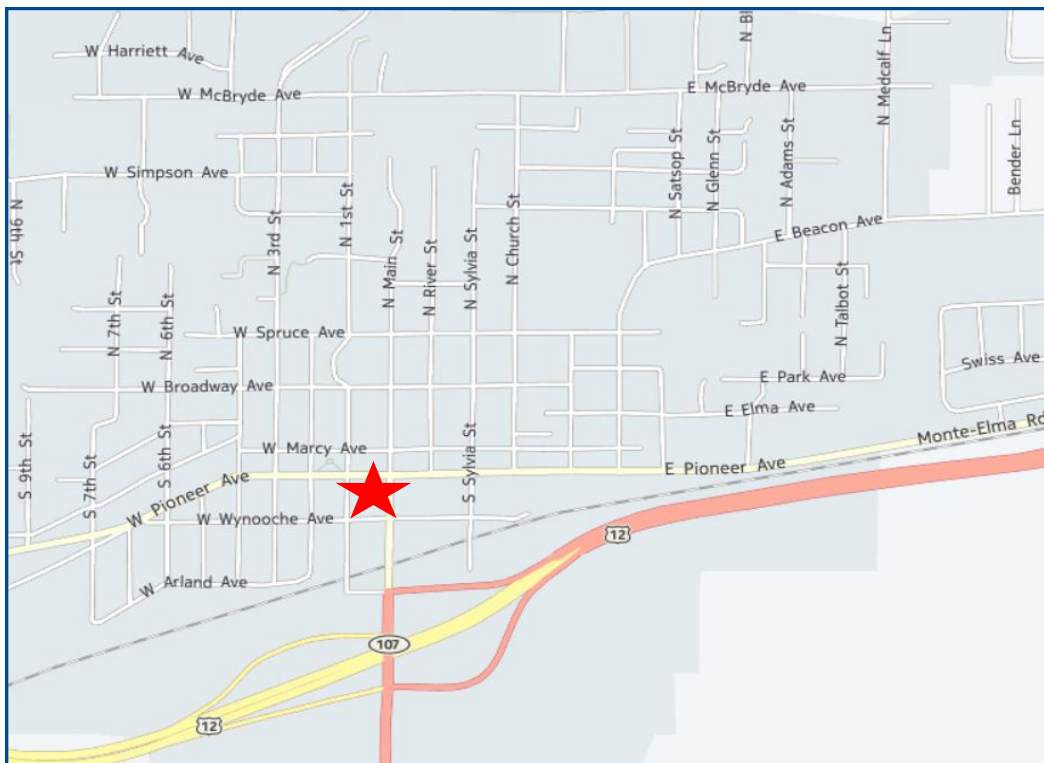


Figure 1. Site location

There are four properties that make up this site:

- Whitney's Chevrolet Inc.
- Sterling Savings Bank
- Charlie's Bar/Veterans of Foreign Wars (VFW) Post #2455
- Tony's Short Stop

Whitney's used to store and sell gasoline on the site. In 1995, they removed three underground storage tanks. Soil samples taken from the pit where the tanks sat showed high levels of benzene, toluene, ethylbenzene, and xylene (BTEX).

In 2003, Ecology found that waste solvents and waste oil were being put into fuel storage tanks. The tanks were then decommissioned and cleaned. However, solvents were found in

groundwater on the Sterling Savings Bank property next door.

During the spring and summer of 2005, Ecology found gasoline range petroleum hydrocarbons and volatile organic compounds (VOCs) in both soil and groundwater samples. Samples were taken around the Whitney's property and were a part of the larger investigation in downtown Montesano.

Visit this site for more on the Downtown Montesano Groundwater Investigation:

http://www.ecy.wa.gov/programs/tcp/sites_brochure/montesano/montesano_hp.htm

A fall 2005 Site Hazard Assessment (SHA) reviewed past land use, sampling results, and other site information. Based on this SHA, Ecology ranked the site with a 3. The potentially liable parties (PLPs) are formally cleaning up the site under the state's cleanup law, Model Toxics Control Act (MTCA). The PLPs responsible for cleanup are:

- Whitney's Chevrolet, Inc.
- Caldwell Family Holdings, LLC
- Wyochee Lodge #42 F&AM

Ecology signed an agreed order (legal agreement) with these PLPs to further investigate the site in 2007.

Between 2008 and 2010, Whitney's sampled groundwater, soil, and indoor air both on and off the property (see below for contamination). In 2011, they did an interim cleanup action (see page 5) and evaluated cleanup options. Ecology and the PLPs amended the agreed order in 2011 to include the interim actions and require the PLPs to draft a cleanup action plan.

Contamination

Leaking underground storage tanks contaminated soil and groundwater. Site studies found:

Soil contaminated with:

- Petroleum hydrocarbons (gasoline and oil range)
- Benzene, toluene, ethylbenzene, xylenes (BTEX)
- Naphthalenes

Groundwater contaminated with:

- Gasoline range petroleum hydrocarbons
- BTEX
- Naphthalenes
- Tetrachloroethene (PCE) – the source of PCE contamination at the site is unknown.

Light non-aqueous phase liquid (LNAPL) consists of gasoline range petroleum hydrocarbons. LNAPL is contamination that is free floating on the upper layer of groundwater. The LNAPL will also need to be removed.

Indoor air was assessed for potential vapor intrusion (see box below). The testing indicates that a few chemicals found in gasoline are evaporating from the soil and groundwater and entering indoor air at nearby buildings. Benzene and ethylene dichloride (EDC) were detected in indoor

air at the Whitney's and Sterling Savings Bank facilities. Benzene was detected at Charlie's Bar/VFW building.

The Department of Health (DOH) did a health consult of the site in 2010. Based on the limited indoor air testing, it appears the health threat to building occupants and customers is low. However, DOH recommended to Ecology that further testing of soil gas, groundwater, and air be conducted so we can fully determine the health threat. Ecology did a thorough review of DOH's recommendations. Ecology feels it is important to move forward with the cleanup process.

Surface water or sediment is not contaminated.

What is Vapor Intrusion?

Volatile chemicals, such as benzene and other solvents, can evaporate from the soil and groundwater and move through spaces in the soil as a gas. It can enter buildings through cracks and other openings in the foundation.

What is groundwater?

Groundwater can be described as water that collects or flows beneath the Earth's surface, filling the porous spaces in soil, sediment, and rocks.

Groundwater largely originates from rain and from melting snow and ice and is the source of water in aquifers and from springs and wells. Groundwater is one of Washington's most vital natural resources so cleanup is important.

Interim Actions

In 2011, Whitney's did some partial cleanup, called interim actions. They removed six underground storage tanks and soil contaminated with petroleum-related chemicals. Afterwards, they did more sampling to see how much contamination remained. Now, only limited areas of the site still contain soil contamination that slightly exceed state cleanup levels.

The remaining soil contamination could not be removed because it is inaccessible and is fully covered with buildings, concrete, or asphalt.

Pilot Study

Prior to developing the draft cleanup plan, the PLPs did a series of pilot tests to evaluate the usefulness of the recommended cleanup actions. The pilot study was done between August and December 2013. It primarily tested two methods: air sparging and soil vapor extraction, which are proposed for cleanup (see current activity, page 7).

The pilot study showed that the groundwater plume is undergoing some cleanup naturally. It also showed that the site soils are conducive to implementing the soil vapor extraction and air sparging methods. Together, these two methods result in a tenfold increase of a contamination removal rate, compared to using air sparging alone. The pilot study results support the proposed cleanup methods presented in the feasibility study and draft cleanup plan.



Approximate boundary of site investigations —————

Approximate site boundary - - - - -

Figure 2. Extent of Site

CURRENT ACTIVITY

Ecology will now hold a public comment period on:

- An **Agreed Order** — a legal agreement that requires the potentially liable persons to clean up the site.
- A **Remedial Investigation** — describes the nature and extent of contamination.
- A **Feasibility Study and Pilot Study Addendum** — evaluates cleanup options and tests the recommended cleanup.
- A **Draft Cleanup Action Plan (CAP)** — outlines the recommended cleanup.
- A **State Environmental Policy Act (SEPA) review** — describes the potential environmental impact of the cleanup work.
- An updated **Public Participation Plan** – which describes the tools Ecology will use to inform the public and gather feedback.

The draft cleanup plan recommends cleaning up the site by:

1. **Removal of LNAPL** – LNAPL would be pumped out through existing wells and disposed off site.
2. **Air sparging (AS) and soil vapor extraction system (SVE)** – This method would inject air into the polluted groundwater, turning it into soil vapor. The SVE system then pulls these vapors from the soil through extraction wells, so they can be treated.
3. **Institutional controls** – The property owners will take measures to limit or prohibit activities that may interfere with the cleanup action, or could result in exposure to contamination.
4. **Compliance monitoring** – After cleanup, monitoring would be done for indoor air, groundwater, and soil to make sure the cleanup actions are successful.

SITE CLEANUP PROCESS

Cleanup activities at the Whitney's Chevrolet, Inc. site fall under Washington's Model Toxics Control Act (MTCA) and accompanying regulations (Revised Code of Washington (RCW) 70.105D and Washington Administrative Code (WAC) 173-340). MTCA has procedures for cleaning up contaminated sites to standards that are safe for both human health and the environment.

Toxic sites are cleaned up in stages, described below. Each stage has a related report or plan that the public is welcome to review and comment on.

Remedial Investigation & Feasibility Study (RI/FS)

The RI looks at the extent and type of pollution on the site. It also looks at possible human health and environmental impacts. The FS identifies and evaluates different cleanup options.

Interim Actions

Ecology may allow Interim Actions to partly clean up a site before the final cleanup plan is complete.

Cleanup Action Plan (CAP)

The CAP describes the cleanup methods and how they will meet Ecology's cleanup standards.

Cleanup

Cleanup removes contaminants from the site, contains them on the site, or treats them to make them less toxic. Based on the information in the RI/FS, Ecology selects a cleanup action and develops a new legal agreement for cleanup. CAPs require a public comment period.

Delisting

Ecology keeps track of toxic cleanup sites on the Hazardous Sites List. Once cleanup is complete, the public will have a chance to comment before Ecology takes a site off the list.

You can find more information about toxic cleanups on Ecology's website:

http://www.ecy.wa.gov/programs/tcp/cu_support/cu_process_steps_defns.htm.

PUBLIC PARTICIPATION ACTIVITIES AND RESPONSIBILITIES

The purpose of this Public Participation Plan is to promote public understanding and participation in the cleanup. This section of the plan describes how Ecology will share information and receive public comments on cleanup activities. Ecology will use the following public involvement activities during the Whitney's Chevrolet, Inc. 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. WAC 173-340-600 requires them at key points during the investigation and cleanup process, before final decisions are made. During a comment period, the public can comment in writing. Ecology can only take verbal

comments during a public hearing.

After comment periods, Ecology reviews all comments and may respond in a document called a responsiveness summary. Ecology considers whether a document or decision needs to be changed or revised based on public input. If there are major changes, Ecology may hold a second comment period. If there are no major changes, Ecology finalizes the draft document(s).

Public Meetings and Hearings

Ecology may hold public meetings at key points during the investigation and cleanup. Ecology also may offer public meetings for actions expected to be of particular interest to the community. Ecology will also hold a public meeting if ten or more people request one. These meetings will be at places and times convenient to the public.

Information Repositories

These are places where the public can read and review site information, including public comment period documents. Ecology has three repositories for this site:

- W.H. Abel Library – 123 Main Street South, Montesano, WA 98563. (360) 249-4211
- Washington State Department of Ecology, 300 Desmond Drive, Lacey 98503. Please call (360) 407-6365 for an appointment.

See also Ecology's website: <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=5963>

Site Register

Ecology's Toxics Cleanup Program uses its bimonthly Site Register to announce public meetings and comment periods, and many other activities. To receive the Site Register by email, contact Seth Preston at (360) 407-6848 or Seth.Preston@ecy.wa.gov. You can also read it on Ecology's website at http://www.ecy.wa.gov/programs/tcp/pub_inv/pub_inv2.html.

Mailing List

Ecology's mailing list for this site includes neighboring landowners and businesses, public agencies, and other known interested parties. Ecology's Southwest Regional Office maintains the list and will update it as needed. Please contact Audrey Kuklok at (360) 407-0067 or Audrey.Kuklok@ecy.wa.gov if you would like to have your address added to or deleted from this mailing list.

Fact Sheets

Ecology will mail fact sheets to people and groups interested in this cleanup. Fact sheets will announce comment periods and public meetings. Ecology also may mail fact sheets with updates on cleanup progress.

Newspaper Display Ads

Ecology will place ads in the *The Daily World* and/or *The Vidette* to announce public comment periods and public meetings for the site.

Plan Update

Ecology may update this Public Participation Plan as the project moves forward. The public will have a chance to comment on any major changes to the plan.

Contacts

If you have questions or need more information about this plan or the Whitney's Chevrolet, Inc. cleanup site, please contact:

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GLOSSARY

Agreed Order: A legal agreement between Ecology and a Potentially Liable Person (see below) to conduct work toward a cleanup.

BTEX: An acronym for Benzene, Toluene, Ethylbenzene, and Xylenes, a group of toxic chemicals that are commonly associated with gasoline and other petroleum products

Cleanup: Actions that deal with a release or threatened release of hazardous substances that could affect public health or the environment. Ecology often uses the term "cleanup" broadly to describe response actions or phases of cleanup, such as the Remedial Investigation/Feasibility Study.

Cleanup Action Plan (CAP): A plan that explains which cleanup option(s) will be used at a site. The Remedial Investigation and Feasibility Study provide the data and analysis to write a CAP. It also takes into account public comments and public 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 spaces between materials such as sand, soil, or gravel. In some aquifers, ground water occurs in large enough amounts to be used for drinking water, irrigation and other purposes.

Information Repository: A file containing site information and reports for public review. It is usually located in a public building convenient for local residents, such as a public school, city hall, or library.

Model Toxics Control Act (MTCA): A law passed by Washington voter initiative in 1988. Its purpose is to find, investigate, and clean up places where hazardous substances have been released. It defines Ecology's role and encourages public involvement in cleanup decisions.

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 PLPs 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.

Sediments: Settled particles located at the bottom of a lake, river or in wetlands. Sediment(s) also includes settled particulate matter exposed by human activity (e.g., dredging) to the biologically active aquatic zone or to the water column.

Site: Any area where a hazardous substance, other than a consumer product in consumer use, has come to be located.

Toxicity: How much harm a substance causes to living organisms, including people, plants and animals, at a certain concentration.

Vapor Intrusion: Vapor intrusion occurs when volatile chemicals move from soil and groundwater up through the ground and into indoor air.