

DEPARTMENT OF  
**ECOLOGY**  
State of Washington

## PUBLIC PARTICIPATION PLAN

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**USG Highway 99 Site  
7110 Pacific Highway East  
Milton, Washington**

**Facility Site Number 84531356  
Cleanup Site Number 3618**

**Prepared by**  
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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 about the USG Highway 99 cleanup.

## LOCATION AND SITE BACKGROUND

The site address is 7110 Pacific Highway East, in Milton. Four businesses occupy the cleanup site: Kanopy Kingdom, Freeway Trailer, General Trailer, and Linwood Custom Home. The majority of the cleanup work will occur on the Kanopy Kingdom and Freeway Trailer properties. To the west of the site is Highway 99/Pacific Highway East and to the east of the site is Interstate 5.

It sits next to and on the banks of the Hylebos Creek, near where the creek flows into the Hylebos Waterway and into Puget Sound.

### Site Background

In the early 1970's, fill was imported to bring the site up to grade with Pacific Highway East. This fill included waste from USG's rock wool (see below) manufacturing plant in Tacoma. Slag, a waste from the former Tacoma Asarco copper smelter, was used as raw material for the rock wool. The slag contained arsenic — a toxic metal.

USG removed waste from the site between 1984—1986 and disposed of it in a licensed landfill. Ecology estimated that 20,000 to 30,000 cubic yards of material was excavated and disposed of during that time. By 1989, the site was developed into its current configuration.

The Model Toxics Control Act (MTCA) went into effect in early 1989. In 1991, Ecology established MTCA Method A arsenic cleanup levels for soil and groundwater. In 2006, Ecology required USG to study soil and groundwater for arsenic again.

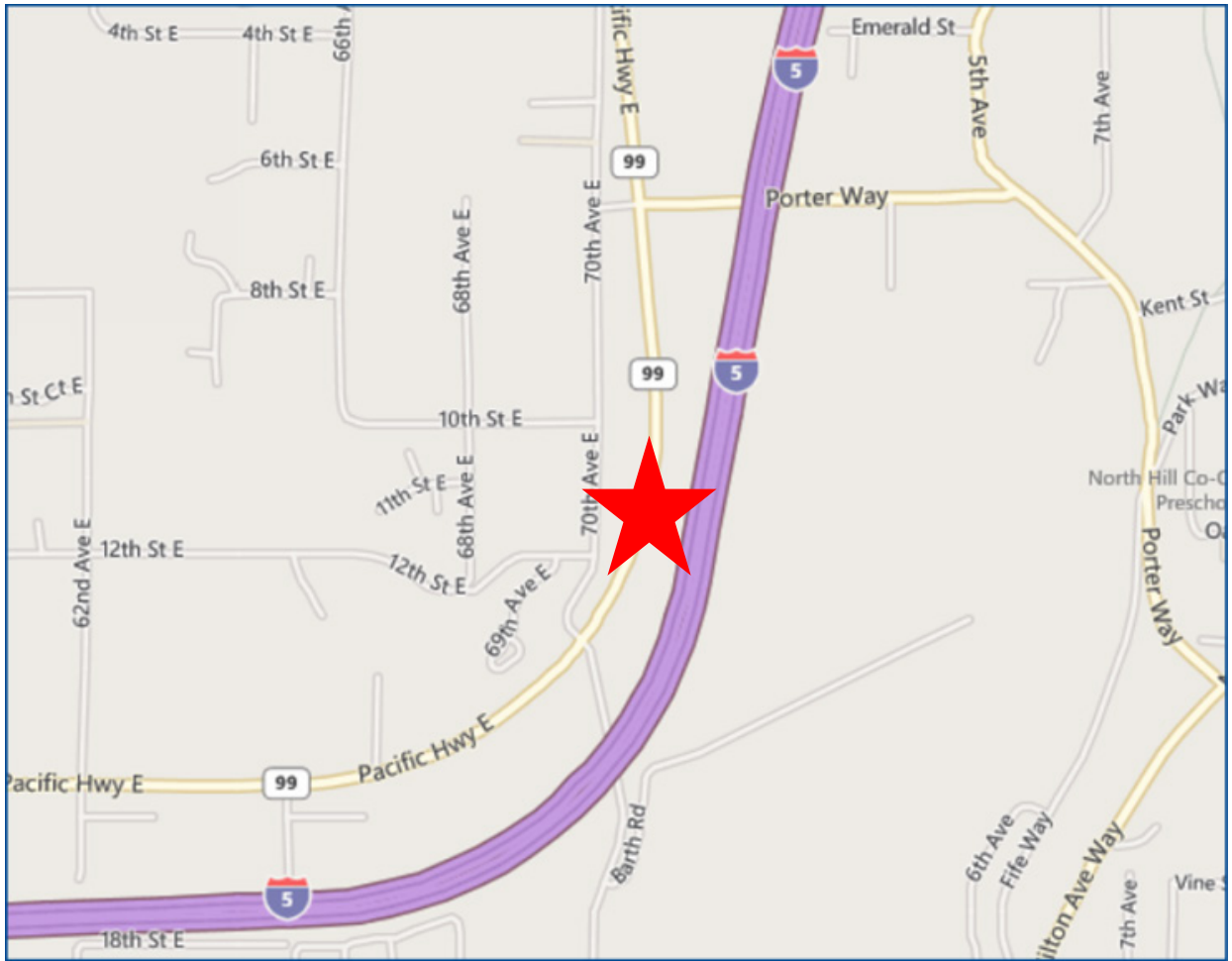
The additional soil and groundwater studies showed arsenic in soil, groundwater, and sediment that exceeds the state cleanup standard. Ecology named USG the potentially liable person responsible for the cleanup in 2007 and entered into agreement with USG to do a remedial investigation/feasibility study (RI/FS) and draft a cleanup action plan in 2009. Ecology and USG are now proposing a draft plan to clean up the site.

### *What is Rock Wool?*

**Rock wool** is an insulating and fire-proofing material. It is made by heating rock until it is molten, and blowing or spinning it into fine fibers.

The waste products from USG's rock wool production included 20,000 tons of what's called "bag house dust" and "shot". Both wastes at the site contain arsenic.

**Arsenic** is a toxic metal. It can occur naturally in the soil or can come from industrial processes. Arsenic can be harmful to human health. For more information about arsenic visit: <http://www.atsdr.cdc.gov/toxfaqs/tf.asp?id=19&tid=3>.



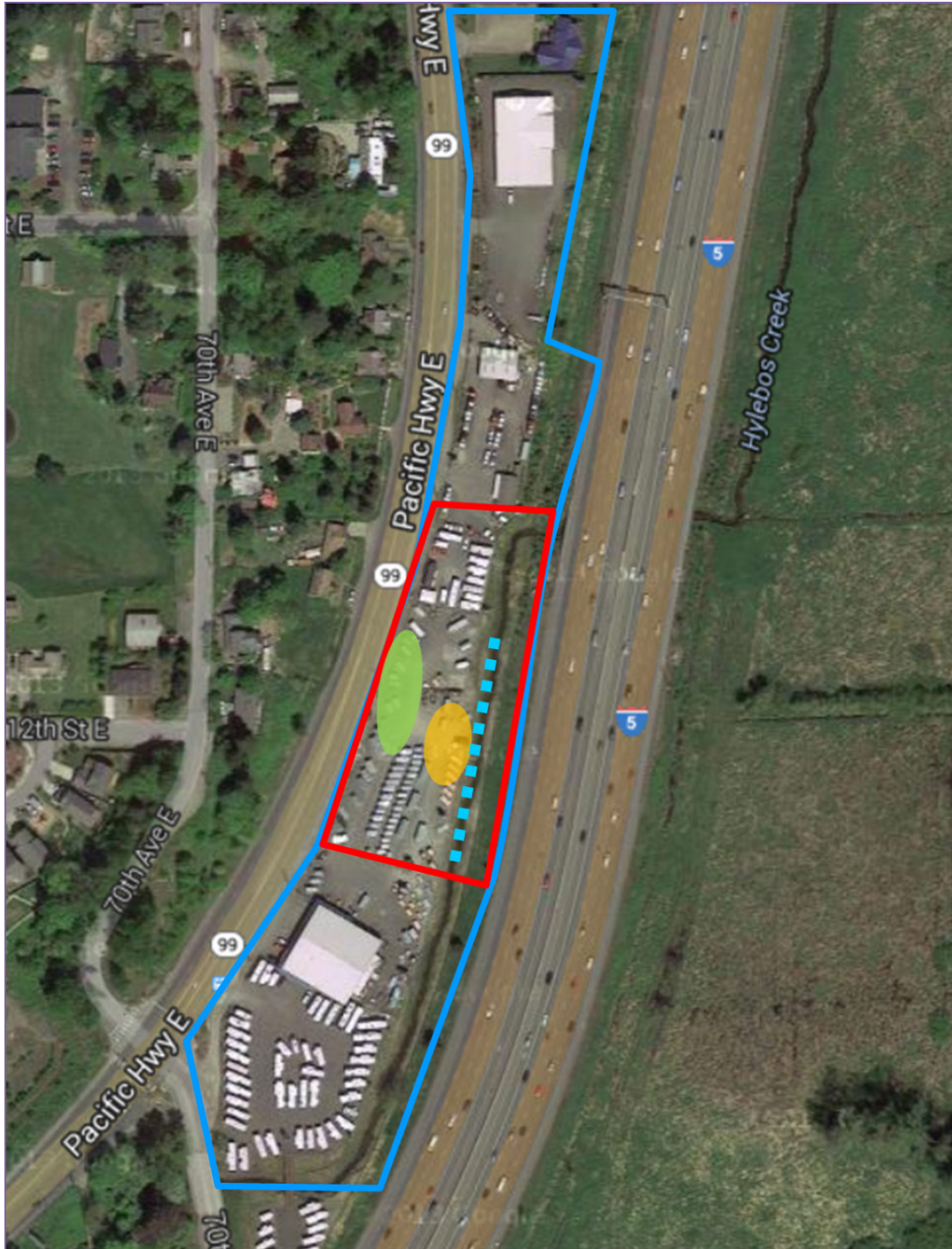
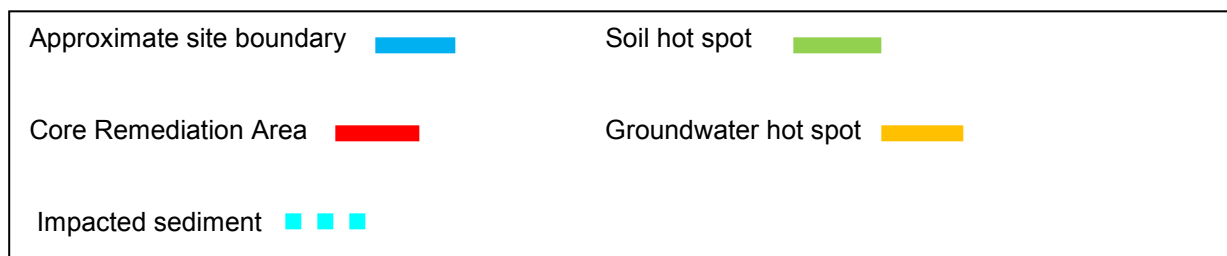


Figure 2. USG Highway 99 Site Map



## PROPOSED CLEANUP

Site studies found arsenic in:

- **Soil**— in a broad area called the core remediation area (see map), reaching up to 16 feet below ground.
- A **soil “hot spot”** — a small area on the western side of the core remediation area, with the highest levels of arsenic. Here, arsenic in soil is in contact with groundwater.
- **Groundwater** — mostly in the core remediation area, and also extending east of Hylebos Creek. A groundwater “hot spot” is next to the soil hotspot. Impacted groundwater is not a threat to the drinking water supply. Water supply for the site and nearby area is supplied by deep groundwater wells.
- **Sediment** — samples collected on the bank of the Hylebos Creek were above cleanup levels for freshwater.

### Cleanup Plan

Under the draft cleanup plan, USG will:

- Study the soil hot spot to better define the area.
- Solidify or chemically stabilize the arsenic within the soil hot spot using a cement-based mixture. This might begin with a bench-scale test.
- Treat site groundwater (including hot spot) using in-situ chemical oxidation (see box below). This would be done with injection wells or trenches. USG will do a pilot test during the engineering design phase of the cleanup.
- Replace part of an existing paved cap with permeable pavement. This allows precipitation, like rainwater, to infiltrate soil and groundwater. The precipitation carries oxygenated water into the soil and groundwater, which reacts with the iron to stabilize the arsenic.
- Monitor groundwater to ensure arsenic levels are naturally declining (called natural attenuation).
- Excavate polluted sediment from Hylebos Creek. The area will be restored with clean sand.
- Apply land use controls or groundwater use restrictions. The property owners will need to record an environmental covenant (EC) for their properties. An EC is a legal document that is attached to the property deed. It prohibits activities that may result in impacts to human health and the environment due to the exposure to the hazardous substances that remain at the site.

USG will submit a monitoring plan to Ecology that describes how they will monitor sediment, soil, and groundwater after cleanup, to make sure cleanup levels are reached.

### **Understanding In-Situ Chemical Oxidation (ISCO)**

The cleanup plan proposes treating groundwater with ISCO. This method injects a chemical called an “oxidant” into groundwater, usually through wells installed in the ground. When the oxidant enters the contaminated groundwater a chemical reaction occurs between naturally occurring iron, oxygen and the arsenic, changing the arsenic to a less mobile form. Examples of oxidants that can be used are: potassium, sodium persulfate, ozone, or hydrogen peroxide.

The benefit of ISCO is it’s “in-situ”, meaning it can be done in place without soil excavation or pumping and treatment of groundwater. For this site, it may also reduce the ability of arsenic in the soil hot spot to leach.

ISCO will help speed up the natural attenuation of arsenic. Natural attenuation relies on natural physical, chemical, or biological processes to lower contamination over time.

### **CURRENT STATUS**

Ecology will hold a public comment period for draft site cleanup plans in fall 2014. Ecology will accept comments on the following draft documents:

- **Agreed Order** — a legal agreement that requires USG, formerly US Gypsum, to clean up the site.
- **Remedial Investigation/Feasibility Study (RI/FS)** — describes the contamination and compares cleanup options.
- **Draft Cleanup Action Plan (CAP)** — outlines the recommended cleanup.
- **Updated Public Participation Plan** — describes the tools Ecology will use to inform the public and gather feedback.
- **State Environmental Policy Act (SEPA) review** — describes the potential environmental impact of the cleanup work.

At the end of the public comment period, Ecology will review all comments we received and respond to commenters. If needed, we will make changes to the draft documents. We will then finalize the documents.

### **Next Steps**

After the comment period, USG can move forward with the cleanup actions. As described in the draft cleanup plan, USG will do smaller scale testing of the ISCO and hot spot solidification methods before fully starting; to make sure the methods work well.

The property owners of the cleanup site will record environmental covenants to each of the properties that apply land use controls and/or groundwater use restrictions. During and after the cleanup, USG will monitor the site to make sure cleanup actions remain protective of human health and the environment.

## **SITE CLEANUP PROCESS**

Washington's Model Toxics Control Act (MTCA) requires that cleanups meet standards that are safe for both human health and the environment. For more information on MTCA, please visit Ecology's website at <http://www.ecy.wa.gov/biblio/ftc94129.html>.

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. The Remedial Investigation and Feasibility Study provide the data and analysis to write a CAP. The CAP also takes into account public comments and concerns.

**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 legal agreement for USG to conduct the cleanup. A CAP requires 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](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 USG Highway 99 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 four repositories for this site:

- Milton/Edgewood Pierce County Library, 900 Meridian E, Suite 29, Milton, WA 98354 (253) 548-3325
- Citizens for a Healthy Bay, 535 Dock Street, Suite 213, Tacoma, WA 98402, (253) 383-2429
- Tacoma Public Library, 1102 Tacoma Avenue South, Tacoma, WA 98402, (253)292-2001
- Washington State Department of Ecology, 300 Desmond Drive SE, Lacey 98516. Please call (360) 407-6365 for an appointment.
- You can also review documents on Ecology's website at: <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3557>.

### **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](mailto: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](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](mailto: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 News Tribune* to announce public comment periods and public meetings for the site.

**Ecology Website**

Information related to this site and materials available for public comment will be posted on Ecology's web site at: <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3618>.

**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 about this plan or the USG Highway 99 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.

**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.

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

**Groundwater:** Water found beneath the earth's surface that fills spaces between materials such as sand, soil, or gravel. In some areas, groundwater 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.

**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.