



DEPARTMENT OF
ECOLOGY
State of Washington

Public Participation Plan

For:

PRS Group, Inc.
3003 Taylor Way
Tacoma, Washington 98421

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To request ADA accommodation for disabilities, call the Hazardous Waste and Toxics Reduction Program at 360-407-6700. Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.

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Introduction

The Washington State Department of Ecology (Ecology) developed this public participation plan (Plan) in cooperation with PRS Group, Inc. (PRS). This plan is for PRS's former interim status hazardous waste treatment, storage, and disposal (TSD) facility located at 3003 Taylor Way, Tacoma, Washington, 98421.

The Plan describes the activities that Ecology will do to inform the public about contamination investigations, selection of cleanup activities, and throughout the corrective action process. Ecology encourages the public to learn about and get involved in decision-making opportunities at the PRS Site. The public can get involved during different stages of the investigation and cleanup of contamination at the Site.

The main objectives of public participation are to:

- Notify the public of opportunities to comment on and be involved in key decisions.
- Provide information and promote public understanding of the cleanup process.
- Open and maintain communication between the public, Ecology, other agencies, and PRS.
- Ensure the public's questions are answered and concerns are addressed.

Plan Contacts

For public participation questions or comments, please contact Ecology's Public Involvement Coordinator for the PRS facility, Bridgette Valdez-Kogle, at brva461@ecy.wa.gov or 360-407-7616. For questions about the proposed activities, please contact Ecology's corrective action project manager for the PRS:

Charles Hoffman
Washington Department of Ecology
PO Box 47775
Olympia, WA 98504-7775
Phone: 360-407-6344
Email: chof461@ecy.wa.gov

Public Participation Grants

Grants may be available to neighborhood committees, non-profits, and other groups near the site. These funds may be used to provide additional public involvement, to receive technical assistance, and/or enhance the public's understanding of the cleanup process. For more information, please contact Lynn Gooding at 360-407-6062 or lynn.gooding@ecy.wa.gov.

For more information about the public participation grants, visit:
<http://www.ecy.wa.gov/programs/swfa/grants/ppg.html>.

Citizens for a Healthy Bay (<http://www.healthybay.org/>) currently have a public participation grant to assist them on cleanup issues in the Commencement Bay area.

Regulatory Framework

There are federal and state regulations governing the management of hazardous wastes. Cleanup at PRS must satisfy federal and state “corrective action” requirements for facilities that manage, or have managed, hazardous wastes. Cleanup is also being completed in accordance with the Washington State’s Model Toxics Control Act (MTCA) regulations.

Hazardous and Dangerous Waste Regulations

The Resource Conservation and Recovery Act (RCRA), an amendment to the Solid Waste Disposal Act, was enacted by the U.S. Congress in 1976 to ensure the safe management and disposal of municipal and industrial waste generated nationwide. RCRA has been amended several times, including in 1984 with the Hazardous and Solid Waste amendments that expanded the scope and requirements of RCRA.

The goals of RCRA are to protect human health and the environment, reduce waste, conserve energy and natural resources, and reduce or eliminate generation of hazardous waste. Subtitle C of RCRA established a program to handle wastes from “cradle to grave.” Owners and operators of waste treatment, storage, and disposal facilities are required to submit a permit application. The permit covers all aspects of design, operation, maintenance and closure of the facility. RCRA requires owners and operators of these facilities to cleanup contamination resulting from past and present practices, including practices of previous owners of the facility. These cleanup activities are known as corrective actions.

The Washington State Dangerous Waste Regulations in WAC 173-303 cover the RCRA hazardous waste universe as well as other “State-only” defined wastes. Together, these wastes are referred to as dangerous wastes. State requirements for dangerous waste management must be at least as stringent as those established by the federal government.

MTCA

MTCA began as a grassroots citizen initiative in 1988 and started the process of cleaning up contaminated sites in Washington State. Under MTCA, a current or past owner or operator may be held responsible for the cleanup of contamination to standards that are safe for human health and the environment. Ecology was mandated with implementing MTCA and overseeing cleanups

in Washington State, and has issued regulations and guidance governing those cleanups. These regulations can be found in WAC 173-340.

Public participation is an important part of cleanup under the MTCA process. Ecology assesses participation needs at each site according to the level of public interest and the degree of risk posed by contaminants. Individuals who live near the site, community groups, businesses, government, other organizations, and interested parties can provide comments on the cleanup process.

State Environmental Policy Act

Compliance with the State Environmental Policy Act (SEPA) will occur during review and development of the Cleanup Action Plan (CAP). Most often, Ecology will combine MTCA and SEPA public comment notices. Ecology will also post SEPA determinations in the SEPA register. The register is updated daily and is available on the SEPA website at www.ecy.wa.gov/programs/sea/sepa/e-review.html.

Facility Background and Site Contamination

The PRS facility was issued an interim status waste management permit for managing dangerous waste in November 20, 1991. After a public comment period, Ecology notified PRS on January 23, 2015, of Ecology's decision to terminate interim status at the PRS facility. Since PRS no longer treats or stores dangerous wastes at its facility, its permit does not allow the company to operate as a dangerous waste management facility at this location.

The PRS facility is located on 0.66 acres in the Port of Tacoma at 3003 Taylor Way. The PRS facility has 22 aboveground storage tanks with secondary containment and concrete pads for loading and unloading. PRS receives and manages wastes from off-site generators. Activities conducted on-site include storage and treatment of used oil for resale and treatment of wastewater suitable for discharge to the local sewer utility. PRS also manages non-dangerous waste sludge for disposal at a Subtitle D landfill.

The PRS facility previously operated as an interim status dangerous waste management facility for Washington "state-only" dangerous wastes. The facility received waste oils containing polychlorinated biphenyls (PCBs) and state toxic wastes.

A new Agreed Order, No. DE 11357, requires PRS to:

- Sample and test groundwater quarterly from nine monitoring wells for one year.
- Submit a data report to Ecology after the year of sampling.
- Compile groundwater data from past sampling events into one report for submittal to Ecology.

- Complete a remedial investigation/feasibility study (RI/FS) report.
- Draft a cleanup action plan (CAP).

Site Community

Because of the small size and industrial nature of the Site, we will use a ¼-mile radius for mailing our public comment notice. There are only industrial properties within this ¼-mile radius.

Public Participation Activities

The public may ask Ecology questions about cleanup at PRS at any time. In addition, the public may review Site documents and send comments to Ecology at any time. This is the most direct way to learn more about the Site and be involved in the cleanup's decision-making.

Public participation activities are coordinated among Ecology and PRS. Ecology maintains overall responsibility and approval authority in accordance with the requirements of the Dangerous Waste Regulations and the MTCA Cleanup Regulation. Ecology will, with participation from PRS, conduct public comment periods and other forms of public involvement when necessary.

The next formal public comment period for the Site will be August 5-September 4, 2015. At that time, the public may comment on a New Agreed Order.

All key Site documents are available for review and the public may read these plans, technical memoranda, and reports at any time.

Public Comment Notices, Fact Sheets, and Other Notices

During specific stages of the cleanup, Ecology will create and mail public comment notices to addresses within the Site's affected area. In general, we will send notice to all addresses within a 1/4-mile radius of the facility, agencies with jurisdiction and to interested organizations and individuals. These notices will provide general information about the Site, the status of the Site, contact information for submitting comments, and times and locations of public meetings or hearings.

Ecology may also develop fact sheets explaining what is happening at the Site, the Site background, and next-steps in the process. The fact sheets also provide contact information for the public if they want to comment. These fact sheets will be available online and in the document repositories.

Public Comment Periods

Formal **30-day comment periods** allow interested members of the public an opportunity to comment on draft Site documents, amended Orders or newly proposed cleanup actions. In these cases, we ask the public to comment on a draft document or proposal. If there is significant interest, Ecology may extend the public comment period to 60 days.

Public Meetings

We will hold public meetings, workshops, open houses, and public hearings based on community interest. These meetings are held at locations close to the Site that meet *Americans with Disabilities Act* standards. Public meetings, workshops, open houses, and hearings are always announced in advance, using a variety of methods.

Site Register

Information from the Public Comment Notices and Fact Sheets will be on the Statewide Site Register. The Site Register is available on Ecology's website:
www.ecy.wa.gov/programs/tcp/pub_inv/pub_inv2.html.

It is also sent to those on its mailing list. Persons interested in receiving the Site Register should contact Seth Preston at Ecology at 360-407-6848 or e-mail seth.preston@ecy.wa.gov.

Display Ads or Legal Notices

These will announce public comment periods, public meetings, workshops, open houses, and public hearings. We will publish these ads or notices in *The Tacoma News Tribune*. We will also place notice on the Ecology Public Events Calendar at <http://apps.ecy.wa.gov/pubcalendar/calendar.asp>. These notices may be placed in more localized or culturally relevant newspapers in addition to *The Tacoma News Tribune*.

Email Listservs

Ecology will also post public comment period information on our Dangerous Waste Listserv. To subscribe to this listserv, go to:

<http://listserv.wa.gov/cgi-bin/wa?SUBED1=DWFACILITIES-PUBLIC-NOTICE&A=1>

Ecology may also provide updated information to community listservs. It will be up to the administrators of these listservs to identify what Site information is of most interest and how often Ecology should provide updates. The administrators will then post the updates that Ecology provides.

Mailing List

Ecology developed a mailing list that includes individuals interested in Site activities and those with property addresses in the Site area. These persons will receive (via first class mail) public comment notices at different stages of the cleanup. We will add additional individuals, organizations, other interested parties, and local, state, and federal governments to the mailing list as requested. If you would like to be added to the mailing list for this Site, contact Bridgette Valdez-Kogle, the Site's Public Involvement Coordinator, at 360-407-7616 or brva461@ecy.wa.gov.

Site Repositories

During public comment periods, you can find important documents at the following locations:

Department of Ecology	Citizens for a Healthy Bay	Mary Rose Kobetich Library
Southwest Regional Office	917 Pacific Avenue, Suite 100	212 Browns Point Blvd NE
300 Desmond Drive SW	Tacoma, Washington 98402	Tacoma, WA 98422
Lacey, WA 98502	253-383-2429	253-248-7265
360-407-6300		

Please call to confirm office hours for each location.

If you would like to view documents outside of a formal public comment period, contact Charles Hoffman at chof461@ecy.wa.gov or 360-407-6344.

Ecology will also provide many of the relevant documents online at Ecology's website for PRS at <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3255>. Click on "View Electronic Documents" on the right side of the screen to access the important documents.

Plan Amendments

This plan was developed by Ecology, and complies with MTCA regulations (WAC 173-340-600). It will be reviewed as cleanup progresses, and amended if necessary. Ecology provides final approval of the Plan and amendments.

This Plan includes information for the public regarding opportunities for public involvement and comment. The outreach activities discussed in this section reflect Ecology's current plans for keeping the public informed and providing ways for those interested in the Site to communicate their concerns and questions to us. If members of the public feel the planned outreach activities and mechanisms described in this Plan are insufficient, or should otherwise be modified, we will work with those members of the public to find solutions. New outreach activities or outreach mechanisms established as a result can be implemented right away, with or without amendment of the Plan.