

PUBLIC PARTICIPATION PLAN

WEST OF 4TH (W4) SITE

W4 DRAFT DELIVERABLE PREPARED JOINTLY BY:

ART BRASS PLATING, INC.

BLASER DIE CASTING CO.

PSC ENVIRONMENTAL SERVICES, LLC

CAPITAL INDUSTRIES, INC.

REVISED AND FINALIZED BY:

Washington State Department of Ecology

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Figure 1 *Site Diagram (page 3-3)*

1.0 GETTING INVOLVED IN THE CLEANUP OF THE WEST OF 4TH SITE

The Washington State Department of Ecology (Ecology) encourages the public to learn about and get involved in decision-making for environmental cleanup activities occurring at the West of 4th Site located in Georgetown, Seattle, Washington (see locations and site map, Figure 1, page 3-3).

The West of 4th Site (the “Site”) consists of contaminated soils and groundwater located between 4th Ave. S. and the Duwamish Waterway. Within this area, releases from three properties owned by Capital Industries, Inc. (CI), Art Brass Plating, Inc. (ABP), and Blaser Die Casting Co. (BDC) have contributed to the contamination. In addition, releases from Burlington Environmental’s Georgetown facility (PSC-Georgetown facility)¹, located east of 4th Ave. S. at 734 S. Lucile St., have led to the migration of contaminated groundwater into the West of 4th Site area. The four companies are potentially liable persons (PLPs) under State law and are collectively referred to as the “West of 4th Group.”

This Public Participation Plan (PPP) has been prepared by Ecology and the West of 4th Group in accordance with Agreed Order No. DE 10402. The Agreed Order was signed by the West of 4th Group and Ecology in April 2014. The Order guides the performance of a Feasibility Study, which evaluates cleanup action options prior to proposing a preferred action, or actions, to the public. Requirements for conducting Feasibility Studies and ensuring opportunities for public participation throughout the cleanup process are contained in the Washington State Model Toxics Control Act (MTCA) Cleanup Regulations, as established in Chapter 173-340 of the Washington Administrative Code (WAC).

The PPP begins with an overview of the Plan itself. It then:

- outlines the purpose of a PPP;
- identifies affected, and potentially affected, areas within the Site;
- discusses the federal and state laws that guide the cleanup process at this Site;
- describes when public comment periods are expected to occur, how the public will be notified, and the amount of time the public typically has to comment; and
- discusses how the public may become involved in the decision-making process at the Site.

The PPP also provides Site background information (Section 3.0) and a local community profile (Section 5.0). Community concerns the PLPs and Ecology are aware of at this time are identified in Section 5.1.

¹ Burlington Environmental, LLC is a wholly-owned subsidiary of PSC Environmental Services, LLC which is a wholly-owned subsidiary of Stericycle Environmental Solutions, Inc. (“Stericycle”).

2.0 PURPOSE AND ORGANIZATION

The purpose of this PPP is to outline how to provide the public with information regarding the cleanup of the Site and how they can participate in the Site decision-making process. It also describes how Ecology will ask for public input during and following the evaluation of cleanup alternatives. The West of 4th Group will present these cleanup alternatives in a future Feasibility Study (FS) Report and draft Cleanup Action Plan (CAP).

More specifically, the purpose of the PPP is to:

- promote public understanding of Ecology's and the West of 4th Group's responsibilities for planning and conducting cleanup activities at the Site;
- serve as a way of gathering information from the public to assist Ecology and the West of 4th Group plan and conduct the cleanup in a manner that is protective of human health and the environment and responsive to local community needs and concerns; and
- inform the community living and working near the Site, as well as the general public, about cleanup progress and how to contribute to the decision-making process.

This PPP is organized into the following sections:

- **Site Overview**—Presents summaries of the Remedial Investigations (RIs) and interim cleanup actions to date. This section also includes a discussion of current activities at the Site.
- **Regulatory Framework**—Presents the primary regulations that the Site work is being performed in accordance with.
- **Site Community**—Presents a description of the local community located at and near the Site, and their known and potential concerns.
- **Public Participation**—Presents information on how the public may participate during the decision-making process. The PPP also discusses anticipated public notifications and comment periods.
- **Amendments**—Presents a description of future situations that would lead to revision of, or amendments to, the PPP.

3.0 SITE OVERVIEW

Four facilities have been identified as sources of contamination at the Site:

- ABP facility located at 5516 3rd Avenue South;
- BDC facility located at 5700 3rd Avenue South;
- CI facility located at 5801 3rd Avenue South; and
- Stericycle’s “PSC-Georgetown” (or, “Burlington Environmental-Georgetown”) facility located at 734 South Lucile Street, east of 4th Avenue South.

As noted above, Burlington Environmental, LLC is a wholly-owned subsidiary of PSC Environmental Services, LLC, which is now a wholly-owned subsidiary of Stericycle Environmental Solutions, Inc. Company staff responsible for the management of the site cleanup are located at the Stericycle Environmental Solutions office in Kent (see Project Contacts on page 6-4).

Because the public has become familiar with the facility and site under the name “PSC-Georgetown,” Ecology uses this terminology below to minimize confusion. Likewise, references in the Plan to the company who owns the 734 South Lucile Street property and is conducting the site cleanup use “PSC” instead of Stericycle Environmental Solutions.

Figure 1 illustrates the location of these facilities. Cleanup activities at ABP, BDC, and CI are overseen by Ecology. None of these facilities treat, store, or dispose of hazardous or dangerous wastes. Cleanup activities at PSC are also overseen by Ecology. However, because the PSC-Georgetown Facility operated as a RCRA² hazardous waste treatment and storage facility in the past, the U.S. Environmental Protection Agency (EPA) oversaw the cleanup prior to 2003. EPA continues to track PSC’s cleanup progress and provides Ecology comments on key site documents.

The following sections provide a summary of facility background information, descriptions of sources of the contaminants of concern (COCs), and cleanup histories of the facilities. The primary COCs at the West of 4th Site are:

- chlorinated solvent compounds such as trichloroethene (TCE) and their breakdown products (e.g., vinyl chloride) and
- toxic metals (copper, nickel, and zinc) released during plating operations at the ABP Facility.

² “RCRA” stands for Resource Conservation and Recovery Act. Federal regulations under RCRA govern the management of hazardous wastes. Washington State’s dangerous waste regulations in WAC 173-303 apply to facilities within the State and are at least as stringent as the federal hazardous waste regulations.

More specific information regarding the findings of each facility's investigations and the interim actions performed to date may be found in the facilities' information repositories (please see Section 6.3, General Information for the Public).

The purpose of an RI is to understand the nature and extent of site contamination well enough to identify the potential risks it poses to human health and the environment. RIs have been conducted at the individual PSC, ABP, BDC, and CI facilities. The RIs provided environmental data that will now be used to identify, evaluate, and select cleanup action alternatives for the Site during the FS. Once Ecology has approved the FS Report, the preferred alternative will be identified and described in a draft CAP.

The RI reports and the various progress and monitoring reports associated with the cleanup work at the four facilities are available for review at the repositories identified in Section 6.3. As work progresses under the Order, documents prepared in support of the FS, and FS Reports will also be added to the repositories.

To better administer the environmental cleanup, the West of 4th Site has been divided into two "site units:" Site Unit #1 (SU1) and Site Unit #2 (SU2). They are both depicted on Figure 1 of the Agreed Order and on the map below. The ABP facility property is located within SU1; the BDC and CI facility properties are located within SU2. Site documents submitted during the FS will sometimes apply to the entire Site, but there will also be a number of SU-specific documents that focus only on the contamination found within that particular unit.

3.1 ART BRASS PLATING, INC.

The ABP facility is located at 5516 3rd Avenue South. Since 1983, the ABP facility has been operated exclusively for metal plating and related work (e.g., metal polishing and powder coating). Metal plating has included nickel, chrome, brass (an alloy of copper and zinc), copper, and gold. The chlorinated solvent TCE was used at the ABP facility for vapor degreasing from approximately 1983 to February 2004.

Environmental investigations confirm the release of chlorinated solvents and plating metals from the ABP facility to soil and groundwater. The investigation data show that TCE, dichloroethenes (DCEs), and vinyl chloride migrate to the west and southwest with groundwater flow.³ These chemicals are part of a class of contaminants referred to as "chlorinated volatile organic compounds" or "CVOCs." Groundwater contamination extends to the Duwamish Waterway. The RI data also indicate that acidic plating solutions were released in the past. This resulted in elevated concentrations of cadmium, copper, nickel, and zinc in soil and groundwater beneath and proximate to the ABP facility.

In September 2008, ABP installed an air sparging (AS) and soil vapor extraction (SVE) system to remove chlorinated COCs from soil and groundwater at and around their property. Since this action was taken before a final cleanup action had been determined, it is referred to as an

³ In the subsurface environment the TCE molecule can break down, forming other chemicals. This has occurred at the Site, where DCEs and vinyl chloride have been formed as TCE has broken down.



Figure 1: Site Location Map

“interim action” or “interim measure.” Air sparging blows air into the groundwater. This causes contaminants like TCE and other CVOCs to volatilize or evaporate into vapor. The SVE system then collects and treats the volatilized contaminants. ABP’s AS/SVE system operated continuously until 2011 (except for periodic shut-downs for monitoring and maintenance). In late 2011, the sparging portion of the system was switched to a pulsed operation, so that it now runs for 6 months then shuts off for 6 months. To date the system has removed approximately 85 pounds of TCE from the subsurface, and groundwater concentrations of TCE have significantly declined at monitoring wells in and around the treatment area.

Soil contamination exceeds preliminary soil cleanup standards for protection of groundwater on portions of the ABP property. Preliminary groundwater cleanup standards protective of surface water are also exceeded. TCE and vinyl chloride have been detected in groundwater monitoring wells from 3rd Ave. S. to as far “downgradient” (west and southwest) as the Waterway.

3.2 BLASER DIE CASTING CO.

The BDC facility is located at 5700 3rd Avenue South. BDC has occupied its present location since 1962 and performed die casting until 2010, when the building was converted to a storage and distribution facility. BDC’s casting processes did not change substantively between 1962 and 2010. A review of processes, materials, waste oil testing, and interviews of key employees provided no records that TCE was ever used by BDC or used at the property. Nevertheless, a release of TCE likely occurred sometime before 1996, when a warehouse and temporary storage space building addition was constructed at the BDC facility.

Pre-RI soil and groundwater data indicated that a TCE release occurred to soils beneath what is now the southwest corner of the BDC addition. In January 2008 BDC therefore conducted an interim action. They removed about 1,200 tons of soil and 7,250 gallons of groundwater from an excavation in the contaminated area. Soil was excavated below the water table by dewatering to about 8 feet below ground surface. The excavation was extended horizontally until sampling indicated that elevated concentrations had been removed, or existing building structures or utilities impeded further excavation. Some soil with COC concentrations exceeding levels protective of groundwater quality remains on the property at the north end of the excavation, where additional excavation was not feasible. Subsequent groundwater monitoring has demonstrated a significant decrease in groundwater TCE concentrations in the vicinity of the BDC property.

The CI facility property is located close to BDC, about half a block south. Groundwater flow direction near the properties is generally towards the southwest. Between the two facilities, preliminary groundwater cleanup levels are exceeded in some areas at certain depths.

3.3 CAPITAL INDUSTRIES, INC.

Former operations at the CI facility included use of a vapor degreaser once located in Capital Plant 4, and use of a solvent-based parts cleaner formerly located in Capital Plant 2. Releases of TCE and/or tetrachloroethene (PCE) to soil and groundwater may have resulted from operating these units, but there is no documented record of a significant release of solvents from either. Nevertheless, concentrations of PCE and TCE have been detected in soil, groundwater, and soil gas at the CI facility.

The nature and extent of PCE, TCE, and their CVOC breakdown products in soil and groundwater are described in CI’s 2012 RI Report. No interim action has been performed to speed the cleanup of this contamination because of the relatively low concentrations and limited distribution of CVOCs found in soils to date.

In early 2004 a fire destroyed CI's Plant 2 building. Results of pre-RI investigations, soil gas monitoring and soil sampling conducted during excavation and reconstruction of the building did not detect significant concentrations of CVOCs in soil. Groundwater sampling data, however, suggest that a source of CVOCs was, and is likely to still be, present.

Soil contamination exceeds preliminary soil cleanup standards for protection of groundwater on portions of the CI property (beneath Plant 4, for example). Preliminary groundwater cleanup standards protective of surface water are also exceeded. TCE and vinyl chloride have been detected in groundwater monitoring wells from the facility property "downgradient" (southwest) to East Marginal Way S.

3.4 PSC ENVIRONMENTAL SERVICES, LLC

PSC operated a RCRA-permitted hazardous waste management facility at 734 South Lucile Street, east of 4th Avenue South. The facility closed in December 2003. During that same year, PSC purchased an adjacent parcel of approximately 1.3 acres located at 5400 Denver Avenue South (the former Amalgamated Sugar Company or "TASCO" or "White Satin Sugar" property). The following year PSC constructed a belowground barrier wall that encompasses much of the 734 Lucile and 5400 Denver properties. The barrier wall, implemented as an interim action, serves to prevent the continued westward migration of contaminated groundwater from areas below the facility property.

During its RI, PSC performed soil sampling on and near its property. Soil contamination exceeding State cleanup standards is present on the PSC property and in areas on the adjoining (to the east) Union Pacific property. These soils are "capped" with a cover on PSC's property. Contaminants detected in soils during PSC's RI include CVOCs, semi-volatile organic compounds, PCBs, and toxic metals.

PSC also performed groundwater, soil gas, and indoor air sampling during and following its RI. Cleanup standards are exceeded in groundwater beneath PSC's property, east and north of their property, and in areas downgradient to the west and southwest. In general, TCE, vinyl chloride, and 1,4-dioxane are the groundwater contaminants that have migrated the farthest. The eastern area of the PSC-Georgetown site, east of 4th Avenue South, is being addressed under a May 2010 Cleanup Action Plan and Agreed Order No. DE 7347. Since 2010 a number of cleanup actions have been completed in this area, including soil excavations on PSC's Union Pacific's properties. A 2011 Public Participation Plan describes public outreach activities associated with the eastern part of PSC's site.

3.5 EXPOSURE PATHWAYS OF CONCERN

Soils and groundwater are contaminated at the West of 4th Site. Soil contamination is primarily limited to the ABP, BDC, and CI properties, which accounts for a relatively small area within the Site. Contaminated soils are presently covered by buildings or pavement, preventing direct human exposure to the contaminants.

Groundwater in the Site area is not a source of drinking water. Nor will it be a drinking water source in the foreseeable future. Groundwater contamination, therefore, is primarily a potential threat to human health and the environment via two “exposure pathways.” It can:

- (1) Migrate as far as the Duwamish Waterway and discharge into the river. Groundwater in the Duwamish Valley generally moves from east to west, discharging into the Waterway. Any contamination in discharging groundwater has the potential to adversely affect wildlife (fish, shellfish, and other parts of the Waterway’s ecosystem). Members of the public eating contaminated fish and shellfish harvested from the Duwamish River could then be exposed as well.
- (2) Volatilize and contaminate “soil gas” above the water table. This soil gas can enter buildings through cracks or other openings in foundations, a phenomenon called *vapor intrusion*. For vapor intrusion to contaminate indoor air, a) the groundwater contaminant must be volatile (as PCE, TCE, and vinyl chloride are) and b) the contamination must be present in the shallowest groundwater zone (i.e., at the water table).⁴

During their RIs, all four West of 4th companies assessed the possibility of vapor intrusion contaminating indoor air in buildings above or near shallow groundwater contamination. These assessments will continue during the FS phase. Assessment includes comparisons of shallow groundwater PCE, TCE, and vinyl chloride concentrations to protective levels too low to result in elevated indoor air concentrations. In areas where shallow groundwater PCE, TCE, or vinyl chloride concentrations exceed these protective levels, indoor air and/or soil gas samples are collected. Any PCE, TCE, and vinyl chloride levels detected in these indoor air and/or soil gas samples are then compared to protective, health-based levels. If the health-based levels are exceeded, and the reason for the exceedance is vapor intrusion, the West of 4th Group is obligated to offer the building owner a “mitigation system.” Some 30 such systems have been installed in areas east and west of 4th Ave. S. They are very similar to the fan-and-piping systems commonly used to prevent subsurface radon from contaminating indoor air.

As noted above, the primary West of 4th COCs are:

- PCE (tetrachloroethene, tetrachloroethylene, perchloroethylene, or “perc”), a cancer-causing chemical also capable of producing non-cancer health effects.
- TCE (trichloroethene or trichloroethylene), a cancer-causing chemical also capable of producing non-cancer health effects. PCE can breakdown to form TCE in groundwater.
- DCEs (dichloroethenes; primarily cis-1,2-dichloroethene, trans-1,2-dichloroethene, and 1,1-dichloroethene), chemicals capable of producing non-cancer health effects. TCE can breakdown to form DCEs in groundwater.

⁴ Vapor intrusion can also occur if there is soil contamination above the water table.

- Vinyl chloride (sometimes abbreviated “VC”), a cancer-causing chemical also capable of producing non-cancer health effects. TCE and DCEs can breakdown to form vinyl chloride in groundwater.
- Nickel, a toxic metal capable of producing non-cancer health effects.
- Zinc, a toxic metal capable of producing non-cancer health effects.
- Copper, a toxic metal capable of producing non-cancer health effects.
- 1,4-dioxane, a cancer-causing chemical also capable of producing non-cancer health effects.⁵

Toxicity information for the chemicals listed above can be obtained from the following sources:

- (1) Agency for Toxic Substances and Disease Registry (ATSDR) website [<http://www.atsdr.cdc.gov/substances/index.asp>]
- (2) EPA's Integrated Risk Information System (IRIS) website [<http://www.epa.gov/iris/>]

3.6 CURRENT WORK

Current work being performed at the Site under the West of 4th Agreed Order includes:

- Completion of an FS for the purpose of evaluating cleanup options and selecting preferred cleanup alternative(s) for SU1 and SU2.
- Completion of a draft CAP describing the preferred cleanup alternative(s) for SU1 and SU2, and providing detailed information pertaining to cleanup action implementation. The draft CAP will be presented to the public for review and comment prior to finalization.
- Continuation of interim cleanup action activities at the ABP Facility.
- Continuation of groundwater monitoring and sampling throughout the Site to monitor the stability of plumes, evaluate whether further interim actions are necessary to protect human health and the environment, and support the FS and CAP work.
- Continuation of vapor intrusion assessment to evaluate whether any additional buildings within the footprint of the groundwater plumes require mitigation pending completion of Site cleanup. Where buildings at the Site have already been mitigated, inspections and monitoring will continue to ensure mitigation performance.

Cleanup of the eastern portion of PSC’s Georgetown site will continue under a separate Agreed Order. These cleanup activities are expected to result in reduced levels of groundwater contamination migrating onto the West of 4th Site.

⁵ Though present in Site groundwater, 1,4-dioxane appears to have migrated from areas east of 4th Ave. There is no known source west of 4th. The cleanup of this contaminant is therefore being addressed under PSC’s east-of-4th Agreed Order.

Additional information regarding Site work can be found in the repositories and resources cited in Section 6, Public Participation. This Section also identifies individuals representing each of the four facilities, who may be contacted directly with questions regarding Site work. The West of 4th Group website at <http://clients.aspectconsulting.com/W4/> includes a downloadable copy of the Deliverables Management Plan that defines the FS schedule. It also contains electronic, downloadable versions of key documents being prepared under the Agreed Order.

4.0 REGULATORY FRAMEWORK

The Site cleanup is being completed in accordance with the Washington State MTCA regulations. The Department of Ecology is therefore a party to the Agreed Order. However, cleanup at the PSC-Georgetown facility must also satisfy federal and state “corrective action” requirements for facilities that manage, or have managed, hazardous wastes. A description of the MTCA and hazardous waste regulations follows.

4.1 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. Ecology investigates any report of property contamination. If the contamination is regarded as presenting a significant threat to human health or the environment, the site is placed on the Hazardous Sites List, and the cleanup process begins.

Public participation is an important part of cleanup under the MTCA process. Participation needs are assessed 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 are provided an opportunity to become involved in commenting on the cleanup process.

Agreed Order No. DE 10402, signed by the West of 4th Group and Ecology in April 2014, is a MTCA Order. The Order defines the limits of the Site and sets out the work that must be completed. An attached Schedule establishes enforceable due dates for FS-related actions and document preparation. The PPP, for example, is a required document under the Order.

The West of 4th Site is not part of the Lower Duwamish Waterway Superfund cleanup site. It is separate. However, since groundwater at the Site moves towards, and discharges into, the Waterway, effective and sustained cleanup of the Waterway requires that “upland” areas such as the West of 4th Site minimize the amount of contamination transported to the river via groundwater.

4.2 HAZARDOUS WASTE REGULATIONS

There are federal and state regulations governing the management of hazardous wastes. 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 Solids Waste amendments that expanded the scope and requirements of RCRA. The goals of RCRA are to protect human health and the environment, to reduce waste and conserve energy

and natural resources, and to reduce or eliminate generation of hazardous waste as quickly as possible. Subtitle C of RCRA established a program to handle wastes from “cradle to grave.” Owners and operators of waste treatment, storage, and/or disposal facilities are required to submit a permit application covering all aspects of design, operation, maintenance and closure of the facility. RCRA requires owners and operators of these facilities to clean up contamination resulting from past and present practices, including practices of previous owners of the facility. These cleanup activities are known as *corrective actions*.

State 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 RCRA hazardous waste management must be at least as stringent as those established by the federal government.

The PSC-Georgetown facility was issued a hazardous/dangerous waste management permit in 1991. The permit was jointly issued by EPA and Ecology. It was a lengthy document, stipulating how the wastes treated and stored at the facility were to be managed. After the facility closed in 2003 the permit was re-issued in a greatly modified form. Today it is only a few pages long, and primarily references PSC’s two State cleanup Orders. Since PSC no longer treats or stores hazardous/dangerous wastes at the Georgetown facility, its permit does not allow the company to operate as a waste management facility at this location.

The ABP, BDC, and CI facilities do not treat, store, or dispose of hazardous/dangerous wastes. None of these companies has a permit to operate as a hazardous/dangerous waste facility.

RCRA and State dangerous waste regulations require public participation throughout all stages of the permitting and cleanup of waste management facilities. These stages include the periods before the permit application is submitted, through the permitting process, and during the life of the permit. During the FS process at the West of 4th Site, PSC’s public participation obligations under the hazardous/dangerous waste regulations will be met by complying with this PPP and MTCA’s public participation requirements.

5.0 SITE COMMUNITY

The West of 4th Site is bounded to the east by 4th Ave. S. and to the west by the Duwamish Waterway. To the north it extends to S. Lucile St. To the south it is bounded by the extent of groundwater contamination, which extends towards S. Front St and approaches Slip 2. The Site is therefore located west of the main Georgetown residential and business area. Properties within the Site area are currently used for residential, commercial, and industrial purposes.

The Georgetown neighborhood has a unique history that has shaped the composition of the current community. Originally occupied by tidal flats and fertile bottom land of the Duwamish River Valley, the area was inhabited by people of the Duwamish Tribe. Development of the Georgetown area was spurred by the construction of rail lines through the neighborhood that connected Seattle to Tacoma, the terminus of the Northern Pacific's transcontinental rail line. Incorporated as a city in 1904, Georgetown was a hub of industry and commercial activity, with ample sources of entertainment for its citizens. Georgetown was annexed by Seattle in 1910 and became part of the ambitious public works projects of the early 1900s, with the straightening of the Duwamish Waterway around 1913, and the filling in of tidal flats with soil from the regraded hills of Seattle. The first powered airplane flight in Seattle took place in Georgetown, initiating a long relationship with the aviation industry. By the late 1940s, industrialization of the area had reduced the residential population substantially.

The construction of the Seattle Design Center and the Seattle Gift Center in the 1970s began a trend away from the industrial nature of Georgetown. By the late 1990s, a number of local artists had taken up residence in the community, taking advantage of affordable housing and studio space. The 2000 census (the latest available by neighborhood) lists the population of Georgetown at a little more than 1,000, with a median age of 37.

In a 2012 Environmental Protection Agency analysis for the Lower Duwamish Waterway Superfund Site, the EPA found that there were large minority communities in Georgetown. Over 12% of community members are Hispanic, 9.8% are Asian (with the majority of Asians being of Chinese descent), and 7.4% are African American. The nearby neighborhood of South Park has a large population of Hispanics (37.3%), African Americans (10.3%) and Asians, with the majority of Asians in the neighborhood being of Vietnamese descent ([EPA 2012](#)). The outreach tools used at the West of 4th Site must be designed to ensure that the diverse communities of Georgetown receive cleanup information that is clearly understandable and invites all community members to participate in the Site's decision-making process. Reaching out to minority community organizations and translating important documents to Spanish, Chinese, and Vietnamese are potential ways to reach this goal.

There is also a need to inform and engage with people who rely on the Duwamish River for its seafood. The federally recognized Muckleshoot and Suquamish tribes have fishing rights within or just north of the Lower Duwamish Waterway. The Duwamish Tribe also remains present in the region and actively fishes the Duwamish River. Past surveys indicate that tribal seafood consumption rates are much higher than rates assumed in EPA's National Toxics Rule. In addition, Asian and Pacific Islanders also consume more fish from the Duwamish than other

ethnic groups. Local fish provide a cheap and accessible source of protein. The Duwamish River Cleanup Coalition is currently conducting a survey of local fishers. This study will help us to better understand the fish consumption rates in the lower Duwamish.

The most-recent City of Seattle Neighborhood Plan for Georgetown lists the following policies and goals for the Georgetown environment:

- Create a community aware of and sensitive to environmental quality, with a recognition and respect for the vital natural environment and ecosystems such as the Duwamish River that survive in Georgetown in the presence of commerce and industry. This community will strive to reduce environmental hazards that threaten the health, safety, and general welfare of Georgetown’s residents and employees.
- Strive to raise overall awareness of environmental quality issues such as air, soil, and groundwater pollution among Georgetown residents, employees, business owners, and property owners.
- Work with other jurisdictions to protect the environmental quality of the Duwamish Watershed.
- Seek ways to monitor and integrate King County International Airport into the Georgetown community, both economically and environmentally.
- Find opportunities to mitigate the impacts of the airport.

5.1 COMMUNITY CONCERNS

Before discussing community concerns, it is worthwhile to summarize how the public has been previously informed about contamination in the West of 4th area. The regulatory agencies have notified the public and local community about past Site developments as outlined below.

(1) EPA, Ecology, and PSC outreach efforts that focused on the PSC-Georgetown facility and related cleanup activities. These efforts began before the facility permit was issued in 1991 and have continued to the present. Prior to 2000, however, outreach was primarily limited to mailed notifications, sent to those individuals who had requested to be on PSC’s “facility mailing list.” Public comment periods were held, but only at those times required by regulation (and usually to announce proposed modifications of the facility permit).

In 2000, members of the Georgetown community and their elected representatives demanded more information about the PSC-Georgetown facility and its cleanup. Members of the community were concerned about the slow pace of the cleanup and health effects that could possibly be related to exposure to site contamination. Some community members also opposed PSC’s continued hazardous waste operations at the Georgetown facility. In response, EPA, Ecology, and PSC began providing more information in newsletter “site updates” and established a local repository for site documents. Ecology also approved a State grant for the Georgetown Community Council to independently oversee PSC’s cleanup activities. The Council used these funds to hire an environmental

consultant, who subsequently reviewed site documents and acted as advisor to the Council. Portions of some monthly Council meetings were devoted to discussions of cleanup progress and issues.

In 2010 Ecology proposed a new PSC-Georgetown Agreed Order to the public. The Order included a Cleanup Action Plan for the eastern portion of PSC's site. During the Order's comment period a public meeting was held at the Georgetown branch of South Seattle Community College.

(2) Ecology outreach efforts that focused on cleanup activities west of 4th Ave. S. Prior to 2008, PSC performed investigations east and west of 4th Ave. S. The company installed monitoring wells throughout this area and tracked groundwater contamination as it migrated to the west and southwest. By 2008, however, it was apparent that groundwater contamination west of 4th Ave. S. was due to releases at properties other than just PSC's. In 2008, Ecology solicited public comment on three MTCA Orders subsequently issued to ABP, BDC, and CI. The three Orders required the companies to perform separate investigations (RIs). In 2012 Ecology conditionally approved the three company-specific RI Reports.

A new, four-party Agreed Order was proposed to the public in January 2014 for review and comment. This West of 4th Order, finalized in April 2014, requires PSC, ABP, BDC, and CI to jointly conduct an FS to evaluate cleanup options for contamination located west of 4th Ave. S. During the Order's comment period a public meeting was held (also at the Georgetown branch of South Seattle Community College).

The public involvement activities conducted since 2000, input from the Georgetown Community Council, and one-on-one conversations with individuals living or working in areas where groundwater is contaminated, have helped Ecology and the West of 4th Group gain a better understanding of the opinions and concerns of the community. The primary concerns expressed to us include:

- potential health risks associated with exposure to groundwater contamination. These concerns have focused on the possibility of indoor air contamination, contamination discharging to the Duwamish Waterway, and the safety of home-grown fruits and vegetables;
- real estate-related issues. These concerns have focused on the possible effects of site contamination and vapor intrusion mitigation on property values, on obtaining loans for property purchase, and on use restrictions transferred during property transactions;
- the constraints associated with Site cleanup. In general, the public has wanted a faster and more aggressive cleanup. Members of the public have urged Ecology to move quickly, protect the Waterway, and reduce Site contaminant concentrations to low levels;

- a continuing need for community involvement. Members of the public have urged Ecology to improve its outreach efforts and to consider other means (such as emails and listserve announcements/updates) of providing Site information to the local community; and,
- reluctance to grant private property access for Site investigations and installation of “permanent,” cleanup-related monitoring wells, mitigation systems, etc. These concerns appear to be linked in many cases to the real estate-related issues discussed above, but also include liability worries and opposition to activities/construction that could interfere with business operations.

6.0 PUBLIC PARTICIPATION

This section includes information for the public regarding opportunities for public involvement and comment, sources for additional information regarding the Site and work being performed under the current Agreed Order, and Site contacts.

6.1 PUBLIC INVOLVEMENT AND OPPORTUNITIES FOR COMMENT

The public may ask Ecology questions, or provide comments to Ecology, at any time. This means interested persons do not need to wait for a formal public comment period to contact Ecology. 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.

The site manager, Ed Jones, may be contacted by phone at (425) 649-4449 or by e-mail at ejon461@ecy.wa.gov. The public may view the FS schedule and listing of documents being prepared under the Agreed Order at the West of 4th Group website at <http://clients.aspectconsulting.com/W4/>. The website also includes PDF versions of the documents the PLPs have prepared for Ecology's review and approval.

Fact Sheets, Comment Periods, Notifications, and Meetings

During specific stages of the cleanup, **fact sheets** are created by Ecology and distributed to addresses within the Site's "affected area." In general, fact sheets will be sent to all addresses within a 1 mile radius of the facility and to interested organizations. These fact sheets explain the stage of cleanup, the Site background, and next-steps in the cleanup process. The fact sheets also provide contact information for the public if they want to comment.

Formal **30-day comment periods** allow interested members of the public an opportunity to comment on new or amended Orders or newly proposed cleanup actions. In these cases, the public is usually asked to comment on a draft document or proposal.

The next formal public comment period for the Site will be held when Ecology proposes a West of 4th Cleanup Action Plan (CAP). This is likely to be in 2016. At that time the public may comment on the draft CAP, FS Reports, and any other Site documents submitted under the Order.

No formal comment periods are likely to be scheduled before that time to solicit public input on specific FS documents. However, as noted above, all key Site documents are available for review and the public may read these plans, technical memoranda, and reports and send comments to Ecology at any time.

At the start of comment periods, a fact sheet (as described above) is created and distributed that contains contact information for submitting comments, and times and locations of public meetings or hearings. The information from these fact sheets is also published in a statewide **Site**

Register. The Site Register is available on Ecology's website (http://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 are typically published in *The Seattle Times*, and placed on the Ecology Public Events Calendar at <http://www.ecy.wa.gov>. These notices are published at the beginning of 30-day comment periods, and are also used to announce public meetings, workshops, open houses, and public hearings. These notices may be placed in more localized or culturally relevant newspapers in addition to *The Seattle Times*.

Public meetings, workshops, open houses, and public hearings are scheduled based on the level of community interest. They are held at locations close to the Site that meet *Americans with Disabilities Act* standards. In the past, meetings and open houses have been held at South Seattle Community College's Georgetown Branch, located on Corson Ave. S. But it is possible that future meetings or other events may need to be held at different locations to accommodate larger numbers of interested persons, or the needs of those persons. Public meetings, workshops, open houses, and hearings are always announced in advance, using a variety of notifications.

The Site's next public meeting or open house is expected to be held in 2016 when Ecology proposes a West of 4th CAP and formal public comment is being solicited. As noted above, though, other meetings, open houses, and workshops may also be scheduled before this time, depending on the level of community interest. For example, the Georgetown Community Council holds monthly meetings and Ecology is available to attend these meetings, at the Council's request, and discuss Site developments. Ecology is also available for smaller meetings with concerned members of the public, should this be requested.

In addition to Fact Sheets, other **flyers** announcing public comment periods, meetings, workshops, etc. may also be posted in various locations throughout the community (e.g., local businesses, schools, libraries) and on the PLPs' and Ecology's websites. Ecology is also willing to extend its outreach efforts by providing updated information to Georgetown community and Duwamish River Cleanup Coalition listserves. It will be up to the administrators of these listserves 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.

6.2 PUBLIC PARTICIPATION GRANTS AND TECHNICAL ASSISTANCE

Citizen groups living near contaminated sites may apply for public participation grants during open application periods. These grants help citizens receive technical assistance in understanding the cleanup process and create additional public participation avenues. Ecology has awarded a Public Participation Grant to the Georgetown Community Council (GCC) for technical assistance with interpretation of technical reports and activities associated with the PSC-Georgetown facility cleanup process. The grant administrator for the GCC is Patty Foley, who can be reached at patty_foley@hotmail.com or (206) 409-9838. For more information about Ecology's public participation grants, go to:

<http://www.ecy.wa.gov/programs/swfa/grants/ppg.html>.

6.3 GENERAL INFORMATION FOR THE PUBLIC

The information below includes general information regarding resources available for obtaining information about cleanup-related activities at the Site.

Mailing List—A mailing list has been developed that includes individuals interested in Site activities and those with property addresses in the Site area. These persons will receive (via first class mail) fact sheets that are developed at different stages of the cleanup. Individuals, organizations, other interested parties, and local, state, and federal governments are added to the mailing list as requested. Any person wishing to be on this mailing list may contact Bridgette Valdez-Kogle, the Site’s Public Involvement Coordinator, at (360) 407-7616 or brva461@ecy.wa.gov.

Community Information Line—PSC maintains a toll-free community information line at (877) 957-8587. Messages received will receive a call back within 48 hours. Note that this information line pertains to activities at PSC only, and not the remaining facilities composing the Site.

Public Repositories—The following two locations contain copies of Site-related documents. The public may review these documents by appointment during regular business hours:

Washington State Department of Ecology
Northwest Regional Office
3190 160th Avenue SE
Bellevue, Washington 98008-5452
(425) 649-7190 (by appointment)

Note: Ecology has copies of **all** documents submitted by the West of 4th Group, and letters that Ecology has sent to the PLPs.

ActivSpace
Maintained by PSC for PSC-related documents
West Seattle
3400 Harbor Avenue SW, Unit 214
Seattle, Washington 98126
(425) 227-6149

During formal comment periods, copies of important documents will also be available at:

South Park Library
8604 8th Ave. S
Seattle, WA
(206) 615-1688

Website Repositories—Documents relating to the Site cleanup may also be accessed, downloaded, and reviewed at the following online repositories:

- West of 4th Group: <http://clients.aspectconsulting.com/W4/>
- Art Brass Plating: <http://aspectconsulting.com/clients/artbrass/>
- Blaser Die Casting: <http://pacificgroundwatergroup.com/clients/blaser/>
- Capital Industries: [http://www.farallonconsulting.com/project/Capital Industries](http://www.farallonconsulting.com/project/Capital%20Industries)

Language Needs – Ecology will try to ensure that all community members have access to important documents, regardless of their language needs. When appropriate, Ecology will translate informational sheets into Spanish and other languages widely spoken in Georgetown.

6.4 PROJECT CONTACTS FOR ANSWERING QUESTIONS FROM THE PUBLIC

For questions about the Site, this PPP, documents available for public comment, upcoming meetings and hearings, or the general cleanup process, the public is encouraged to contact one or more of the individuals listed below:

<p>Department of Ecology Ed Jones Northwest Regional Office 3190 - 160th Avenue SE Bellevue, WA 98008-5452 (425) 649-4449 ejon461@ecy.wa.gov</p> <p>Georgetown Community Group Patty Foley PO Box 80021 Seattle, WA 98018 patty_foley@hotmail.com</p> <p>Georgetown Information Line (877) 957-8587</p> <p>PSC/Stericycle Environmental Solutions William Beck Senior Project Manager Corrective Action Group 18000 72nd Avenue S, Suite 217 Kent, WA 98032-1035 (425) 227-6149 william.beck@stericycle.com</p>	<p>Art Brass Plating Doug Hillman Aspect Consulting 401 Second Avenue S, Suite 201 Seattle, WA 98104 (206) 328-7443 dhillman@aspectconsulting.com</p> <p>Blaser Die Casting Kevin Callan Blaser Die Casting Co. PO Box 80286 Seattle, WA 98108-0286 (206) 767-7800 kevinc@blaser-die.com</p> <p>Capital Industries Jeff Kaspar Farallon Consulting, L.L.C. 975 5th Avenue Northwest Issaquah, WA 98027 (425) 295-0800 jkaspar@farallonconsulting.com</p>
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7.0 AMENDMENTS

This PPP was developed by ABP, BDC, CI, PSC, and Ecology, and complies with MTCA regulations (WAC 173-340-600). It will be reviewed as the FS and CAP progress, and amended if necessary. Ecology provides final approval of the PPP and amendments.

Section 6 above 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 Section 6 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 PPP.