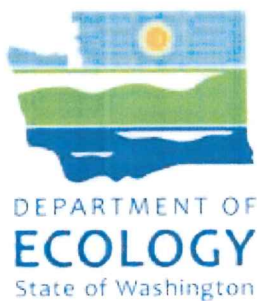


PSC Georgetown Facility Seattle, WA

Public Participation Plan

Prepared by:



October 2011

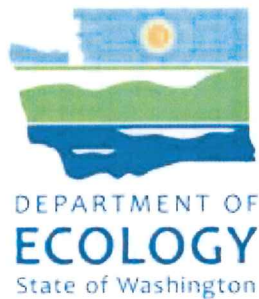
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Getting Involved in the Cleanup of the PSC Georgetown Facility, Seattle, WA

The Washington State Department of Ecology (Ecology) encourages the public to learn about and get involved in decision-making opportunities for the PSC Georgetown Facility located in Seattle, WA. (See location and site maps on page 10.) PSC, formerly Philip Services Corporation, operated a hazardous waste treatment, storage and disposal (TSD) facility at 734 S. Lucile Street in the Georgetown community of Seattle, Washington. The facility was closed in 2003. Site operations, including any cleanup activities, are regulated under a federal permitting process and overseen by the Washington Department of Ecology, which encourages the involvement of community members in the decision-making process for the site.

The Public Participation Plan (Plan) provides an overview of the Plan itself and the federal and state laws that guide the formal cleanup process. This document also outlines the purpose of the Plan, when public notice will occur, the amount of time the public has to comment, where the potentially affected area is located, and ways the public may get involved in providing feedback. It also provides site background, a community profile, and community concerns.

Purpose of the Plan

The Public Participation Plan has three main purposes:

- To promote public understanding of Ecology's and PSC's responsibilities, planning and cleanup activities at the site.
- To serve as a way of gathering information from the public. This information will assist Ecology and PSC conduct the cleanup in a manner that is protective of human health and the environment and sensitive to local community needs and concerns.
- To inform the community living near the site, as well as the general public, about cleanup activities and how to contribute to the decision-making process.

Overview

The cleanup activities at the PSC Georgetown facility fall under the jurisdiction of both Ecology and U.S. Environmental Protection Agency (EPA). For many years in the 1990s, EPA conducted site cleanup and public participation under the Resource Conservation and Recovery Act (RCRA). Oversight of the cleanup process was transferred to Ecology from EPA Region 10 on March 11, 2002. Ecology utilizes the Model Toxics Control Act (MTCA) to govern the cleanup process. These two Acts (RCRA and MTCA) are described in more detail below.

Certain terms are used in the Plan that can have different meanings, depending on the context. For example, the terms "facility" and "site" have somewhat different definitions depending on the set of regulations being applied. For the purposes of this Plan:

- (1) *Facility* is used to refer to the hazardous waste management facility that was located at 734 S. Lucile St. The facility, located on property owned by PSC, was closed in 2003.
- (2) *Site* is used to refer to the area of contamination associated with releases from the facility. This includes groundwater and soil contamination. The PSC site is a large area that extends to the west and southwest past 4th Ave. S. It has been administratively divided into two sub-areas: the east-of-4th site area and the west-of-4th site area.

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- (3) *PSC property* refers to the property owned by PSC, which includes the 734 S. Lucile St. parcel and the 5400 S. Denver St. parcel, previously owned by the Amalgamated Sugar Company (see “Facility Background” below).

The Resource Conservation and Recovery Act (RCRA)

RCRA, an amendment to the Solid Waste Disposal Act, was enacted by Congress in 1976 in order to address the problem of how to safely manage and dispose of huge volumes of municipal and industrial waste generated nationwide. RCRA has been amended several times, including in 1984 with the Hazardous and Solids Waste amendments, which 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 the generation of hazardous waste as expeditiously as possible. Subtitle C of RCRA establishes a program to handle wastes from “cradle to grave”. Owners or operators of TSD facilities are required to submit a permit application covering all aspects of design, operation, maintenance and closure of the facility. RCRA Permits have two parts, A and B, the first of which, Part A, collects general information about the facility. Part B requires the owner/operator to supply detailed and highly technical information about facility operations. RCRA requires owners and operators of RCRA facilities to clean up contamination resulting from past and present practices, including those practices of previous owners of the facility. These cleanup activities are known as corrective action.

RCRA regulations provide for public participation throughout all stages of permitting and cleanup at hazardous waste management facilities, from before the permit application is submitted through the permitting process and the life of the permit.

The Model Toxics Control Act (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 both human health and the environment. Ecology was mandated with implementing MTCA and overseeing cleanups through the state, and has issued regulations and guidance governing those cleanups. These regulations can be found in section 173-340 of the Washington Administrative Code. Ecology investigates any report of property contamination, and if it presents 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. The participation needs are assessed at each site according to the level of public interest and 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.

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.

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Ecology has awarded a Public Participation Grant to the Georgetown Community Council (GCC) for technical assistance with the interpretation of the technical reports and activities associated with the PSC Georgetown facility corrective action process. The grant administrator for the GCC is Patty Foley who can be reached at patty_foley@hotmail.com or (206) 409-9838.

Review of Documents and Project Contacts

Documents relating to the cleanup may be reviewed at the repositories listed on page 8 of this Plan. If individuals are interested in knowing more about the site or have comments regarding the Public Participation Plan, please contact one of the individuals listed below.

<p>Department of Ecology Ed Jones Northwest Region 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>PSC William Beck Senior Project Manager Corrective Action Group 18000 72nd Avenue S, Suite 217 Kent, WA 98032-1035 (425) 227-6149 wbeck@pscnow.com</p> <p>Georgetown Information Line (877) 957-8587</p>
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Facility Background

The PSC Georgetown facility was located at 734 S. Lucile Street, Seattle, Washington in the Georgetown neighborhood of south Seattle. Land use in the vicinity of the Georgetown facility is mixed residential, commercial and industrial, with rail lines and commercial and industrial properties directly adjacent to the facility and residences within approximately 500 feet of the facility. Before closure in 2003, the PSC facility was used for the consolidation, temporary storage and transfer of hazardous chemicals before they were sent to other facilities for recycling or safe disposal.

The 734 S. Lucile Street property was previously owned by Preservative Paint Company, Chemical Processors ("Chempro"), and Burlington Environmental, which later became a wholly owned subsidiary of PSC. The former west field of the RCRA facility, which was, prior to 1982, an unpaved area located near the boundary of the facility was previously used for staining wood shakes and shingles and storing stains, solvents, and wastes. Two underground storage tanks (or "USTs") were located on the east side of the property, to the south and east of the former RCRA facility warehouse.

Twenty-four USTs were installed between 1958 and 1965, and located in the north end of the 734 S. Lucile Street property. The USTs were used by previous owners and operators to store materials such as thinners, solvents and mineral spirits prior to 1970, and by Chempro and Burlington to store solvents,

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cyanide wastes and other materials between 1970 and 1987. The USTs were removed from the facility in 1987.

Oils containing polychlorinated biphenyls (PCBs) were also managed at the RCRA facility, and transformers containing PCB oils were temporarily stored on the western portion of the facility during the period from 1970 to 1989. Under a RCRA permit, jointly issued by US EPA and Ecology in 1991, hazardous waste treatment and storage operations occurred throughout the facility. As part of the operational permit, the facility was required to complete upgrades to facility process units and containment to prevent releases to the environment. Upgrades were completed by 1993, including a concrete cap over the entire facility, concrete berms around all containers, and a self-contained stormwater management system.

Between 1993 and 2002, processes at the facility decreased. The distillation process was shut down in February 1996. Cyanide treatment was discontinued in March 2000. Oxidation treatment and fuel blending were the only processing operations occurring at the facility between March 2000 and December 2002. Operations ended completely in 2002, and the RCRA facility was formally "closed" in 2003.

PSC purchased the neighboring Amalgamated Sugar Company (TASCO) property in 2003 to construct an underground barrier wall (please see "Corrective Action History" below). The TASCO property had been used as an industrial facility for sugar processing from the 1930s until 2003.

Corrective Action History

Corrective action at PSC's RCRA facility pre-dates PSC's ownership. In 1988 a RCRA Order was issued to Chemical Processors (the owner and operator at that time) requiring investigation of subsurface contamination at the facility. Later, in 1991, the order's investigation requirements were transferred into the facility's hazardous/dangerous waste permit. Investigation under the permit then continued for another ten years. During this time PSC operated an SVE system in their north field and paved most of the RCRA facility at 734 S. Lucile Street with thick, high-density concrete. In 2001 a major modification of the permit established new corrective action requirements and an enforceable schedule.

Until 1998 investigation of contamination associated with PSC's facility focused primarily on the 734 S. Lucile Street property and the immediate area. In 1998 PSC sampled groundwater several blocks downgradient and confirmed that contamination had migrated to the west and southwest. In 2000 and 2001 this effort was expanded and groundwater in areas further west and southwest was sampled. PSC subsequently sampled downgradient groundwater all the way to the Duwamish River. Since groundwater contamination above applicable cleanup levels was found in a number of places throughout this area, PSC installed over 50 monitoring wells in downgradient areas between the RCRA facility and the Duwamish River.

PSC completed the investigation of their site in 2003, and presented the results to Ecology in a "Final Comprehensive Remedial Investigation (RI) Report". In February 2005, after the addition of four "addenda" to the Report, Ecology approved the document.

Site Investigation Results

Leaks, spills and wastes from historical operations at the facility resulted in the contamination of soil and groundwater. Numerous environmental investigations were conducted since 1988 in order to determine the nature and extent of the contamination of soil and groundwater at, near, and beyond the facility. The results of these investigations indicated that:

- Soil contamination appears to be limited to the immediate vicinity of PSC's property (note: this includes soil contamination north and east of PSC property in Union Pacific's Argo Yard).
- Groundwater contamination has migrated west and southwest, past PSC's property boundaries, to areas west of 4th Ave. S. There is also groundwater contamination north and east of PSC property in Union Pacific's Argo Yard.
- Dense non-aqueous phase liquid (DNAPL), which is primarily comprised of chlorinated solvents, is likely to be present in deeper groundwater immediately under PSC property.

Contaminants of Concern

Chemicals associated with paint manufacturing, chlorinated solvents, petroleum products and wood treatment (volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), PCBs and metals) have been detected in both soil and groundwater at the site. The primary site groundwater contaminants of concern are:

- chlorinated solvent compounds, such as TCE, and their breakdown products (e.g., vinyl chloride),
- the semi-volatile compound 1,4-dioxane, and
- light petroleum compounds, such as benzene and toluene.

Due to widespread solvent and fuel use, chlorinated solvent compounds and light petroleum compounds are common contaminants at sites in the US.

Exposure Pathways of Concern

Most of the PSC site area has groundwater, but not soil, contamination. This is especially true in areas west of Denver Ave. and south of Lucile St. Because groundwater is not used as a source of drinking water, the primary way that the public may potentially be exposed to the chemicals in groundwater is by inhaling chemical vapors indoors. Volatile chemicals in the gas phase can migrate from shallow groundwater and enter buildings through cracks or other openings in foundations (a phenomenon called "vapor intrusion").

Groundwater in the Duwamish Valley generally moves from the east to the west, discharging into the Duwamish River. The PSC facility is approximately 0.8 miles from the River, but any contamination in discharging groundwater has the potential to adversely affect wildlife and members of the public eating fish and shellfish harvested from the River.

A relatively small part of PSC's site contains soil contamination. PSC's own property is paved, preventing direct human exposure to contaminants in the soil.

Interim Actions (or “Interim Measures”)

Several interim measures were installed by PSC, including a soil vapor extraction system on the property to pull contaminants from the soil, and systems to limit vapor intrusion in 30 residences and businesses in areas of shallow groundwater contamination. The latter systems, similar to those used for keeping out radon gas, depressurize the area under the building and thereby minimize any movement of soil gases indoors.

In addition, in 2004 PSC installed a subsurface barrier wall, which encircles most of the property owned by the company. The wall acts to isolate highly-contaminated groundwater below PSC’s property, thereby preventing it from migrating to the west and southwest.

Cleanup Action Plan

Following completion of the RI PSC began a study of possible cleanup options for the eastern portion of the site. A Feasibility Study (FS) Report along with five technical memoranda were prepared from 2005 – 2007¹. Once Ecology approved the FS Report a final Cleanup Action Plan for the areas east of 4th Avenue South was developed and approved in 2010. The Cleanup Action Plan (CAP) for the eastern part of the site includes the following key elements:

On the PSC property:

Action	Status
Subsurface barrier wall	Constructed 2004
Groundwater recovery and pretreatment system	Constructed and commenced operations in 2004 to present and into future
Partial dewatering of shallow soils	2011 - 2012
Soil Vapor Extraction throughout site	1994 – 2004 and 2012-2013
Active/enhanced in situ groundwater bioremediation (ISB)	Planned to commence in 2013. To be conducted for 4 years
Final Capping (Paving)	2011-2012
Institutional Controls and financial assurance	2004 and into future

In areas off the PSC property:

Action	Status
Monitored Natural Attenuation of groundwater	Beginning in 2010 to present and into future
Vapor Intrusion Assessment and Monitoring Actions	Beginning in 2002 to present and into future
Soil vapor extraction system – UPRR Argo Yard	2012 - 2013
Excavation & off-site disposal of soil - UPRR Argo Yard	2012

¹ The Feasibility Study was titled “Site Wide,” though it focused, as noted above, on the eastern portion of PSC’s site.

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West of 4th Ave.

In 2008, three additional PLPs signed legal orders with Ecology to conduct separate MTCA investigations in areas west of 4th Avenue South. These PLPs are: Art Brass Plating, Capital Industries, and Blaser Die Casting. The three companies are located in areas that are generally “downgradient” of the PSC facility. By this we mean that groundwater in areas near the PSC facility moves in the general direction of these companies on its way to discharging into the Duwamish Waterway. Chemical (solvent) releases from the three companies have led to the contamination of soils and groundwater. More information about these PLPs and their individual orders with Ecology can be obtained by contacting Ed Jones at the information listed on page 4.

Cleanup of the western part of PSC’s site is therefore complicated by the presence of contamination associated with three other PLPs. In July 2011 these PLPs submitted draft RI Reports to Ecology, describing the nature and extent of contamination they have been investigating. Once the three Reports have been finalized and approved, the three PLPs and PSC can begin evaluating cleanup options for the area.

Community Background

The Georgetown neighborhood has a unique history which 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. The development of the Georgetown area was spurred by the construction of rail lines through the neighborhood connecting Seattle with 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 the 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 1940’s, the industrialization of the area had reduced the residential population substantially.

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

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

- 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; and reduces 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.

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- Seek ways to monitor and integrate King County International Airport in the Georgetown community, both economically and environmentally.
- Find opportunities to mitigate the impacts of the airport.

Community Concerns

The public involvement activities conducted since July 2000 have helped Ecology and PSC gain a better understanding of the opinions and concerns of the community. The primary concerns of the community appear to center around potential health risks associated with exposure to groundwater contamination and the constraints for site cleanup. Concerns and opinions expressed by community members include: concerns about how contamination from the facility may affect their health and the environment; the need to expedite site cleanup; and, the need to improve community involvement.

Information for the Public

- A **mailing list** has been developed that includes those individuals interested in site activities and those with property addresses within the site area. These persons will receive (via first class mail) fact sheets when they are developed at different stages of the cleanup. Additionally, individuals, organizations, local, state, and federal governments, and any other interested parties will be added to the mailing list as requested. Other interested persons may request to be on the mailing list at any time by contacting Ed Jones (see contact information on page 4).
- **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.
- **Public Repositories** are locations where site documents may be reviewed. The following locations contain copies of site-related documents that have gone through the public review process:

WA Department of Ecology
Northwest Regional Office
3190 160th Ave. SE
Bellevue, WA 98008-5452
Tel: (425) 649-7190 (by appointment)
<http://www.ecy.wa.gov/programs/hwtr/foia/index.html>

Note: Ecology has copies of **all** documents submitted by PSC, and letters the Department has sent to the company.

ActivSpace
West Seattle
3400 Harbor Avenue SW, Unit 214
Seattle, WA 98126
(425) 227-6149

Opportunity to Comment

- During specific stages of the cleanup **fact sheets** are created by Ecology, then distributed to individuals on the mailing list. These fact sheets explain the stage of cleanup, the site background, and what happens next in the cleanup process. They also ask for comments from the public.
- A formal **30-day comment period** allows interested parties time to comment on the cleanup process. These periods are generally initiated when a new Order is issued, or when an Order or important document such as the Cleanup Action Plan requires substantial revision. In these cases the public is asked to comment on a draft document or proposal. A fact sheet is created that contains contact information about where to submit comments and where and when any public meetings or hearings will be held. The information from these fact sheets is also published in a statewide **Site Register**, which is sent to those who request to be on that mailing list. Persons interested in receiving the Site Register should contact Linda Thompson of Ecology at (360) 407-6069 or e-mail ltho461@ecy.wa.gov.
- **Display ads or legal notices** are published in *The Seattle Times* and on Ecology's Public Events Calendar <http://www.ecy.wa.gov> to inform the general public. The notices are published at the beginning of the 30-day comment period. These are also used to announce public meetings and workshops or public hearings.
- **Public meetings, workshops, open houses, and public hearings** are held based on the level of community interest. During formal comment periods, if ten or more persons request a public meeting or hearing based on the subject of the public notice, Ecology will hold a meeting or hearing and gather comments. These meetings, workshops or hearings will be held at a location that meets ADA standards and is close to the site. They may be held away from the site if it is necessary to accommodate large numbers of interested persons. These events are announced using the same methods as display ads or legal notices.

Other meetings, open houses, and workshops may also be held. Again, this will depend on the level of community interest. When such events are held, they will be announced via methods that guarantee that those most interested will be invited and have sufficient preparatory time to attend.

- **Flyers** may also be made available in various locations throughout the community (e.g., postings at local businesses, schools, libraries, etc.) to announce public comment periods, meetings, workshops, etc.
- **The public may ask questions or provide comments to Ecology at any time. That is, interested persons need not wait for a formal public comment period to contact Ecology.** The site manager, Ed Jones, may be contacted by phone (425-649-4449) or by Email (ejon461@ecy.wa.gov).

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Public Participation Activities and Timeline

Cleanup in the eastern portion of the PSC site is currently governed by an Agreed Order and Cleanup Action Plan. Unless one of these two documents requires substantial revision, there will be no regulatory need for a formal public comment period in the future. Nevertheless, during implementation of the Cleanup Action Plan, and later, following implementation, PSC plans the following activities:

- An Annual Public Notice will be mailed to mailing list recipients annually in June of each year. The public notice will provide an update on conditions and the progress of final remedy implementation, and any other significant findings.
- Manometer reminder cards will be sent to VIAM mailing list recipients quarterly. The cards will provide instructional information on checking the installed manometers in their buildings to help ensure that the installed air handling systems are operating to vent the systems.
- PSC maintains a toll-free number Information Line where residents may leave a message or questions regarding the project. All calls are answered as soon as possible and provide a good opportunity for the project team to receive ongoing information about community concerns.

Cleanup in the western portion of the PSC site is dependent on the timing of actions being taken by PLPs besides PSC. Three PLPs are currently conducting individual RIs in this area. Once these RIs have been completed, a feasibility study will need to be performed to evaluate possible cleanup alternatives. A new Order will also need to be issued that establishes requirements for the feasibility study and the drafting of a west-of-4th Cleanup Action Plan.

When a draft version of a west-of-4th Order has been prepared, public notice will be given, a fact sheet will be prepared, and a public comment period will begin. Ecology may also choose to hold public meetings, workshops, open houses, and/or public hearings at that time, based on the level of community interest. No date has yet been established for this comment period, but Ecology anticipates that it will not occur until the summer of 2012, at the earliest.

Answering Questions from the Public

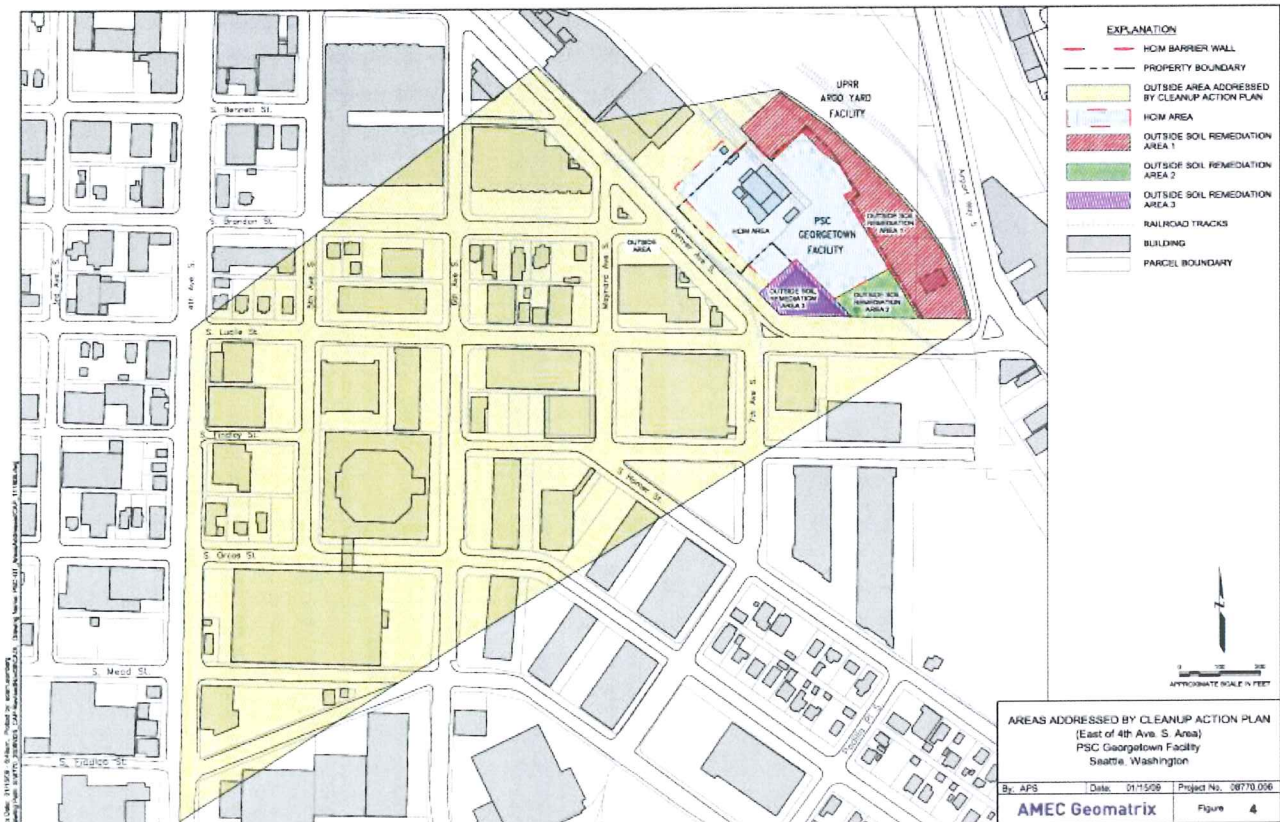
If you have questions about fact sheets, documents available for public comment, meetings and hearings, or about the general cleanup process, you are encouraged to contact one of the individuals listed on page 4.

Amendments

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



Location Map
www.historylink.org



Site Map