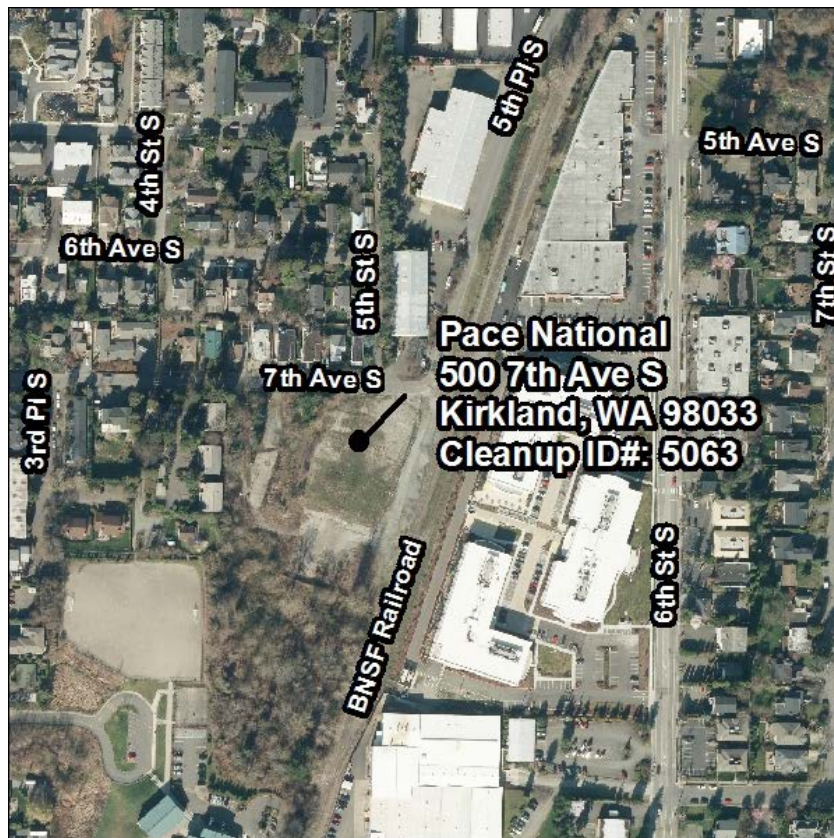


**ULTRA Corporation
Former Pace National Site**

Public Participation Plan



KIRKLAND, WASHINGTON

January 2012

**Prepared by
Washington State Department of Ecology
3190 160th Avenue SE
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1.0 INTRODUCTION

The Washington State Department of Ecology (Ecology) has developed this public participation plan under the **Model Toxics Control Act (MTCA)**, to promote meaningful community involvement before starting clean up of contamination at the Ultra Corporation, former Pace National site, located at 500 7th Avenue South in Kirkland, Washington.

This plan outlines and describes the tools and approaches that Ecology uses to inform the public about site activities and identifies opportunities for the community to become involved. This plan aims at addressing potential community concerns regarding the cleanup action and defines the types of public participation activities that will take place as a part of the cleanup process. It is based on Ecology's Model Toxic's Control Act (MTCA) regulations (WAC 173-340-600 "Public Participation"). Ecology is committed to an open dialogue with the community to ensure that interested parties receive information as well as provide input during the decision-making process.

In 2011, Ecology and Ultra Corporation negotiated a legal agreement called a Consent Decree that formally describes their working relationship and outlines the scope of work that Ultra Corporation will implement. Ultra Corporation will complete the cleanup actions at this site under a Cleanup Action Plan. The tasks are to implement the proposed Cleanup Action Plan with the Compliance Monitoring Plan and with Ecology's oversight and approval.

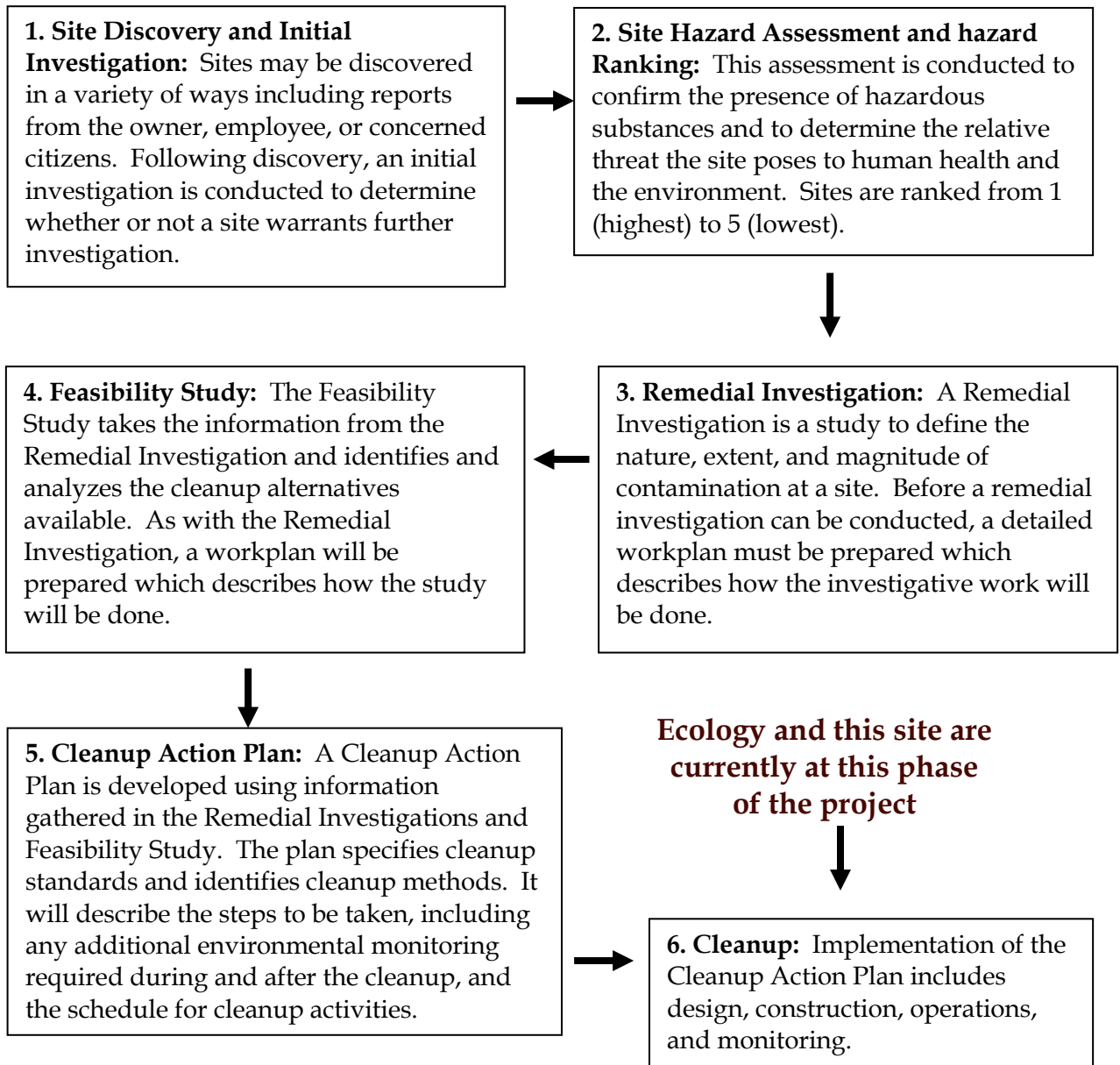
This Public Participation Plan applies to the following four key documents concerning cleanup and public comment at the Pace National Site:

1. Draft Consent Decree to implement the Cleanup Action Plan.
2. Draft Cleanup Action Plan (CAP) to complete cleanup tasks at the site prepared by Sound Earth Strategies (SES) April 13, 2011.
3. Draft Remedial Investigation/Feasibility Study prepared by SES dated December 13, 2010 including interim actions (cleanup task results), supplemental remedial investigation results (2009-2010), pilot testing results (2009-2010), and proposed cleanup alternatives.
4. SEPA Environmental Checklist prepared by SES and dated January 31, 2011 and Ecology's determination of non-significance to implement this CAP dated January 17, 2012.

A comment period will provide opportunities for the public or interested parties to review, ask questions, and submit comments on these documents.

2.0 STEPS IN THE CLEANUP PROCESS

The MTCA rules detail each step in the cleanup process to ensure that cleanups are thorough and protective of human health and the environment. The chart below defines these steps and how they apply to the project site. Legal documents such as “**Agreed Orders**” or “**Consent Decrees**” further define some of the steps and associated time frames.



**3.0 PROJECT SCHEDULE FOR PACE NATIONAL SITE
SEQUENCE OF TECHNICAL AND PUBLIC INVOLVEMENT ACTIVITIES**

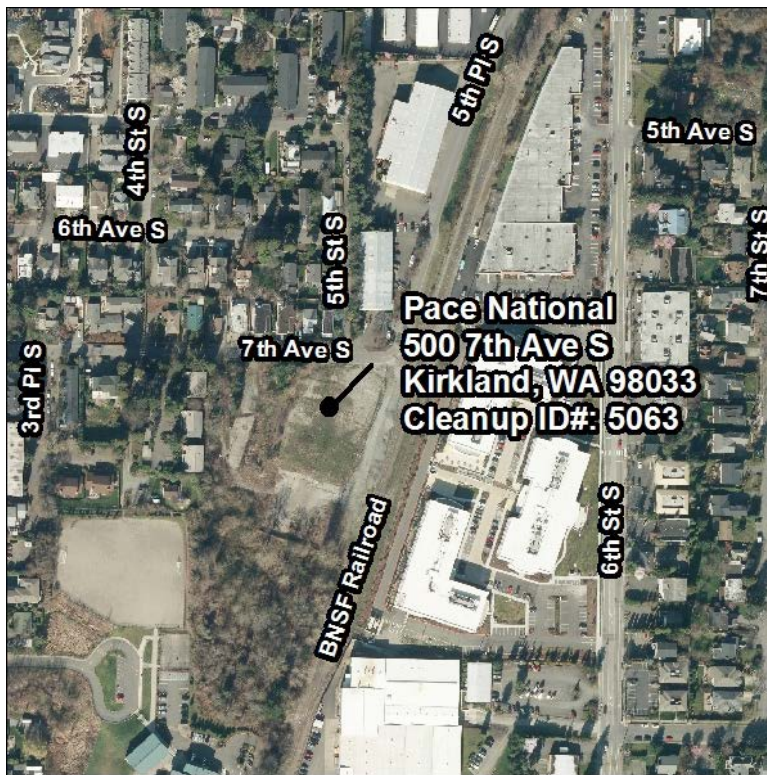
Schedule	Activity	Public Participation/ Communications Activity
January 2012	Prepare documents	<ul style="list-style-type: none"> ◆ Community council/interest group briefings ◆ The fact sheet was mailed the week of 1/23/12 ◆ Documents for public review: Consent Decree, CAP, RI/FS, SEPA-DNS and this Public Participation Plan (PPP)
January 27 - February 27, 2012	Public Comment Period	<ul style="list-style-type: none"> ◆ The Public comment period for the draft Consent Decree, draft Cleanup Action Plan, draft Remedial Investigation/Feasibility Study Report, draft SEPA Environmental Checklist and Determination, and draft Public Participation Plan. ◆ February-March 2012: Review and evaluate public comments and revise document(s) if appropriate. ◆ April 2012: Ecology prepares responses to comments and the Responsiveness Summary.
March 2012-2015-17	Implement Consent Decree	<ul style="list-style-type: none"> ◆ Implement Cleanup Action Plan (CAP). ◆ Conduct Compliance Monitoring Plan. ◆ Prepare Progress Reports. ◆ Prepare Closure Report ◆ Request Notice of Completion.
Estimated 2015-17	Public Comment Period	<ul style="list-style-type: none"> ◆ Write a fact sheet for the Notice of Completion and Ecology request to close the Consent Decree and delist site from state Hazardous Sites List. ◆ Conduct a Public Comment Period.
Estimated 2015-17	Close Consent Decree	<ul style="list-style-type: none"> ◆ Finalize Notice of Completion, close Consent Decree and Delist the Site from the state's Hazardous Sites List.

4.0 PACE NATIONAL SITE LOCATION & BACKGROUND

The Ultra Corporation, former Pace National site (Pace Site) represents a five acre commercial/industrial property set in a mixed residential, commercial, and industrial neighborhood in central Kirkland, approximately 0.5 mile south of downtown. The Pace Site is located south of commercial buildings, west of the Burlington Northern Santa Fe Railway tracks and Google Campus, north of undeveloped wooded property and the Lakeview Elementary School, and east of condo/apartments and single family residential homes.

4.1 Site Location and Map

Ultra Corporation, former Pace National facility, also known as Pace International is located at 500 7th Ave South in Kirkland, King County, Washington. The Pace Site is listed in Ecology's Confirmed and Suspected Contaminated Sites List and in Ecology's databases under **Facility Site ID # 2159** and the Cleanup ID #5063.



4.2 Site Background and History

Historically, the area was residential from the early 1900s until the early 1960s when the property was converted to commercial/industrial application. The Seattle Door Company built an office building in the northeast corner of the

property in 1963. The Tye Lumber Company stored wood products for builders until Pace National (Pace) purchased the property in 1969.

Pace operated a specialty chemical mixing and packaging facility at the northern portion of the site from 1971 to approximately 1990. Pace had a large warehouse, office building, and specific service areas. The service areas included an underground storage tank area where petroleum and chemicals were stored, an above ground storage tank with oil/water separator, a railroad unloading area, and a drum storage area. The storage tank area serviced 14 underground storage tanks containing regulated and unregulated substances such as alcohols, oils, petroleum, and proprietary mixtures used to formulate products.

In 1990, Pace closed its business and the underground storage tanks and associated piping were closed and removed by SRH Environmental Management. SRH Environmental Management reported that the tanks were in generally good condition. From 1990 to 2005, the property was used for retail storage. In 2006, the building was demolished, and the property was graded and fenced. Currently, the property remains vacant and fenced.

4.3 Site Investigations and Cleanup

From 1990 to present, several remedial investigations and five interim cleanup actions have been conducted at the site. In addition to the removal of the 14 underground storage tanks, soil and groundwater testing has been conducted throughout the site. Contaminated soils, when discovered, were removed in 1990, 1993, 2003, and 2006. In addition to these soil excavations, ground water was treated by “in place” or “in situ” methods to clean up or reduce contaminants in groundwater.

Additional remedial investigations tested soil and ground water for multiple contaminants of concern. These included volatile organic and semi-volatile organic compounds (VOC and SVOC) also called base-neutral organic compounds, gasoline, diesel and oil petroleum hydrocarbons, herbicides and pesticides including organochlorine pesticides, and metals.

Most of the results were below MTCA cleanup levels or below laboratory reporting limits, with the exception of perchloroethene (PCE), a common solvent, and mineral spirits identified as gasoline range petroleum hydrocarbon found in soil. These substances were discovered in 2005, but have since been cleaned up and no longer represent a risk.

Several groundwater investigations have showed that almost all substances tested were below MTCA cleanup levels or below laboratory reporting limits, except for

vinyl chloride which exceeded the MTCA Method A cleanup level of 0.2 parts per billion.

In 2010, a supplemental investigation was conducted in order to address remaining data gaps. This investigation included areas down-gradient and west of the west property line and along 7th Avenue South right-of-way.

Results from the supplemental investigation showed no significant detections of chemicals of concern in soil and groundwater. No vinyl chloride was detected above laboratory reporting limits west of the property line. No new hazardous substances or chemicals of concern were detected in soil or groundwater.

Monitoring since December 2006 to present has shown that vinyl chloride is the one remaining chemical of concern at this site and occurs only in groundwater.

4.4 Current Site Conditions and Proposed Cleanup Action

The vinyl chloride (VC) concentration in groundwater has significantly decreased since 2006 during the last five years. The lateral extent of the VC plume has decreased more than 50 percent comparing 2006 to 2011 results (see RI/FS Report figures 17-18).

The proposed Cleanup Action Plan (CAP) is to clean up the VC using Monitored Natural Attenuation (MNA) with compliance monitoring to confirm that the groundwater at this site has been restored to MTCA cleanup levels. Monitored Natural Attenuation uses naturally occurring biological decay processes to reduce or destroy contaminants to natural substances that are not hazardous.

5.0 PUBLIC PARTICIPATION

The purpose of this Public Participation Plan is to promote public understanding and participation in the cleanup activities planned for this site. This section of the plan addresses how Ecology will share information and receive public comments and community input for the site.

Ecology urges the public to become involved in the cleanup process. Information will be provided regularly to offer opportunities to review materials and provide comments. This plan is intended to be a flexible working document that will be updated as community concerns emerge and/or more information becomes available during the course of cleanup.

To arrange for a briefing with project staff, ask questions, or provide comments on the plan or other aspects of the cleanup, please contact one of the persons listed below.

For technical questions, please contact:

Maura S. O'Brien, PG/HG#869
Professional Geologist/Hydrogeologist , Site Manager
Washington State Department of Ecology
Toxics Cleanup Program - Northwest Regional Office
3190 160th Ave SE
Bellevue, WA 98008
Phone: (425) 649-7249
E-mail: maura.obrien@ecy.wa.gov

For Community Involvement questions, please contact:

Nancy Lui, Community Outreach
Washington State Department of Ecology
Toxics Cleanup Program - Northwest Regional Office
3190 160th Ave SE
Bellevue, WA 98008
Phone: (425) 649-7117
E-mail: nancy.lui @ecy.wa.gov

5.1 Goal of this Public Participation Plan

MTCA states that public participation is intended to encourage a coordinated and effective public involvement tailored to the public's needs at a particular facility. The goals of this plan are:

- To identify people and organizations with an interest or potential interest in the site.
- To promote public understanding and to identify community concerns related to the following documents for the former Pace National Site:
 - Legal Agreement - Consent Decree
 - Draft Cleanup Action Plan (CAP)
 - Draft Remedial Investigation/Feasibility Study (RI/FS) Report
 - State Environmental Policy Act (SEPA) Environmental Checklist and Determination
 - Public Participation Plan *continued...*

- To encourage interactive communication and collaboration among Ecology, Ultra Corporation/former Pace National potentially liable persons, and the community.
- To meet the public participation requirements under MTCA regulations.

5.2 Roles and Responsibilities

Ecology maintains overall responsibility and approval authority for the activities outlined in this plan in accordance with MTCA requirements. Ecology conducts public comment periods as required by MTCA, which include receiving comments, making decisions, and preparing responsiveness summaries for public comments received, and keeping the public informed.

5.3 Public Outreach Activities

A 30-day public comment period will be scheduled for each phase of the project. A formal public notice for the comment period will include the following:

- a. A fact sheet will be mailed to the impacted community and surrounding areas.
- b. A newspaper advertisement will be placed in the Kirkland Reporter for January 27, 2012 publication.
- c. A notice will be published in Ecology's Site Register on January 26, 2012 and Ecology's Public Calendar.
- d. All public documents will be available on Ecology's website for public review, and at public locations such as libraries.

State Environmental Policy Act

The **State Environmental Policy Act (SEPA)** is applicable to this site during implementation of the proposed Cleanup Action Plan. The SEPA checklist evaluates the environmental impacts of the proposed cleanup tasks to be conducted at this site. Ecology has reviewed this checklist and determined that implementing this cleanup will cause no significant adverse environmental impacts (Determination of Non Significance). The SEPA checklist and Determination of Non Significance are ready for public review.

5.4 Formal Public Comment Period

Comment periods are the primary method Ecology uses to get feedback from the public on proposed cleanup decisions, which Ecology presents as draft documents. Comment periods usually last for 30 days and are required at key points during the investigation and cleanup process before final decisions are made. During a comment period, the public can comment in writing. Verbal comments are taken if a public hearing is held. After the formal comment period, Ecology reviews all comments received and may respond in a document called a Responsiveness Summary.

Ecology will consider the need for changes or revisions to draft documents based on input from the public. If significant changes are made, then a second comment period may be held. If no significant changes are made, then the draft document(s) will be finalized.

5.5 Public Meetings and Hearings

Public meetings may be held at key points during the cleanup process. Ecology may also offer public meetings for actions expected to be of particular interest to the community. Also, if ten or more people request a public meeting or hearing during the 30 day comment period, Ecology will hold a public meeting for the purpose of taking comments on the draft documents.

5.6 Information Repositories

Information repositories are convenient places where the public can go to read and review site information. The information repositories are often at libraries or community sites to which the public has access. During the comment period, the site documents will be available for review at each repository that is listed below. The entire site file is available for review at Ecology's Northwest Regional Office by appointment. For special accommodations or translation assistance, please contact Nancy Lui at nancy.lui@ecy.wa.gov or at (425) 649-7117. Please indicate you would like assistance with the "**Pace National**" site.

5.7 Site Register and Public Events Calendar

King County Library- Kirkland 308 Kirkland Ave. Kirkland, WA 98033 (425) 822-2459	Washington State Department of Ecology 3190 160th Ave., S.E. Bellevue, WA 98008 Call to schedule an appointment: Sally Perkins (425) 649-7190 (425) 649-4450 FAX E-mail: sally.perkins@ecy.wa.gov Hours: Tuesday - Thursday 8 AM - 12:00 PM and 1:00 - 4:30 PM
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Ecology's Toxics Cleanup Program uses a Site Register and web-based Public Involvement Calendar to announce all of its public meetings and comment periods as well as additional site activities. To receive the Site Register in electronic or hard copy format, contact (360) 407-7000.

Ecology's Site Register website

http://www.ecy.wa.gov/programs/tcp/pub_inv/pub_inv2.html

Ecology's Public Involvement Calendar website

<http://apps.ecy.wa.gov/pubcalendar/calendar.asp>

5.8 Mailing List

Ecology has compiled and maintained a list of interested parties, organizations, and residents living near the cleanup site. This list will be used to disseminate information via mail (fact sheets, site updates, public notices, etc.). If you are not on the mailing list for this site and wish to be added, please contact Nancy Lui at nancy.lui@ecy.wa.gov or at 425-649-7117. In the subject line, please indicate "Pace National Site" mailing list.

5.9 Ecology Website

Information on the cleanup work at Pace National Site is also available online:
<https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=5063>

6.0 PUBLIC PARTICIPATION AND GRANTS AND TECHNICAL ASSISTANCE

Additionally, 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 avenues for public participation.

Information on the guidelines and application for Public Participation Grants may be found at Ecology's website:

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

Ecology currently does not have a citizen technical advisor for providing technical assistance to citizens on issues related to the investigation and cleanup of the Site. Please call Ecology's Pace National site manager Maura O'Brien, if you have questions at maura.obrien@ecy.wa.gov or 425-649-7249.

6.1 Public Participation Plan Amendments

The plan was developed by Ecology and complies with the MTCA regulations (Chapter 173-340 WAC). It will be reviewed as cleanup progresses and may be amended if necessary. Amendments may be submitted to Ecology's site manager, Maura O'Brien, for review and consideration. Ecology will determine final approval of the plan as well as any amendments.

APPENDIX A - GLOSSARY

Cleanup: The implementation of a cleanup action, or interim action.

Cleanup Action: means any remedial action, except interim actions, taken at a site to eliminate, render less toxic, stabilize, contain, immobilize, isolate, treat, destroy, or remove a hazardous substance that complies with WAC 173-340-350 through 173-340-390.

COCs: Chemicals of Concern means hazardous substances that are of particular concern at this site.

Comment Period: A time period during which the public can review and comment on various documents and proposed actions. For example, a comment period may be provided to allow community members to review and comment on proposed cleanup action alternatives and proposed plans.

Consent Decree: A legal document approved and issued by a court which formalizes an agreement reached between the state and potentially liable persons (PLPs) on the actions needed at a site. A decree is subject to public comment. If a decree is substantially changed, an additional comment period is provided.

Containment: A container, vessel, barrier, or structure, whether natural or constructed, which confines a hazardous substance within a defined boundary and prevents or minimizes its release into the environment.

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

Data Gap Work Plan: Work plan outlines tasks to investigate and characterization soil and groundwater information necessary to complete Remedial Investigation (RI) and Feasibility Study (FS).

Environment: Any plant, animal, natural resource, surface water (including underlying sediments), ground water, drinking water supply, land surface (including tidelands and shorelands) or subsurface strata, or ambient air within the state of Washington.

Facility: Any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly-owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, vessel, or aircraft; or any site or area where a hazardous substance,

other than a consumer product in consumer use, has been deposited, stored, disposed or, placed, or otherwise come to be located.

Facility Site ID #: Site specific number assigned by Ecology for the Ecology known and suspected contaminated sites database.

Feasibility Study: The Feasibility Study takes the information from the Remedial Investigation and identifies and analyzes the cleanup alternatives available. As with the Remedial Investigation, a workplan will be prepared which describes how the study will be done.

Interim Action: Any remedial action that partially addresses the cleanup of a site. It is an action that is technically necessary to reduce a threat to human health or the environment by eliminating or substantially reducing one or more pathways for exposure to a hazardous substance at a facility; an action that corrects a problem that may become substantially worse or cost substantially more to address if the action is delayed; an action needed to provide for completion of a site hazard assessment, state remedial investigation/feasibility study, or design of a cleanup action.

Model Toxics Control Act (MTCA): Refers to RCW 70.105D approved by voters in the state of Washington in November 1988. The implementing regulation is WAC 173-340 and was amended in 2001.

Public Notice: At a minimum, adequate notice mailed to all persons who have made a timely request to Ecology and notice to persons residing in the potentially affected vicinity of the proposed action; mailed to appropriate news media; published in the local (city or county) newspaper of largest circulation; and the opportunity for interested persons to comment.

Public Participation Plan: A plan prepared under the authority of WAC 173-340-600 to encourage coordinated and effective public involvement tailored to the public's needs at a particular site.

Remedial Investigation: A Remedial Investigation is a study to define the nature, extent, and magnitude of contamination at a site. Before a remedial investigation can be conducted, a detailed workplan must be prepared which describes how the investigation work will be done.

Responsiveness Summary: A compilation of all questions and comments into a document open for public comment and their respective answers/replies by

Ecology. The responsiveness summary is mailed, at a minimum, to those who provided comments, and its availability is published in the Site Register.

State Environmental Policy Act (SEPA): State Environmental Policy Act is the Washington State regulation to inform and involve the citizens and businesses about proposed work that may involve investigation and/or remedial actions on land, water, or air within Washington State.

Site Discovery and Initial Investigation: Sites may be discovered in a variety of ways including reports from the owner, and employee, or concerned citizens. Following discovery, an initial investigation is conducted to determine whether or not a site warrants further investigation.

Site Hazard Assessment and Hazard Ranking: This assessment is conducted to confirm the presence of hazardous substances and to determine the relative threat the site poses to human health and the environment. Sites then are ranked from 1 (highest) to 5 (lowest).

Site Register: Publication issued every two weeks of major activities conducted statewide related to the study and cleanup of hazardous waste sites under the Model Toxics Control Act. To receive this publication, please call (360) 407-7200.

Underground Storage Tank (UST) area: An area at a property that contains underground storage tank or tanks and connected underground piping for the storage and containment of liquids and are defined in the rules adopted under Chapter 90.76 RCW. Frequently these liquids may be a fire hazard and for public safety they are stored underground.