



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

## **Public Participation Plan**

### **South State Street Manufactured Gas Plant**

**Bellingham, WA**

---

*Facility Site ID: 2865*

*Cleanup Site ID: 4606*

October 2018

Publication 18-09-174

## Publication and Contact Information

This document is available on the Department of Ecology's South State Street  
Manufactured Gas Plant website at: <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=4606>

For more information contact:

Ecology – Bellingham Field Office  
913 Squalicum Way  
Unit 101  
Bellingham, WA 98225  
360-255-4400

Ecology - Northwest Regional Office  
3190 160<sup>th</sup> Avenue SE  
Bellevue, WA 98008-5452  
425-649-7000

Washington State Department of Ecology – [www.ecology.wa.gov](http://www.ecology.wa.gov)

- Headquarters, Olympia 360-407-6000
- Northwest Regional Office, Bellevue 425-649-7000
- Southwest Regional Office, Olympia 360-407-6300
- Central Regional Office, Union Gap 509-575-2490
- Eastern Regional Office, Spokane 509-329-3400

*To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 360-255-4400 or visit <https://ecology.wa.gov/accessibility>. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.*

**Public Participation Plan  
South State Street Manufactured Gas Plant  
Bellingham, WA**

---

*Facility Site ID: 2865  
Cleanup Site ID: 4606*

Washington State Department of Ecology  
Northwest Regional Office  
Toxics Cleanup Program  
Bellevue, Washington

*This page is purposely left blank*

# Table of Contents

	<u>Page</u>
List of Figures .....	vi
Public Involvement in Site Contamination Cleanup Process .....	1
Site contacts .....	1
Public Participation Grants .....	1
Washington’s Cleanup and Environmental Laws .....	2
Model Toxics Control Act (MTCA) .....	2
State Environmental Policy Act .....	3
Site Information .....	4
Background and location .....	4
Contamination .....	7
Cleanup plans .....	7
Area community .....	7
Public Participation Activities .....	9
How we share information with the community .....	9
How to share information with us .....	11
Plan Amendments/Updates .....	12

# List of Figures

Page

## Figures

Figure 1: Steps in Washington's Cleanup Process .....	3
Figure 2: South State Street Manufactured Gas Plant cleanup site location.....	4
Figure 3: Manufactured gas plant facing east, Circa 1950 .....	4
Figure 4: Concrete gas-holding tank near South State Street, upper Boulevard Park .....	5
Figure 5: Small brick building near South State Street, upper Boulevard Park .....	5
Figure 6: Historic aerial view of cleanup site with surrounding log booms, Circa 1950 .....	5
Figure 7: Aerial view of cleanup site Upland and Marine Units .....	6
Figure 8: Groundwater sampling on Site, June 2016.....	7
Figure 9: Cleanup site location in Bellingham's South Hill Neighborhood .....	8

## **Public Involvement in Site Contamination Cleanup Process**

The City of Bellingham (City) and Puget Sound Energy (PSE) are addressing contamination at the South State Street Manufactured Gas Plant (Site) with Washington State Department of Ecology (Ecology) oversight. The contamination is due to historic industrial operations and is present at potentially harmful levels. As a result, it must be addressed under Washington's cleanup law, the Model Toxics Control Act.

Ecology developed this public participation plan (plan) to promote meaningful community involvement in the Site cleanup process. The plan describes ways Ecology will inform the public about cleanup activities, and identifies how and when the public can get involved.

### **Site contacts**

#### **Ecology**

Department of Ecology  
Bellingham Field Office  
913 Squalicum Way, Unit 101  
Bellingham, WA 98225

John Guenther  
Site Manager  
john.guenther@ecy.wa.gov  
360-255-4381

Ian Fawley  
Public Involvement Coordinator  
ian.fawley@ecy.wa.gov  
360-255-4382

#### **City**

City of Bellingham  
210 Lottie Street  
Bellingham, WA 98225

Gina Austin  
Project Engineer  
gaustin@cob.org  
360-778-7000

#### **PSE**

Puget Sound Energy  
10885 NE 4<sup>th</sup> Street  
PO Box 97034  
Bellevue, WA 98009-9734

Greg Andrina  
Project Coordinator  
greg.andrina@pse.com  
425-456-2228

### **Public Participation Grants**

Qualified individuals and not-for-profit public interest organizations are eligible to apply for a Public Participation Grant (PPG) from Ecology. For contaminated sites, these funds may be used to:

- Contract with an expert to help interpret technical jargon and information.
- Conduct activities that enhance the public's understanding of, and participation in, the site cleanup process.

For more information about PPGs, please contact Lynn Gooding at 360-407-6062 or [lynn.gooding@ecy.wa.gov](mailto:lynn.gooding@ecy.wa.gov). You may also visit Ecology's [Public Participation Grant website](#).<sup>1</sup>

## Washington's Cleanup and Environmental Laws

Ecology derives its authority to require cleanup of contamination from the state Model Toxics Control Act (MTCA; [Chapter 70.105D Revised Code of Washington \(RCW\)](#)<sup>2</sup>). The MTCA provides requirements for contaminated site cleanup in Washington State and sets standards to ensure the cleanup protects human health and the environment. Standards for sediment cleanup are established in the state Sediment Management Standards, [Chapter 173-204 Washington Administrative Code \(WAC\)](#)<sup>3</sup>.

### Model Toxics Control Act (MTCA)

MTCA began as a grassroots citizen's initiative in 1988, and started the process of systematically cleaning up contaminated sites in Washington. Under the MTCA, a current or past property owner or operator may be held responsible for cleaning up contamination on, or coming from, their property to standards that are safe for human health and the environment.

Ecology enacts the MTCA and oversees cleanups in the state and issues regulations and guidance governing those cleanups. The regulations are found in [Chapter 173-340 WAC](#)<sup>4</sup>. Ecology evaluates reports of property contamination, and if the contamination is seen as a significant threat to human health or the environment, the contaminated property is placed on the Hazardous Sites List. The cleanup process begins through a legal agreement with Ecology and the liable persons or when the liable person (usually the owners or operators) decide to clean up the site independently following the MTCA and related guidance.

Public participation is an important part of cleanup under the MTCA process. Participation needs are assessed at each cleanup site according to the level of public interest and the degree of risk posed by the contamination. Individuals who live near the site, community groups, businesses, government, other organizations, and interested parties have the opportunity to get involved by commenting during the cleanup process.

Under the MTCA, the cleanup process generally includes four steps, with opportunities for the public to review and comment on cleanup documents. In addition, a partial cleanup (called an interim action) can occur at any time during the cleanup process. The public is provided an opportunity to review and comment on planned interim action work as well.

---

<sup>1</sup> [ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants](http://ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants)

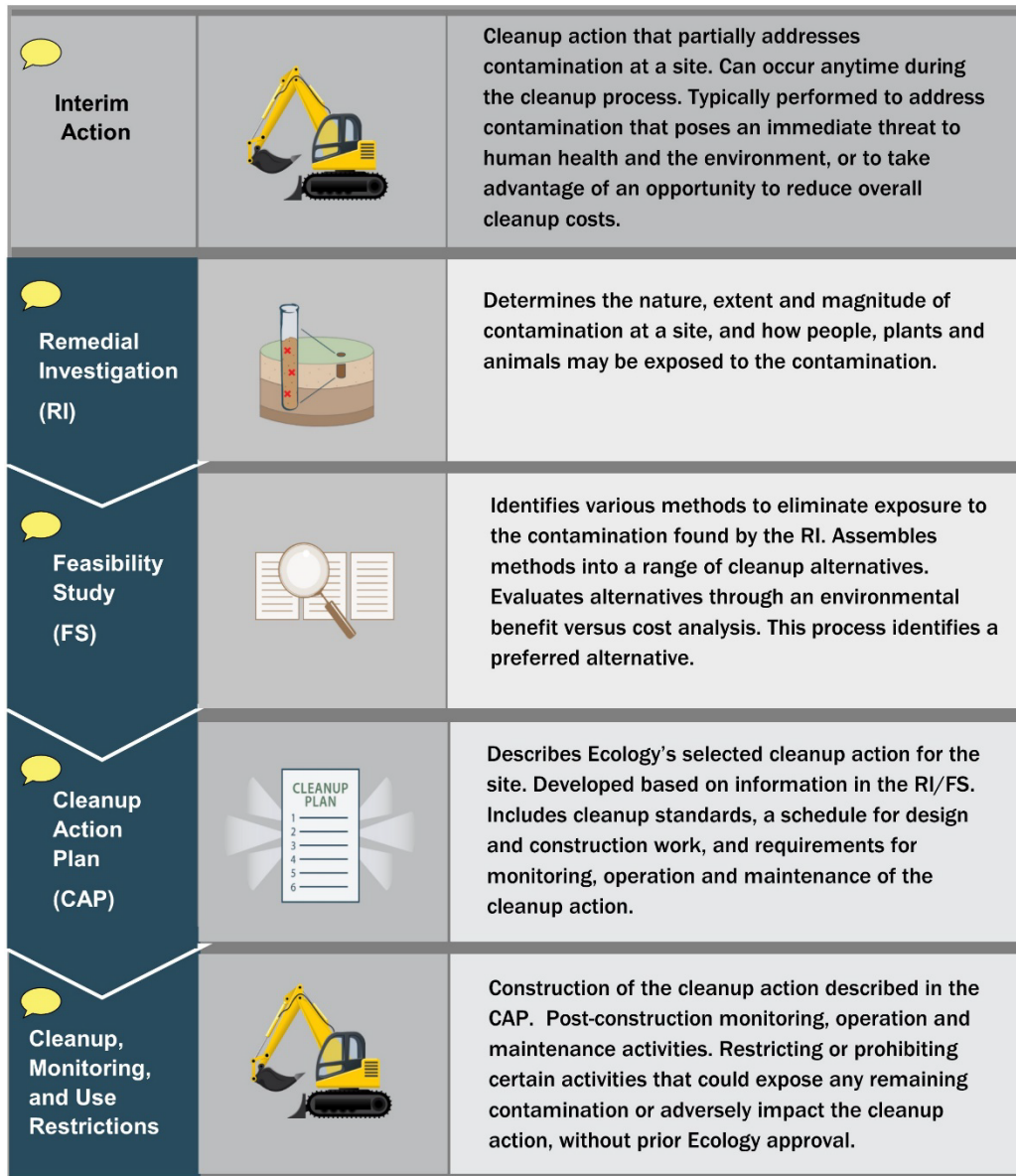
<sup>2</sup> <https://fortress.wa.gov/ecy/publications/publications/9406.pdf>

<sup>3</sup> <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-204>

<sup>4</sup> <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-340>



## Steps in Washington’s Cleanup Process



 Opportunities for public review and comment

Figure 1: Steps in Washington's Cleanup Process

## State Environmental Policy Act

Under the State Environmental Policy Act (SEPA; Chapter 197-11 WAC) potential adverse environmental impacts must be considered by state and local agencies when making decisions. Although cleanup projects typically do not result in adverse environmental impacts, SEPA review is conducted throughout the cleanup process as required.

## Site Information

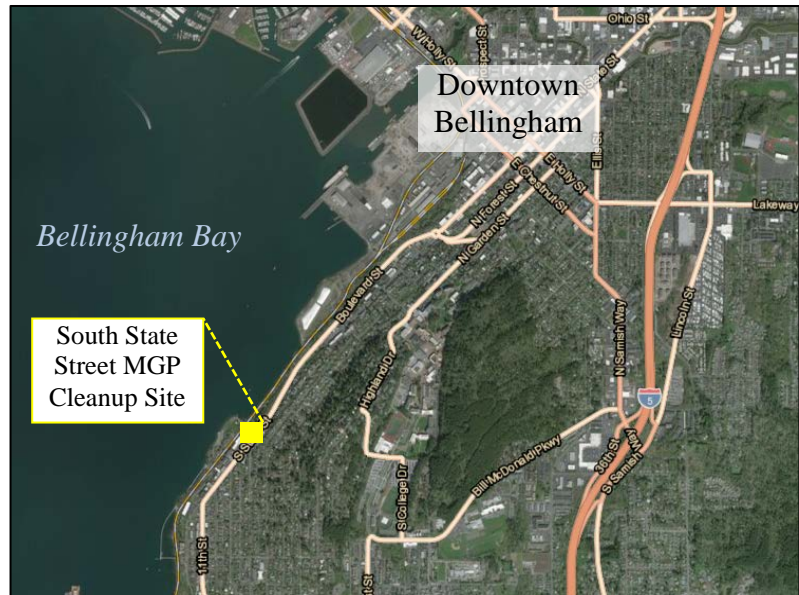
### Background and location

The South State Street Manufactured Gas Plant site is approximately 6 acres and comprises a portion of the north end of Boulevard Park and Bellingham Bay. Portions of the property at South State Street near Bay View Drive are contaminated where a manufactured gas plant (Figure 3) operated from the 1890s to the 1950s. The plant made home heating and cooking fuel from coal. Other potential sources of contamination also include historic railroad and lumber mill operations. The only remaining visible gas plant structures are a concrete gas-holding tank (Figure 4) and a small brick building (Figure 5) near South State Street.

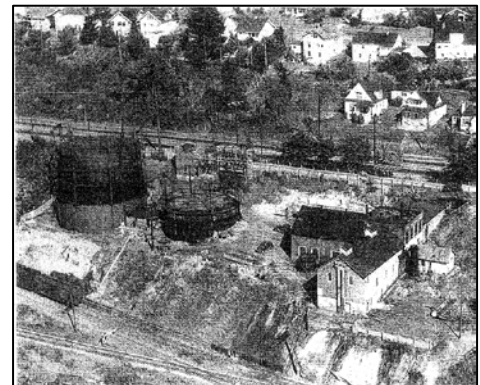
Bellingham Bay Gas Co., a predecessor to Puget Sound Energy, was the first operator of the plant. Cascade Natural Gas bought and continued to operate the plant in the 1950s. Residential developers bought the plant property in the 1960s. The City acquired most of the gas plant property in 1975 for use as a park. The state and BNSF Railway Co. also own portions of the contaminated area.

An agreed order (legal agreement) in 2010 between Ecology, the City, and PSE requires the City and PSE to investigate contamination (remedial investigation) evaluate cleanup alternatives (feasibility study), and prepare a report of their findings. The legal agreement also includes provisions to take early cleanup actions if necessary.

Historically, marine forces and storms caused shoreline erosion and damage to a public pier. This triggered the need for an early cleanup action to prevent further shoreline erosion and potential exposure to and movement of contaminated soil. The early action, called an interim action, was completed in October 2017.



**Figure 2: South State Street Manufactured Gas Plant cleanup site location**



**Figure 3: Manufactured gas plant facing east, Circa 1950**



*Public Participation Plan: South State Street Manufactured Gas Plant*

The interim action:

- Removed creosote-treated piles and a wood deck.
- Stabilized an existing concrete bulkhead.
- Stabilized approximately 450 linear feet of shoreline with rock.

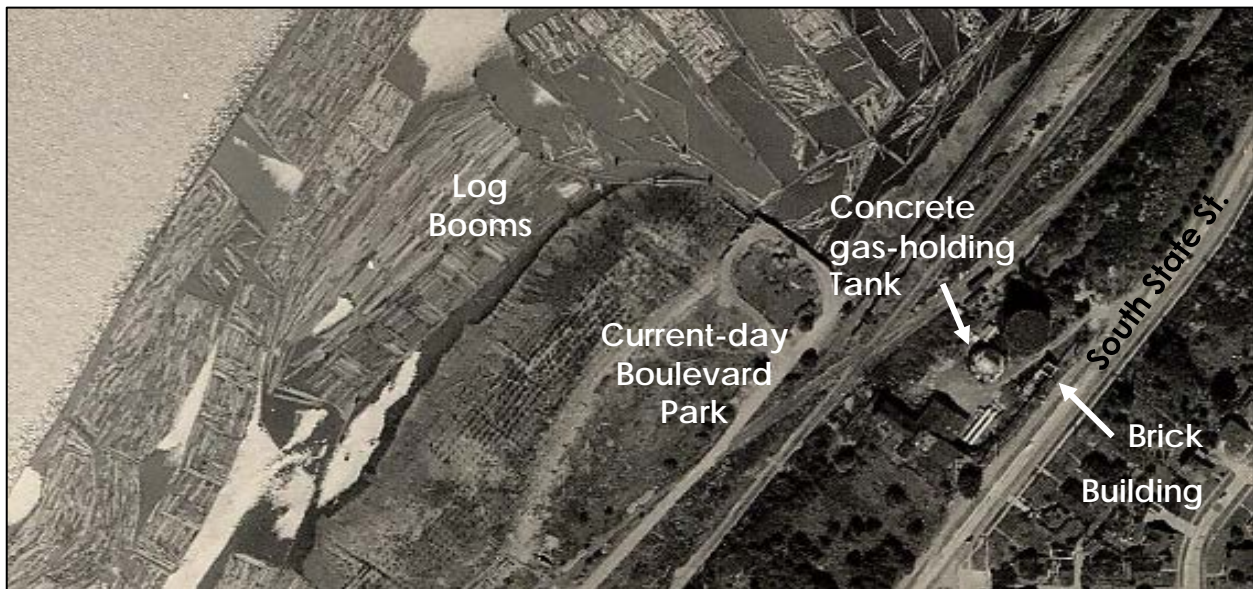
The Site is one of 12 sites coordinated through the Bellingham Bay Demonstration Pilot. The Pilot is a bay-wide multi-agency effort to clean up contaminated sediment, control sources of sediment contamination, and restore habitat, with consideration for land and water uses. In 2000, participants in this initiative developed the [Bellingham Bay Comprehensive Strategy](#)<sup>5</sup>.



**Figure 4: Concrete gas-holding tank near South State Street, upper Boulevard Park**



**Figure 5: Small brick building near South State Street, upper Boulevard Park**



**Figure 6: Historic aerial view of cleanup site with surrounding log booms, Circa 1950**

<sup>5</sup> <https://fortress.wa.gov/ecy/gsp/DocViewer.aspx?did=8276>

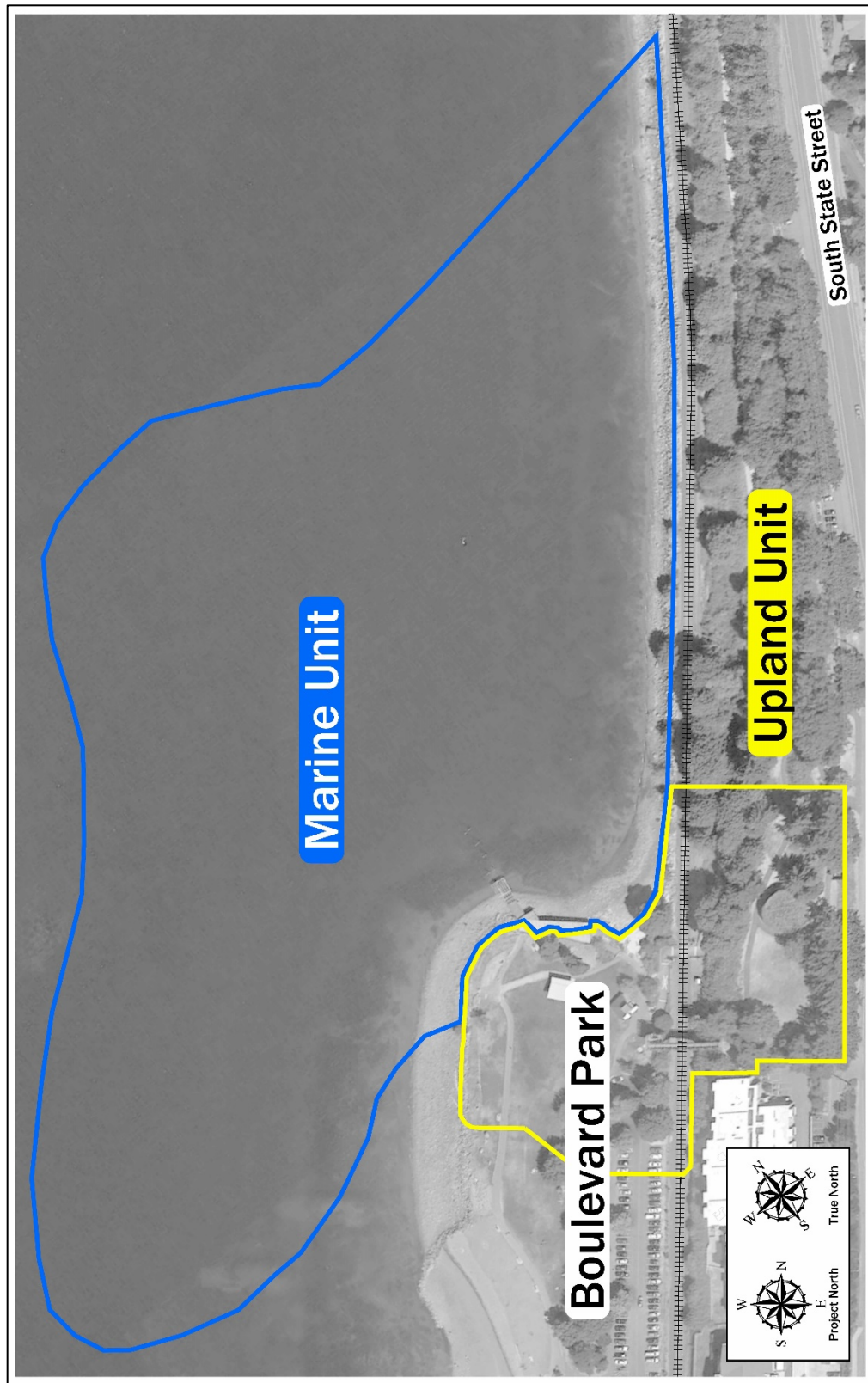


Figure 7: Aerial view of cleanup site Upland and Marine Units



## **Contamination**

The remedial investigation conducted by the City and PSE under the 2010 legal agreement found contamination from historic industrial practices. Sediment, soil, and groundwater are contaminated with:

- carcinogenic polycyclic aromatic hydrocarbons (cPAHs)
- benzene
- naphthalene
- cyanide
- selenium
- lead



**Figure 8: Groundwater sampling on Site, June 2016**

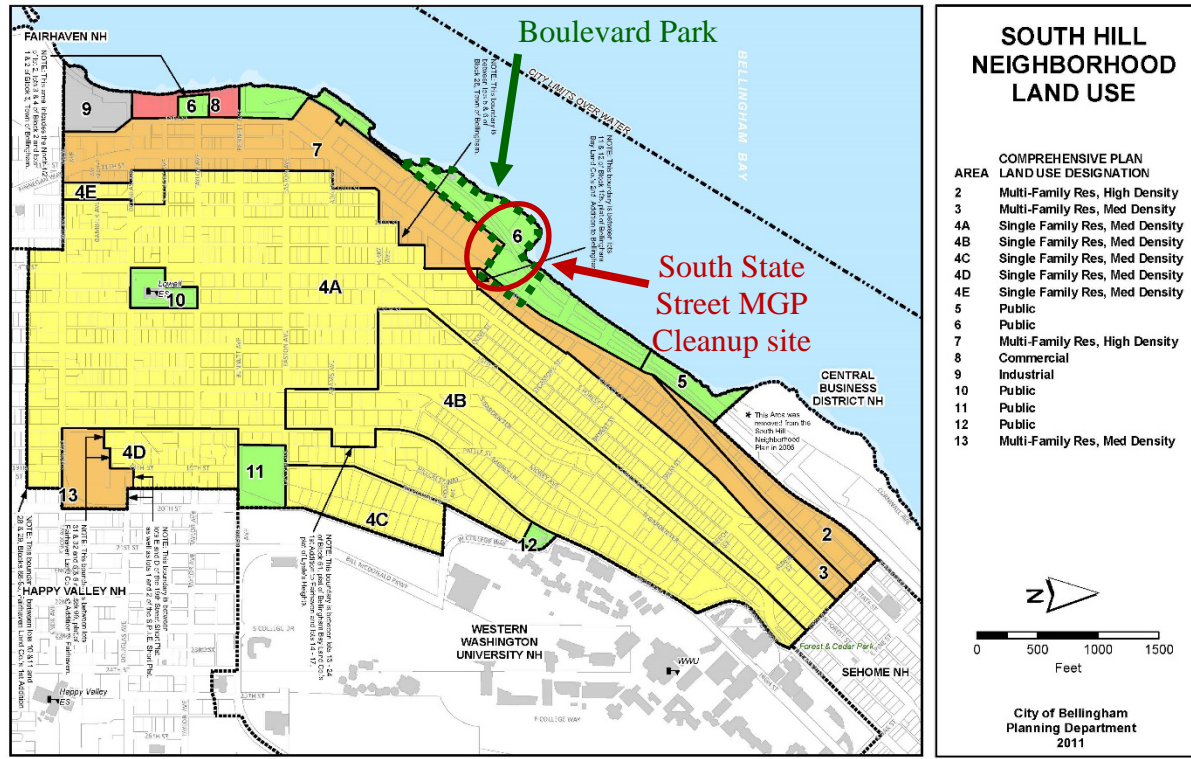
## **Cleanup plans**

The City and PSE are currently completing a remedial investigation and feasibility study report that summarizes investigation results, evaluates a range of cleanup alternatives, and identifies a preferred cleanup alternative. Ecology expects to issue the report for public review and comment in 2018.

Based on the information in the final remedial investigation and feasibility study report, Ecology will select a cleanup action to address contamination at the Site. We will describe our selected cleanup action in a draft Cleanup Action Plan. The plan will be part of a legal agreement that requires the City and PSE and possibly others, to design and implement the cleanup action described in the plan. Ecology expects to issue the legal agreement and cleanup action plan for public review in 2019.

## **Area community**

The Site is located at the north end of Boulevard Park, within Bellingham's South Hill neighborhood. South Hill is a mostly residential neighborhood zoned for single-family homes with a band of multi-family residential zoning overlooking Bellingham Bay. Small waterfront areas at the south end of the neighborhood are zoned for heavy industrial and commercial use.



**Figure 9: Cleanup site location in Bellingham's South Hill Neighborhood**

Most of the neighborhood’s waterfront is occupied by Boulevard Park, a popular park that includes paved trails, grassy areas, restrooms, a playground, picnic tables, barbecues, interpretive displays, beaches, a musical pavilion, a coffee shop, and parking areas.

The population of the South Hill neighborhood is over 3,000 residents or approximately 3% of the Bellingham’s total population. Bellingham’s last population estimate was 87,574 on July 1, 2016, an increase of 6,308 (7.8% increase) since the last census in April 1, 2010. For reference, the United States total population increased 4.7% over the same timeframe.<sup>6</sup> Over the past 20 years, annual population increase for Bellingham has averaged 1,400 people per year and the adopted 20-year growth forecast is for an average of 1,350 people per year.<sup>7</sup>

The [Environmental Protection Agency’s Environmental Justice Screening and Mapping Tool](#)<sup>8</sup> reports a significant “population over 64 years of age” in the area surrounding the Site.

<sup>6</sup> <https://www.census.gov/quickfacts/fact/table/bellinghamcitywashington,US/PST045217>

<sup>7</sup> *WA State OFM Small Area Estimates, and Bellingham Comprehensive Plan*; [www.cob.org/housingstats](http://www.cob.org/housingstats)

<sup>8</sup> <https://ejscreen.epa.gov/mapper/index.html?wherestr=47.505875%2C+-122.290814>

The [United States Census Bureau's American Fact Finder](#)<sup>9</sup> census tract data reports no significant language populations speaking English less than “very well.”

Ecology will reach out to cultural community organizations as part of our public involvement efforts and provide information in other languages as appropriate following federal guidance.<sup>10</sup> The non-English language most widely spoken in the Site area is Spanish. As a result, Fact Sheets will provide contact information for Spanish speakers to request translation services. We strive to involve the whole community in our public participation efforts and welcome your input on additional measures we can take to reach the nearby community.

The Lummi Nation and Nooksack Tribe are federally recognized tribes that may harvest seafood from the Site. Ecology will reach out to these tribes throughout the cleanup process.

## **Public Participation Activities**

Interested persons may ask questions, submit informal comments, or share Site information with Ecology at any time. However, to be included in the formal Site record, comments must be submitted in writing during designated comment periods.

## **How we share information with the community**

During specific steps of the cleanup process, Ecology will mail notices about upcoming public comment periods to residences and businesses near the Site. The mailing list area may vary depending on the type of contamination and where it is located, but at a minimum it will include addresses within a quarter-mile radius of the Site, and other interested organizations and individuals. The notices will provide general information about the Site, contact information for submitting comments, and times and locations of public meetings or hearings, or how to request one if one is not yet scheduled.

Ecology may also develop documents outside of comment periods to keep the community updated on the Site's status. We will make these informational documents available online and, if warranted, by US mail.

Comment period notices and other Site announcements may also be posted in various locations throughout the community (for example, local businesses, schools, libraries).

---

<sup>9</sup> <https://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>

<sup>10</sup> Guidance to Environmental Protection Agency Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 69 Fed. Reg. § 35602 (June 15, 2004).

## Notification lists

Ecology maintains an email list and a mailing list that includes: postal addresses within a quarter-mile radius of the Site; relevant local, state, federal, and tribal government contacts; and, other interested parties.

We will use these lists to send notices when cleanup documents are available for public review and comment or for other Site communications.

If you would like to be added to the email or mailing lists for this Site, please contact Ian Fawley at 360-255-4382 or [ian.fawley@ecy.wa.gov](mailto:ian.fawley@ecy.wa.gov).

## Site Register

Public comment periods, events, and other cleanup notices are published in Ecology's [Site Register](#).<sup>11</sup> To receive the *Site Register* by email, please contact Cheryl Ann Bishop at 360-407-6848 or [cherylann.bishop@ecy.wa.gov](mailto:cherylann.bishop@ecy.wa.gov), or [subscribe online](#).<sup>12</sup>

## Newspaper display ads or legal notices

We announce public comment periods and events in ads or notices published in the Bellingham Herald. We will also publish notice on our [Public Input & Events Listing](#).<sup>13</sup>

## Ecology's website and social media platforms

We maintain a [website for the South State Street Manufactured Gas Plant](#) site.<sup>14</sup> The website provides Site information, including current status, public comment period information and documents, and other Site documents.

We may also share information about cleanup sites through [news releases, our ECOconnect blog, and social media](#).<sup>15</sup>

---

<sup>11</sup> [ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data](http://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data)

<sup>12</sup> <http://listserv.wa.gov/cgi-bin/wa?SUBED1=siteregister&A=1>

<sup>13</sup> [ecology.wa.gov/Events/Search/Listing](http://ecology.wa.gov/Events/Search/Listing)

<sup>14</sup> <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=460>

<sup>15</sup> [ecology.wa.gov/About-us/Get-to-know-us/News](http://ecology.wa.gov/About-us/Get-to-know-us/News)



## **Document repositories**

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

### **Bellingham Public Library**

210 Central Avenue  
Bellingham, WA 98225  
Phone: 360-778-7323

### **Washington Department of Ecology**

Bellingham Field Office  
913 Squalicum Way, Unit 101  
Bellingham, WA 98225

To schedule an appointment, please contact the Bellingham Field Office Administration Staff at 360-255-4400 or [ECYDLBFOADMINSUPPORT@ecy.wa.gov](mailto:ECYDLBFOADMINSUPPORT@ecy.wa.gov).

### **Washington Department of Ecology**

Northwest Regional Office  
3190 160<sup>th</sup> Avenue SE  
Bellevue, WA 98008-5452

To schedule an appointment, please contact the Northwest Region Office Central Records staff at 425-649-7190 or [sally.perkins@ecy.wa.gov](mailto:sally.perkins@ecy.wa.gov).

## **Signs at the Site**

We may also install signs displaying information about cleanup status, traffic impacts, and health risks at the Site.

## **How to share information with us**

Interested persons may ask questions, submit informal comments, or share Site information with Ecology at any time. However, to be included in the formal Site record, comments must be submitted in writing during designated comment periods. These written comments can be submitted via:

- Ecology's online comment form
- Email or mail to the Ecology Site Manager

We may also meet with interested community members and organizations to gather information and identify public concerns. To collaborate with us about this Site, please contact Ian Fawley at 360-255-4382 or [ian.fawley@ecy.wa.gov](mailto:ian.fawley@ecy.wa.gov).

## **Public comment periods**

At minimum, the MTCA requires 30-day public comment periods for cleanup documents. Ecology may hold longer public comment periods based upon the complexity of the documents, level of public interest, or other compelling factors.

For related SEPA documents, these are typically issued for public review with the cleanup documents and follow their public comment period.

After a public comment period ends, we respond in writing to all comments received in a Response to Comments document. This document is provided to each commenter, and placed on the Site webpage. If the comments received result in significant changes to the cleanup documents, then we will revise and re-issue the documents for public review. If the comments do not result in significant changes, then the documents are considered final.

## **Public events**

We hold public meetings, workshops, open houses, and public hearings based on community interest. If we have not scheduled a meeting, we will hold one if we receive 10 or more written requests.

Events are held at locations close to the Site that meet Americans with Disabilities Act standards. Public meetings, workshops, open houses, and hearings are always announced in advance using a variety of methods.

# **Plan Amendments/Updates**

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We review it as the cleanup progresses and amend/update it as necessary.

This plan includes information for the public regarding opportunities to get involved in the Site cleanup process. The outreach activities and mechanisms presented reflect Ecology's current plans for keeping the public informed and for receiving information and comments from the public.

If you feel the outreach activities and mechanisms described in this plan are insufficient, or need modification, please contact Ian Fawley at 360-255-4382 or [ian.fawley@ecy.wa.gov](mailto:ian.fawley@ecy.wa.gov).