



DEPARTMENT OF
ECOLOGY
State of Washington

Public Participation Plan

Tacoma Metals

1919 Portland Avenue, Tacoma, WA

Facility Site ID: 1257

Cleanup Site ID: 3910

April 2020

Publication and Contact Information

This plan is available on the Department of Ecology's website at:

<https://fortress.wa.gov/ecy/publications/summarypages/2009120.html>

For more information contact:

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To request Americans with Disabilities Act accommodation, or printed materials in a format for the visually impaired, contact the Ecology ADA Coordinator at 360-407-6831 or ecyadacoordinator@ecy.wa.gov, 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

Tacoma Metals

Toxics Cleanup Program
Southwest Region
Washington State Department of Ecology
Olympia, Washington

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Public Involvement in Contamination Cleanup

The Washington State Department of Ecology (Ecology) developed this public participation plan (plan) for International Paper Company, General Metals of Tacoma, the Estate of Sophie Sussman, and Tacoma Metals, the four Potentially Liable Parties (PLPs) that are responsible for the Tacoma Metals site (site) cleanup costs. The purpose of the plan is to promote meaningful community involvement during cleanup of the site.

The plan describes ways Ecology will inform the public about contamination investigations and cleanup options throughout the cleanup process. Ecology encourages the public to learn about and get involved in decision-making opportunities. This plan identifies how and when the public can get involved during different stages of the investigation and cleanup of contamination.

Site contacts

To be included in the site record, comments about the cleanup process must be submitted during comment periods. Questions and informal comments or information about the site's history are welcome anytime.

Ecology

Southwest Regional Office
PO Box 47775
Olympia, WA 98504-7775

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360-407-6316

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360-407-6255

Public Participation Grants

Grants may be available to neighborhood committees, non-profits, and other groups interested in the site. For contaminated sites, these funds can be used to:

- Hire an expert to help interpret technical information¹
- Conduct activities that enhance the public's understanding of, and participation in, the cleanup process

For more information about public participation grants, please contact Lynn Gooding at 360-407-6062 or lynn.gooding@ecy.wa.gov. You may also visit the [Public Participation Grant website](#).²

Washington's Cleanup Laws

Ecology uses the Model Toxics Control Act (MTCA) and accompanying regulations for cleanup activities.

This plan is required under MTCA, a law that passed in 1989. MTCA provides guidelines for contaminated site cleanup in Washington State and sets standards to ensure the cleanup protects human health and the environment.

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 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 MTCA and oversees cleanups in the state and issues regulations and guidance governing those cleanups. The regulations are found in [Chapter 173-340 Washington Administrative Code \(WAC\)](#).³ Ecology investigates 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, and the cleanup process begins.

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,

¹ 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.

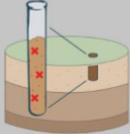
² ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants

³ <https://fortress.wa.gov/ecy/publications/publications/9406.pdf>

government, other organizations, and interested parties have the opportunity to get involved by commenting on the cleanup process.

Under MTCA, the cleanup process generally includes five phases. Each phase includes an opportunity for the public to review and comment on cleanup documents.

Steps in Washington's Cleanup Process

 <p>Interim Action</p>		<p>If contaminants pose an immediate risk to people or the environment, action can be taken at any point in the cleanup process to reduce the risk. Interim actions may also be used to progress cleanup when only a brief opportunity is available.</p>
 <p>Remedial Investigation (RI)</p>		<p>Environmental investigation to identify the nature, extent, and magnitude of pollution at a site, and how people, plants, and animals may be exposed to the pollution.</p>
 <p>Feasibility Study (FS)</p>		<p>Uses information gathered during the Remedial Investigation to develop cleanup alternatives, and then evaluates them through an environmental benefit vs. cost analysis. This process determines a preferred alternative.</p>
 <p>Cleanup Action Plan (CAP)</p>		<p>Ecology identifies a cleanup plan based on information in the RI/FS and public input. The CAP includes cleanup standards, a schedule for design and construction work, and requirements for monitoring, operation, and maintenance.</p>
<p>Cleanup & Monitoring</p>		<p>The CAP is used to clean up the site. After construction is complete, monitoring occurs. Environmental covenants prohibit or restrict activities that would expose any remaining contamination or adversely affect the cleanup.</p>

 Opportunities for public comment

Figure 1. Steps in Washington's Cleanup Process

State Environmental Policy Act

The State Environmental Policy Act (SEPA) is followed during review and development of cleanup plans.

Site History

Land use

The Tacoma Metals site is generally located at 1919 Portland Avenue in Tacoma. It is bound to the north by the Puyallup River, to the east by the Lincoln Avenue Bridge, to the south by Portland Avenue, and to the west by a City of Tacoma right-of-way and private properties (Figure 2).

The historical, current, and anticipated future land use is industrial. The City of Tacoma zoning includes Port Maritime, Industrial, and S-9 Puyallup River Urban Center. The site has been vacant and fenced for many years.



Figure 2 Site Location

How the site became contaminated

The Tacoma Metals site has a long history of industrial use. Soil and groundwater were contaminated by creosoting plant operations, coke plant operations and building demolition, and releases from metals recycling operations.

The St. Paul & Tacoma Lumber Company operated a creosoting facility between the early 1900s and 1930. The facility included the main creosoting plant structure, which housed a 130-foot treatment retort, and a 1,500 gallon above ground storage tank (AST). Two other ASTs (450,000 gallon and 102,000 gallon) were located nearby. International Paper acquired the St. Paul and Tacoma Lumber Company in 1958.

The Defense Plant Corporation and Wilkeson Products Company operated a coke manufacturing plant between 1942 and 1944. Structures included a coal bunker, coke oven battery, and conveyors. The plant was constructed on mixed fill, which contained some of the demolition waste from the creosoting plant (Aspect Consulting, 2018).

Leslie and Sophie Sussman (the Sussmans) acquired the property located at 1919 Portland Avenue in the early 1950s and their corporation, General Metals operated a metals recycling facility. Between 1983 and 1999, Tacoma Metals operated the facility and leased the property from the Sussmans. The metal recycling facility dismantled and drained transformers, dismantled lead-acid batteries and recovered and recycled lead from copper cables. They processed, handled, and/or redistributed scrap materials that contained copper, brass, lead, aluminum, and stainless steel. Metals recycling operations ended in 1999.

Prior to the construction of an earthen levee built by the US Army Corps of Engineers in the late 1940s and 1950s, the southern bank of the Puyallup River was adjacent to the northern boundary of the site. The levee shifted a portion of the river to the north and separated the site from the main river channel. The former channel area was gradually filled in with wood waste by surrounding property owners. In 2005, the City of Tacoma constructed the Puyallup River Side Channel (PRSC) to allow the Puyallup River to flow back into the former channel area. During construction, unexploded military ordnance, lead-containing battery casings, drums, and metal debris were discovered.

Since 2000, remedial investigations have identified the nature and extent of contamination. Over the years, interim actions were conducted to remove tanks, building structures, and to address several areas of contamination. The PRSC contamination was cleaned up in 2007. Additional cleanup actions are planned.

Contamination

The PLPs will further study the soil and groundwater on the western part of the site and areas outside of the site boundary that were affected by the former creosoting plant.

These areas are contaminated with petroleum and creosote in the form of:

- Total petroleum hydrocarbons as diesel and oil range organics
- Total polycyclic aromatic hydrocarbons
- Total Naphthalene

Cleanup plans

The PLPs are current or past facility owners or operators of the Tacoma Metals site and under MTCA are jointly and severally responsible for the cleanup. They have entered into the following legal agreements with Ecology:

- Agreed Order No. 17989 with International Paper Company and General Metals of Tacoma.
- Enforcement Order No. 17990 with the Estate of Sophie Sussman and Tacoma Metals.

The legal agreements require the PLPs to collect additional data for the Tacoma Metals site. There were some data gaps in the [2018 Revised Draft Remedial Investigation and Feasibility Study](#) that need to be filled in before Ecology selects a final cleanup remedy for the site.

The PLPs will write a work plan, and investigate and find cleanup alternatives for:

- Soils near the City of Tacoma Right of Way and the former Simpson Property.
- Soils beneath an area where a former 450,000 gallon above ground storage tank was located and northeast of that area (toward the Puyallup River).
- Groundwater beneath the site in the area of City of Tacoma right-of-way and in the northeast portion of the site.

In addition, the PLPs will find out whether contaminated groundwater is moving off the site and impacting the Puyallup River. They will recommend monitoring procedures and cleanup alternatives.

Area community

The Tacoma Metals site is located in an industrial area in the Tacoma Tideflats. After the metals recycling operations ended in 1999 and buildings were demolished, site activities included remedial investigations, interim action cleanups, and a temporary containment unit for metals-impacted soils from the PRSC. During a groundwater investigation in 2016, the City of Tacoma evicted a homeless encampment that had settled on the site (Aspect Consulting, 2018). The site is currently vacant.

The American Community Survey (ACS) data from 2011 to 2015 shows that for census tract 602, Spanish is the most common foreign language spoken at home by persons that speak English less than “very well”. Other languages include Mon-Khmer, Cambodian, Korean, and other Indic languages.

Ecology will provide information in other languages as appropriate following federal guidance.⁴ Ecology strives to make public participation efforts as inclusive as possible and welcomes your input about how to best reach the nearby community.

Table 1 shows the Environmental Protection Agency’s (EPA) EJScreen Tool for the demographics within a quarter-mile of the site. Ecology uses the demographic indicators to help predict language access needs and to identify and address environmental justice issues.

Table 1 Environmental and demographic information for the area near the Tacoma Metals site.

Selected Variables	Value	State Average	Percentile in State	EPA Region Average	Percentile in EPA Region	USA Average	Percentile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	7.33	7.23	74	7.54	53	9.53	13
Ozone (ppb)	33.4	33.9	57	36.1	36	42.5	6
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	2.31	1.4	89	1.06	90-95th	0.938	95-100th
NATA* Air Toxics Cancer Risk (risk per MM)	44	40	63	39	60-70th	40	60-70th
NATA* Respiratory Hazard Index	3.3	2.8	64	2.8	60-70th	1.8	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	760	450	84	380	87	600	84
Lead Paint Indicator (% pre-1960s housing)	0.12	0.23	46	0.23	46	0.29	40
Superfund Proximity (site count/km distance)	0.45	0.17	89	0.12	93	0.12	94
RMP Proximity (facility count/km distance)	4.7	0.61	98	0.63	99	0.72	98
Hazardous Waste Proximity (facility count/km distance)	7.2	1.9	94	1.5	95	4.3	93
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.007	0.062	89	0.038	89	30	78
Demographic Indicators							
Demographic Index	52%	29%	89	29%	90	36%	75
Minority Population	53%	30%	85	27%	88	38%	69
Low Income Population	52%	29%	86	32%	83	34%	79
Linguistically Isolated Population	3%	4%	59	3%	64	4%	60
Population with Less Than High School Education	18%	9%	85	10%	85	13%	74
Population under Age 5	0%	6%	3	6%	3	6%	4
Population over Age 64	9%	14%	28	14%	26	14%	27

*The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

⁴ 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).

The Puyallup Tribe is a federally recognized tribe that owns land or relies on resources that could be affected by site contamination. For thousands of years, the Tribe has used the surrounding natural resources including the riparian areas of the Puyallup River for food, medicines, and materials for clothing. They have a spiritual connection to the land. Ecology will provide ample opportunity to the Tribe to be involved throughout the cleanup process on a government-to-government basis.

Public Participation Activities

Members of the public may ask questions, submit informal comments, or share site information at any time. Interested parties do not need to wait for a formal public comment period to contact Ecology.

However, to be included in the formal site record, comments about the site investigation, cleanup alternatives, or cleanups must be submitted during formal comment periods. In addition, the public is invited to review site documents before they become final. This is the most direct and influential way to learn more about the site and be involved in the cleanup's decision-making.

How we share information with the community

During specific stages of the cleanup, Ecology will mail notices about public comment periods to addresses surrounding the site. The mailing list area will vary depending on the type of contamination and where it's located, but the list will at least include addresses within a 1/4-mile radius of the site and other interested organizations and individuals. These 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 not yet scheduled.

Ecology may also develop documents outside of comment periods to keep the community updated on the site's status. These informational documents will be available online and at document repositories. Print copies may be mailed to the nearby community if we feel the message warrants the associated cost and resources.

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

Postal mailing list

Ecology maintains a mailing list that includes addresses within a ¼ mile radius of the site and relevant local, state, and federal government contacts.

These people receive public comment notices when draft documents are available.

We will add additional individuals, organizations, and other interested parties to the mailing list as requested. If you would like to be added to the mailing list for this site, please contact Sheila Coughlan at 360-407-6255 or Sheila.Coughlan@ecy.wa.gov.

Site Register

Public comment periods, events, and other cleanup notices are published in Ecology's [Site Register](#).⁵ To receive the *Site Register* by email, please contact Sarah Kellington at 360-407-7466 or Sarah.Kellington@ecy.wa.gov, or [subscribe online](#).⁶

Newspaper display ads or legal notices

We announce public comment periods and events in ads or notices published in the Tacoma News Tribune. We will also publish notice on our [Public Input & Events Listing](#).⁷

Email lists

Ecology maintains an email list to update interested persons about this site. If you would like to be added to the email list for this site, please contact Sheila Coughlan at 360-407-6255 or Sheila.Coughlan@ecy.wa.gov.

Ecology's website and social media platforms

We maintain a [website](#) for the Tacoma Metals site.⁸ The website provides site information, and you may download cleanup documents.

⁵ ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data

⁶ <http://listserv.wa.gov/cgi-bin/wa?SUBED1=siteregister&A=1>

⁷ ecology.wa.gov/Events/Search/Listing

<https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=3910>

We may also share information about cleanup sites through [news releases, our ECOconnect blog, and social media](#).⁹

Document repositories

ALERT: All Ecology offices and repositories are closed to walk-in service through at least May 4, 2020. For more information, please visit our [COVID-19 response page](#). See also the Washington State [coronavirus.wa.gov/](https://www.wa.gov/coronavirus) page.

If you are unable to view site information online at the Ecology website and have questions, please feel free to contact Andy Smith, Cleanup Project Manager or Sheila Coughlan, Public Involvement Coordinator at (360) 407-6255.

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

Citizens for a Healthy Bay
535 Dock Street #213
Tacoma, WA 98402
253-383-2429

Washington Department of Ecology
Southwest Regional Office
300 Desmond Drive
Lacey, WA 98503

To schedule an appointment, please contact Susie Baxter 360-407-6365 or Susan.Baxter@ecy.wa.gov.

Signs around the cleanup site

We may also install signs displaying information about project status, traffic impacts, and health risks around the cleanup site.

How to share information with us

At minimum, MTCA requires 30-day public comment periods for draft cleanup documents and 14-day comment periods SEPA documents. SEPA documents are often made available for public

⁹ ecology.wa.gov/About-us/Get-to-know-us/News

review with other cleanup documents. In that case, we combine the comment periods, and they last at least 30 days. We may hold comment periods longer than 30 days.

We may also identify public concerns and cleanup goals by meeting with and soliciting information from interested community members and organizations. To collaborate with us about this site, please contact Sheila Coughlan at 360-407-6255 or Sheila.Coughlan@ecy.wa.gov.

Public comment periods

Formal 30-day comment periods allow interested members of the public to comment on draft documents, legal agreements, and proposed cleanup actions. If there is significant interest, Ecology may extend the public comment period. When Ecology oversees SEPA determinations, we hold comment periods for at least two weeks and may extend to 30 days or more when other cleanup documents are concurrently available for review.

Following a comment period, we publish all the input we received and respond to significant comments and questions. If the comments result in significant changes to the cleanup documents, then the documents will be revised and re-issued for public review. If the comments do not result in significant changes, then they become 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 10 people request it, and this may cause us to extend a public comment period so the meeting occurs during it.

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.

Americans with Disabilities Act

To request ADA accommodation for disabilities, or printed materials in a format for the visually impaired, contact the Ecology ADA Coordinator at 360-407-6831 or ecyadacoordinator@ecy.wa.gov, 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.

Plan Amendments

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We review it as the cleanup progresses and amend it as necessary. You may suggest amendments to Sheila Coughlan at 360-407-6255 or Sheila.Coughlan@ecy.wa.gov.

This plan includes information for the public regarding opportunities for public involvement and comment. The outreach activities discussed in this section reflect Ecology's current plans for keeping the public informed and providing ways for those interested in the site to communicate their concerns and questions to us.

If you feel the planned outreach activities and mechanisms described in this plan are insufficient, or should otherwise be modified, we will work to find solutions. New outreach activities or outreach tools established as a result can be implemented right away, with or without amending this plan.

Appendix A Glossary

Agreed Order: A legal agreement between Ecology and a Potentially Liable Person (see below) to conduct work toward a cleanup.

Cleanup: Actions that deal with a release or threatened release of hazardous substances that could affect public health or the environment. Ecology often uses the term "cleanup" broadly to describe response actions or phases of cleanup, such as the Remedial Investigation/Feasibility Study.

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.

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

Enforcement Order: A legal agreement between Ecology and a Potentially Liable Person (see below) to conduct work toward a cleanup. Enforcement orders may be issued when attempts at negotiating an agreed order are unsuccessful,

Feasibility Study: This study develops and evaluates cleanup options for a site.

Groundwater: Water found beneath the earth's surface that fills spaces between materials such as sand, soil, or gravel. In some aquifers, ground water occurs in large enough amounts to be used for drinking water, irrigation and other purposes.

Repository: A file containing site information and reports for public review. It is usually located in a public building convenient for local residents, such as a public school, city hall, or library.

Model Toxics Control Act (MTCA): A law passed by Washington voter initiative in 1988. Its purpose is to find, investigate, and clean up places where hazardous substances have been released. It defines Ecology's role and encourages public involvement in cleanup decisions.

Potentially Liable Person: Any individual(s) or company(s) potentially responsible for, or contributing to, the contamination problems at a site. Whenever possible, Ecology requires PLPs to clean up sites.

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

Public Participation Plan: A plan that describes how the public can provide input on the cleanup of the site.

Remedial Investigation: This study characterizes the site and defines the extent of contamination.

Remedial Investigation/Feasibility Study: Two distinct but related studies. They are usually performed at the same time, and together referred to as the "RI/FS." They are intended to:

- Gather the data necessary to determine the type and extent of contamination;
- Establish criteria for cleaning up the site;
- Identify and screen cleanup alternatives for remedial action; and
- Analyze in detail the technology and costs of the alternatives.

Responsiveness Summary: A summary of oral and/or written public comments received by Ecology during a comment period on key documents, and Ecology's responses to those comments.

Risk: The probability that a hazardous substance, when released into the environment, will cause an adverse effect in the exposed humans or living organisms.

Site: Any area where a hazardous substance, other than a consumer product in consumer use, has come to be located.