



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

## **Public Participation Plan**

### **Stubblefield Salvage Yard 595 Offner Road, Walla Walla**

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Facility Site ID: 1367331

Cleanup Site ID: 4121

April 2020

## Publication and Contact Information

This plan is available on the Department of Ecology's website at:  
<https://fortress.wa.gov/ecy/gsp/CleanupSiteDocuments.aspx?csid=4121>

For more information contact:

Eastern Regional Office  
Toxics Cleanup Program  
4601 North Monroe St.  
Spokane, WA 99205

Katie Larimer, site manager  
509-329-3419

Erika Beresovoy, public involvement coordinator  
509-329-3546

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 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](mailto: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**

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**Stubblefield Salvage Yard**

Toxics Cleanup Program  
Eastern Region  
Washington State Department of Ecology  
Spokane, Washington

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## Public Involvement in Contamination Cleanup

The Washington State Department of Ecology (Ecology) developed this public participation plan (plan) in cooperation with Konen Properties, LLC, and Lenora Thompson, the parties responsible for cleanup costs. We are partially funding and managing the cleanup because parties responsible for contamination are unable to fully pay for cleanup. The purpose of the plan is to promote meaningful community involvement during cleanup.

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

Eastern Regional Office  
4601 North Monroe Street  
Spokane, WA 99205

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#### PLPs

Konen Properties, LLC  
Charlie Konen, Owner  
81890 Couse Creek Road  
Milton Freewater, OR 97862  
krock@pocketinet.com  
509-520-1515

Lenora Thompson (Shell)  
372 Channel Avenue  
Atwater, CA 95301

### 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 information<sup>1</sup>
- 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](mailto:lynn.gooding@ecy.wa.gov). You may also visit the [Public Participation Grant website](#).<sup>2</sup>

## 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 \(WAC\)](#).<sup>3</sup> 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,

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<sup>1</sup> 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.

<sup>2</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>3</sup> <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.

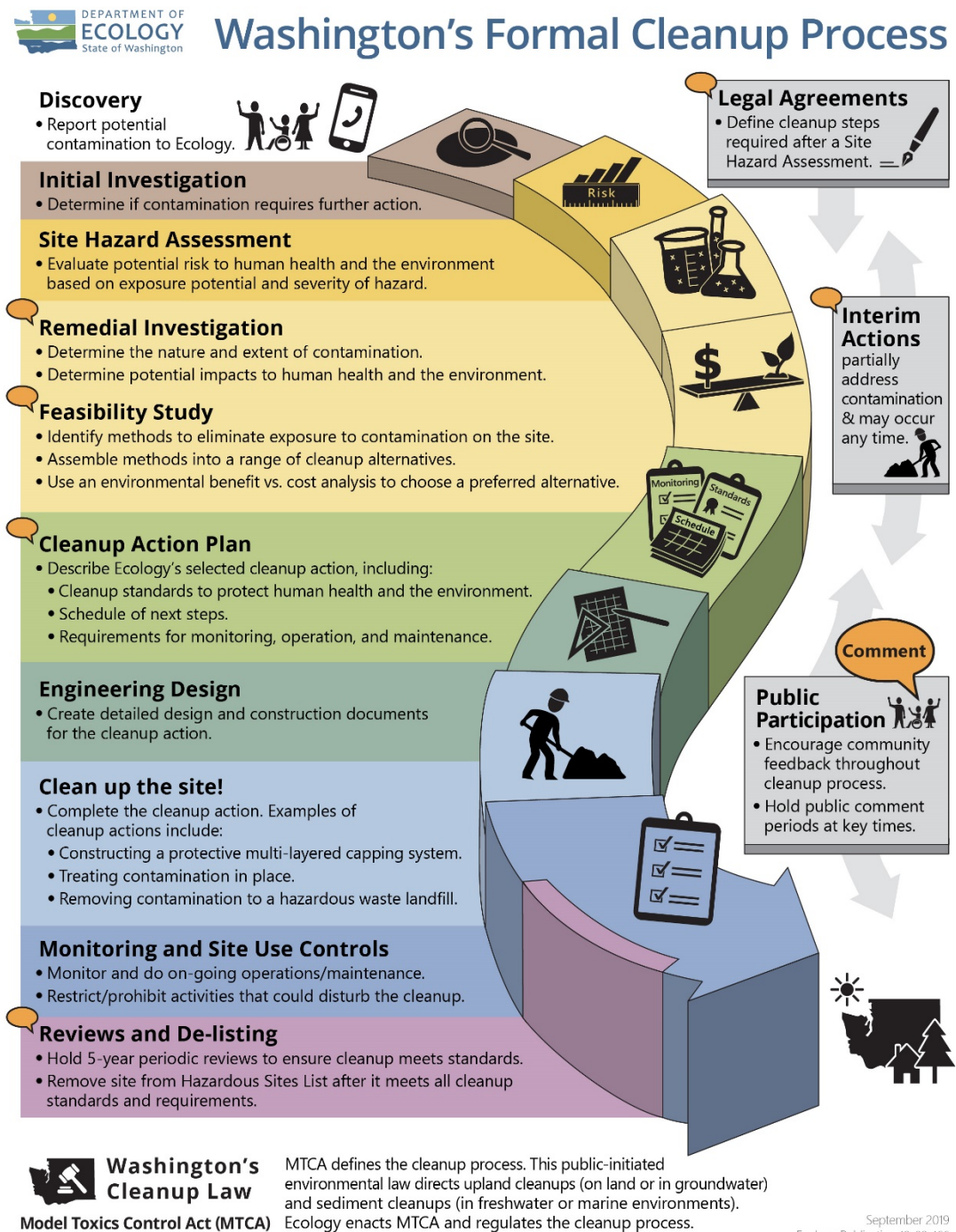


Figure 1. Steps in Washington's Cleanup Process



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## State Environmental Policy Act

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

## Site History

The Stubblefield Salvage Yard site is an approximately 11-acre site in northwest Walla Walla. The property operated as a fat-rendering plant from approximately 1945 to 1950, and as a salvage yard from approximately 1950 to 2010. In addition to the salvage yard activities, the site also housed a large amount of waste and debris including batteries, transformers, car bodies, and drums filled with waste materials. Lenora Thompson is listed on a property deed as an owner and operator of the site during these activities.

Konen Properties, LLC, purchased the property in 2014, and became a PLP due to its current site ownership, but was not involved in the previous activities that caused the property to become contaminated.

## How the site became contaminated

Soil and groundwater contamination is at levels exceeding state and federal standards due to historic business operations at the site.

In 2007, Ecology completed a [site hazard assessment](#)<sup>4</sup> following an unannounced dangerous waste compliance inspection that resulted in the site being added to the confirmed and suspected contaminated sites list. Stubblefield was ranked a one, which represents the highest level of concern relative to other known sites in Washington.

To assess potential hazards posed to humans and the environment if a site is not cleaned up, an Ecology staff member visits the site to gather basic information. Sites are ranked on a scale of one to five.

During the assessment, Ecology confirmed obvious releases to the environment (predominantly soil and air) of hazardous contaminants such as:

- Used motor oil and other heavy oils, likely diesel and gasoline spills from engine and car dismantling activities

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<sup>4</sup> <https://fortress.wa.gov/ecy/gsp/DocViewer.ashx?did=22930>

- Brake fluid (hydraulic fluids)
- Lead and acid contamination from damaged batteries lying uncovered on the ground
- Polycyclic aromatic hydrocarbons from used oil spills and burning of various automobile components

## Contaminants

Contaminants confirmed or suspected to be at the site in soil and/or groundwater include:

- [Petroleum products](#)<sup>5</sup>
- [Volatile organic compounds](#)<sup>6</sup> (VOCs) and semi-volatile organic compounds (SVOCs)
- [Polychlorinated biphenyls](#)<sup>7</sup> (PCBs)
- [Polycyclic aromatic hydrocarbons](#)<sup>8</sup> (PAHs)
- Pesticides
- Metals

Surface water runoff into Mill Creek, which forms the northern border of the site, has likely been prevented by berms and other site features.

## Cleanup plans

In 2009, the U.S. Environmental Protection Agency (EPA) visited the site and documented the presence of oil-stained soil, unlabeled drums, several large open-top tanks, and other types of uncontrolled wastes including transformers and asbestos-containing material (ACM). EPA initiated a time-critical Removal Action to remove the drums, excavate selected surface soil contamination, and mitigate damaged ACM siding from the shop building and ground.

EPA also performed a removal site evaluation from 2009 to 2012. This evaluation assessed the extent of soil and groundwater contamination in the northern portion of the site. In May and June 2013, EPA excavated and disposed of contaminated soil from the northern portion of the site. The excavated areas were backfilled with clean soil and graded to their pre-existing conditions.

Though the EPA remediated a portion of the site, contamination greater than MTCA cleanup levels still remains at the site, and the extent of contamination at the site had not been fully

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<sup>5</sup> <https://www.atsdr.cdc.gov/toxfaqs/tf.asp?id=423&tid=75>

<sup>6</sup> <https://www.atsdr.cdc.gov/substances/toxchemicallisting.asp?sysid=7>

<sup>7</sup> <https://www.atsdr.cdc.gov/substances/toxsubstance.asp?toxid=26>

<sup>8</sup> <https://www.atsdr.cdc.gov/substances/toxsubstance.asp?toxid=25>

defined. Documents related to EPA’s actions at the site can be viewed from their [Stubblefield Salvage website](#)<sup>9</sup>.

Ecology directed a contractor to perform a remedial investigation and feasibility study (RI/FS) at the site to fully define the extent of remaining contamination and develop final cleanup options. After the draft RI/FS report undergoes public comment and becomes final, we will write a cleanup action plan using information in the report and public input.

## Area community

The site is located about 1.5 miles west of downtown Walla Walla. Mill Creek, which flows west, is located directly north of the site and Myra Road is the western boundary. Hotels and other businesses are on the north side of Mill Creek, and the City of Walla Walla Wastewater Treatment Plant is to the west across Myra Road. Properties to the east and south are rural-residential with some agricultural use. Beyond that to the south is mixed residential neighborhoods with some business areas. The Walla Walla State Penitentiary, another cleanup site, is also in the northwest part of town, northeast of the Stubblefield site.

Walla Walla is the largest city and the county seat of Walla Walla County. Formed in 1854, the county was named after the Walla Walla Tribe of Native Americans. The city population was 31,731 at the 2010 census. The population of Walla Walla and its two suburbs, the town of College Place and unincorporated East Walla Walla, is about 45,000. The area is known for higher education—Whitman College, Walla Walla University, and Walla Walla Community College—and wineries, breweries, and restaurants. It has parks, golf courses, museums, and historic sites.

Walla Walla’s economy is primarily driven by agriculture: wine grapes, onions, wheat, potatoes, and more. Industries in Walla Walla County include construction, manufacturing, transportation and warehousing, private educational services, healthcare and social assistance, arts and entertainment, accommodation and food services, and government healthcare and educational services.

According to the 2010 census, the racial makeup of the city was 81.6 percent White, 2.7 percent African American, 1.3 percent Native American, 1.4 percent Asian, 0.3 percent Pacific Islander, 9.1 percent from other races, and 3.6 percent from two or more races. Hispanic or Latino of any race were 22 percent of the population.

The median age was 34.4 years. Twenty-two percent of residents were under the age of 18; 14.5 percent were between the ages of 18 and 24; 26.2 percent were from 25 to 44; 23.1 percent were

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<sup>9</sup> [https://response.epa.gov/site/site\\_profile.aspx?site\\_id=5508](https://response.epa.gov/site/site_profile.aspx?site_id=5508)

from 45 to 64; and 14 percent were 65 years of age or older. The gender makeup of the city was 51.9 percent male and 48.1 percent female.

Ecology will reach out to cultural community organizations as part of our outreach and provide information in other languages as appropriate following federal guidance.<sup>10</sup> The non-English language most widely spoken in the Walla Walla area is Spanish. When appropriate, Ecology will provide outreach in Spanish. We strive to make our public participation efforts as inclusive as possible and welcome your input about how to best reach the nearby community.

The Nez Perce, Umatilla Confederated, and Yakama Nation tribes are federally recognized tribes that rely on resources that could be affected by the contamination. Ecology will ensure that the tribes are engaged with any decision-making process for this site and have ample opportunity to be involved throughout the 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 0.25-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

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<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).

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 0.25-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 Erika Beresovoy at 509-385-2290 or [erika.beresovoy@ecy.wa.gov](mailto:erika.beresovoy@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 [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 *Walla Walla Union-Bulletin*. 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 [Stubblefield Salvage Yard site](#).<sup>14</sup> The website provides site information, and you may download cleanup documents.

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<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://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=4121>

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

## Document repositories

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

Walla Walla Public Library  
238 East Alder Street  
Walla Walla, WA 99362  
509-527-4550

Washington Department of Ecology  
Eastern Regional Office  
4601 North Monroe Street  
Spokane, WA 99205

To schedule an appointment with Ecology, please contact Miriam Robbins at 509-329-3415 or [miriam.robbins@ecy.wa.gov](mailto:miriam.robbins@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 for SEPA documents. SEPA documents are often made available for public 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 Erika Beresovoy at 509-385-2290 or [erika.beresovoy@ecy.wa.gov](mailto:erika.beresovoy@ecy.wa.gov).

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

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## 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](mailto: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 Erika Beresovoy at 509-385-2290 or [erika.beresovoy@ecy.wa.gov](mailto:erika.beresovoy@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.