



DEPARTMENT OF
ECOLOGY
State of Washington

Public Participation Plan

Port of Vancouver Cadet/Swan, NuStar Terminals Services, Inc. and Kinder Morgan Bulk Terminals, LLC Vancouver, Washington

Facility Site ID: 1026

Cleanup Site ID: 3450

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Publication and Contact Information

This plan is available on the Department of Ecology's website at:
<https://fortress.wa.gov/ecy/gsp/sitepage.aspx?csid=3450>

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- 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, 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

Port of Vancouver Cadet/Swan, NuStar Terminals Services, Inc. and Kinder Morgan Bulk Terminals, LLC Site

Toxics Cleanup Program
Southwest Region
Washington State Department of Ecology
Lacey, 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 Port of Vancouver Cadet/Swan (port), NuStar Terminals Services, Inc. (NuStar) and Kinder Morgan Bulk Terminals, LLC (KMBT), the parties responsible 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.

This plan is for Agreed Order #DE-15806 for the port, NuStar and KMBT (site).

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
300 Desmond Drive SE
Lacey, WA 98503

Craig Rankine, site manager
Craig.Rankine@ecy.wa.gov
360-690-4795

Sheila Coughlan, public involvement coordinator
Sheila.Coughlan@ecy.wa.gov
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.

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.

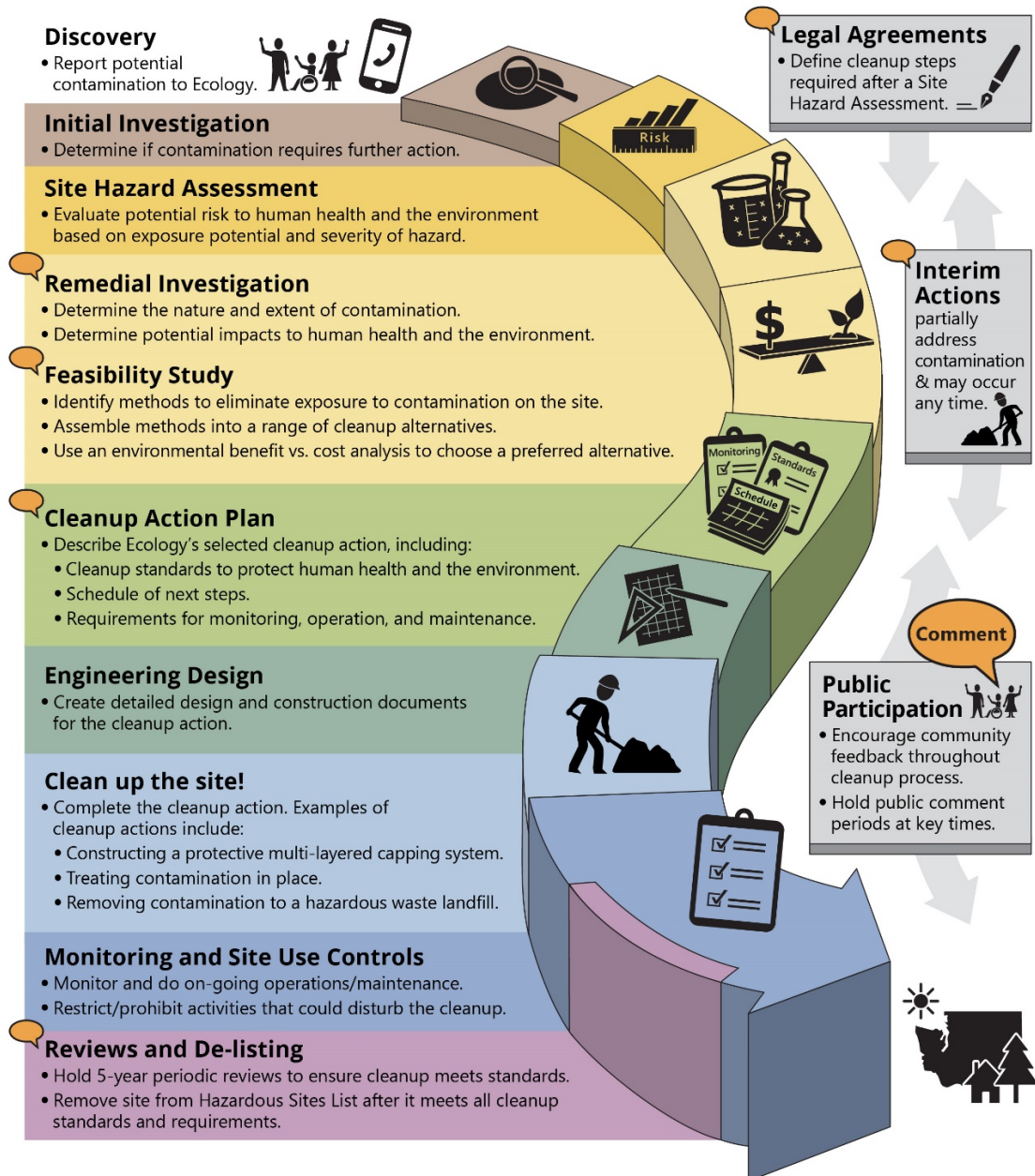
² ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants

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

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 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.

Washington's Formal Cleanup Process



Washington's Cleanup Law

Model Toxics Control Act (MTCA)

MTCA defines the cleanup process. This public-initiated environmental law directs upland cleanups (on land or in groundwater) and sediment cleanups (in freshwater or marine environments). Ecology enacts MTCA and regulates the cleanup process.

September 2019
Ecology Publication 19-09-166

State Environmental Policy Act

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

Site History

Land use

The site is identified by four portions located on Port of Vancouver property. The Cadet portion is generally located at 2500 West Fourth Plain Boulevard. The Swan portion is generally located between 2001 and 2501 West Fourth Plain Boulevard. The NuStar portion is generally located at 2565 NW Harborside Drive. The KMBT portion is located at 2701 NW Harborside Drive. Land use surrounding the site is industrial. It is bordered by the Columbia River to the south and bisected by SR 501 and the BNSF and Union Pacific railroad. The closest residential area is the Fruit Valley neighborhood located to the north and east.

How the site became contaminated

Soil and groundwater were polluted decades ago with chlorinated solvents such as trichloroethylene (TCE) that were used by Cadet Manufacturing Company (Cadet), and the former Swan Manufacturing Company (Swan) to clean sheet metal parts. These businesses made electric heaters.

Soil and groundwater were also polluted with chlorinated solvents, such as perchloroethylene (PCE) and TCE that were used by GATX Terminals Corporation, former operators at the NuStar facility. Data indicates that contaminated groundwater migrating from the NuStar facility toward the Columbia River is a source of chlorinated solvent in sediment.

NuStar, a tenant of the port, handles bulk fertilizer products at their terminal. KMBT, another tenant of the port, handles copper ore that also contains other metals. KMBT coordinates ore transport from mines to shipping companies. KMBT's facility is located next to NuStar. NuStar found nitrate, ammonia, and copper in groundwater beneath the NuStar and KMBT facilities.

Contamination

Due to historic land use and industrial practices, soil, groundwater and sediment are contaminated with Trichloroethylene (TCE) and Tetrachloroethylene (PCE).

Groundwater is also contaminated with copper, nitrate, ammonia and other metals. It has not been determined if these contaminants are present in soil or sediment.

The presence of these materials can be harmful to human health and the environment, so cleanup is important.

Public drinking water is not affected. The City of Vancouver supplies drinking water from groundwater wells at several locations within the City's limits. In addition, the port supplies drinking water to specific tenants from groundwater wells on port property. City and port wells are located outside of the contaminated area.

The areas of contamination in the groundwater are plumes. The plumes below the port, NuStar and KMBT are so close to each other, Ecology is considering them to be one, area-wide plume.

Cleanup plans

Ecology's previous Agreed Orders with the port and NuStar were for preparation of cleanup documents. In 2017, after the 2013 NuStar Remedial Investigation (RI) was finalized, NuStar found additional contaminants in groundwater beneath the NuStar and KMBT facilities.

The new Agreed Order addresses the recently discovered contaminants by requiring supplemental work to the 2013 RI. It also includes KMBT who Ecology has named as a potentially liable person for the site. The new Agreed Order is a legal agreement that requires the port, NuStar and KMBT to:

- Prepare a supplemental RI work plan
- Conduct a supplemental RI
- Write a supplemental RI report that addresses potential contaminants in soil, sediment and groundwater
- Include supplemental and 2013 RI information into a new Feasibility Study (FS) that compares cleanup options

The port and NuStar have been doing cleanups called interim actions since 1997 to reduce contamination. Interim actions are partial cleanups.

The port is currently cleaning up soil and groundwater polluted with chlorinated solvents from the Cadet and Swan facilities. The port has used a pump and treat system since 2009 to remove pollutants from groundwater.

NuStar is cleaning up soil, sediment, and groundwater polluted with chlorinated solvents. Since 2008, NuStar has used a vapor extraction system to remove solvent vapors in the soil. They also use enhanced bioremediation to improve the ability of naturally occurring bacteria in the ground to break down solvents and nitrates in groundwater.

The port and NuStar continue to monitor contaminant levels in groundwater to ensure interim action work is effective. NuStar is sampling sediment periodically to make sure that contaminant levels decrease as source areas are cleaned up.

Area community

The American Community Survey (ACS) data from 2011 to 2015 shows that Spanish is the most common foreign language spoken at home by persons that speak English less than “very well”. Ecology will reach out to cultural community organizations as part of our outreach and provide information in Spanish as appropriate following federal guidance.⁴ 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 Environmental Protection Agency’s (EPA) EJScreen Tool shows the following demographics for the area within a quarter-mile of the site:

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).

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 $\mu\text{g}/\text{m}^3$)	7.67	7.23	83	7.54	63	9.53	18
Ozone (ppb)	33.5	33.9	58	36.1	37	42.5	6
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	1.04	1.4	47	1.06	60-70th	0.938	60-70th
NATA* Air Toxics Cancer Risk (risk per MM)	35	40	39	39	<50th	40	<50th
NATA* Respiratory Hazard Index	2.9	2.8	53	2.8	50-60th	1.8	80-90th
Traffic Proximity and Volume (daily traffic count/distance to road)	170	450	59	380	60	600	59
Lead Paint Indicator (% pre-1960s housing)	0.53	0.23	85	0.23	87	0.29	78
Superfund Proximity (site count/km distance)	0.22	0.17	79	0.12	86	0.12	87
RMP Proximity (facility count/km distance)	2.2	0.61	94	0.63	93	0.72	92
Hazardous Waste Proximity (facility count/km distance)	4.6	1.9	89	1.5	91	4.3	89
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	8.3E-05	0.062	67	0.038	64	30	56
Demographic Indicators							
Demographic Index	49%	29%	86	29%	87	36%	72
Minority Population	42%	30%	75	27%	80	38%	61
Low Income Population	56%	29%	89	32%	87	34%	82
Linguistically Isolated Population	9%	4%	86	3%	88	4%	82
Population with Less Than High School Education	17%	9%	84	10%	83	13%	71
Population under Age 5	12%	6%	92	6%	93	6%	92
Population over Age 64	7%	14%	17	14%	16	14%	17

*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>

The Yakama Nation is a federally recognized tribe that relies on resources that could be affected by the contamination. 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 *Columbian*. 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.

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

Ecology's website and social media platforms

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

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

Document repositories

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

Vancouver Community Library
901 C Street
Vancouver, WA 98660
360-906-5106

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

To schedule an appointment to review files, please contact Susie Baxter at 360-407-6365 or Susie.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 review with other cleanup documents. We may hold comment periods longer than 30 days.

⁸ <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3450>

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

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.

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.

Plan Amendments

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We review the plan 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.

Appendices

Appendix A. Public Participation Plan Amendment Partial Site Cleanup for Port of Vancouver Cadet/Swan

Amendment to the Public Participation Plan

Ecology amended the Public Participation Plan because of a new legal agreement, Agreed Order (AO) DE 18152, was established between the Port of Vancouver (port) and Ecology. The new AO concerns the cleanup of hazardous substances at and near the Cadet/Swan part of the Port of Vancouver, Cadet/Swan, NuStar, and Kinder Morgan Site (Site). The port is the only potentially liable person (PLP) subject to this draft AO.

Washington's cleanup law, the Model Toxics Control Act (MTCA), allows the port to perform a partial Site cleanup within the Port/NuStar/Kinder Morgan Site.

Agreed Order #18152 requires the port to complete a draft Feasibility Study (FS). The FS includes cleanup alternatives specifically for cleanup of solvents that remain in soil and groundwater in and near the Cadet/Swan part of the Site. The port is also required to submit a preliminary draft cleanup action plan for the area to Ecology. Ecology will use the preliminary draft to prepare the draft Cleanup Action Plan (dCAP).

Once the draft FS and dCAP are completed, these reports and a new legal agreement to put the plan into effect will be available for public comment before Ecology finalizes them.

The investigation and cleanup evaluation of the Port/NuStar/KMBT part of the Site will continue at the same time. Ecology's objective is a complete and timely cleanup of the whole Site, while protecting the health of people and the environment.

Ecology added Appendix A to the public participation plan (plan) to give information specific to the public involvement requirements contained in Agreed Order #18152 for partial Site cleanup. This section contains only new information and does not restate the information in the original plan that is also valid for public involvement and outreach for the partial Site cleanup.

Site contacts

To be included in the site record, the public must submit public comments about the cleanup process during comment periods. We welcome questions and informal comments or information about the site's history anytime.

Ecology contacts are the following:

Southwest Regional Office
300 Desmond Drive SE
Lacey, WA 98503

Craig Rankine, site manager
Craig.Rankine@ecy.wa.gov
office: 360-690-4795 cell: 360-216-9394

Nancy Davis, public involvement coordinator
Nancy.Davis@ecy.wa.gov
office: 360-407-0067 cell: 360-489-4971

Cadet/Swan part of the Site

In 1956, the Swan Manufacturing Co. (Swan) started making electrical heaters in a leased building located at the corner of W 4th Plain Blvd and St Frances Lane. In 1964, they moved to 2500 W 4th Plain Blvd (see Figure 1). In 1972, the Cadet Manufacturing Co. (Cadet) purchased Swan. Cadet continued to make heaters. The port purchased the former Swan site in 1982. In 2006, the port acquired the Cadet property.



Figure 1. Road map showing the locations of the Cadet, Swan, NuStar, and Kinder Morgan areas of the Site.

Trichloroethylene (TCE) and other chlorinated solvents were released to soil and groundwater at the Cadet and Swan facilities. Cadet and Swan used the solvents as degreasers to clean sheet metal parts. The areas of solvent contamination in groundwater are called plumes.

Port of Vancouver Cadet/Swan, NuStar, and Kinder Morgan Site

The NuStar Terminals Services, Inc. (NuStar) and Kinder Morgan Bulk Terminals, LLC (KMBT) operations are located next to each other on the Columbia River and near the Swan/Cadet locations. NuStar and KMBT are tenants of the port. NuStar handles bulk fertilizer and other bulk products. KMBT moves copper ore and other bulk products from rail cars to ships for export.

Chlorinated solvents, such as the perchloroethylene (PCE) and TCE, polluted soil and groundwater at the GATX Terminals Corporation, the former operator at the NuStar terminal. The solvents were bulk materials handled for distribution. A groundwater plume of chlorinated solvents is located under the NuStar and Kinder Morgan operational areas.

Other contaminants are also present at the NuStar and Kinder Morgan part of the Site. These include nitrate, ammonia, copper, and other metals. NuStar, Kinder Morgan, and the port are in the process of conducting a supplemental remedial investigation to assess that contamination.

Contamination at the Site has not adversely affected city or port public drinking water supply wells. Even so, cleanup of the groundwater plume and the other contaminants is important because exposure to these substances can be harmful to human health and the environment.

Cleanup Plans

In 2009, the maximum extent of the solvent plume at the Site became known, which is outlined by a black dashed line (see Figure 2). Until recently, Ecology considered the solvent plume from the Swan/Cadet and NuStar source areas to be one area-wide plume.

The former Swan location is the two black outlined areas. The Cadet location is the red outlined area. The NuStar location is the blue outline and the KMBT location is the orange outlined area (see Figure 2).

The yellow shaded area pertains to AO DE 18152 for partial cleanup of the site by the port (see Figure 2). The NuStar and KMBT Site area not shaded yellow is not included in the draft AO DE 18152.



Figure 2. The Site outline is the maximum extent of the solvent contamination identified in 2009.

The Port has been cleaning up the Cadet/Swan area since 1998. Interim cleanups have greatly reduced solvent concentrations in soil and groundwater. Since 2009, the port has used a pump and treat system at the Swan source area to continue solvent removal from the groundwater.

Interim actions have significantly reduced the amount of TCE in groundwater over time (see Figure 3). These concentration measurements are from the intermediate depth zone, about 40 to 140 feet below the surface of the ground. TCE concentration is measured in parts per billion (ppb). One ppb is a small number, try imagining about 1 second in 32 years.

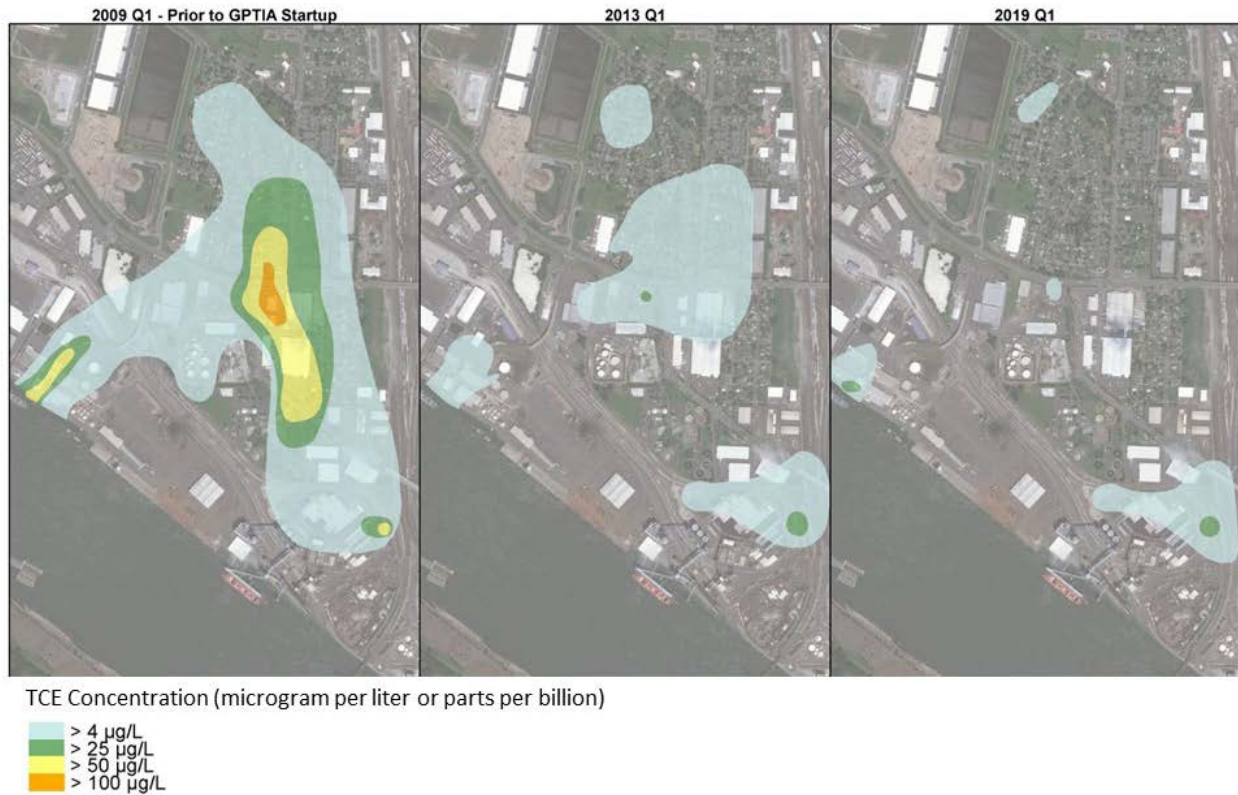


Figure 3. Reduction in the size and concentration of the TCE plume in groundwater in the intermediate depth zone over time from 2009 (left) to 2019 (right).

Area Community

The [Environmental Protection Agency's \(EPA\) EJScreen](https://www.epa.gov/ejscreen)¹⁰ (2019 Version) was used to assess population characteristics such as race, culture, language, income, and education in the affected area. EJScreen is an environmental justice mapping and screening tool that provides a nationally consistent dataset and approach that combines environmental and demographic indicators in maps and reports. This can help to highlight geographic areas and the extent to which they may be candidates for further review, including additional consideration analysis or outreach. The image below (see Figure 4) shows the demographics for the area within one quarter-mile of a location halfway between the Cadet and Swan part of the Site. This area was selected because it is in the northern section of the Site and near the area specified in Agreed Order DE 18152. This area is also adjoining the surrounding residential area.

¹⁰ <https://www.epa.gov/ejscreen>



EJSCREEN Report (Version 2019)



.25 miles Ring Centered at 45.640035,-122.696825, WASHINGTON, EPA Region 10

Approximate Population: 274

Input Area (sq. miles): 0.20

POV/Cadet-Swan

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	6.79	6.4	79	6.6	64	8.3	16
Ozone (ppb)	32	33.7	33	35.1	26	43	5
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.469	0.583	46	0.479	50-60th	0.479	60-70th
NATA* Cancer Risk (lifetime risk per million)	32	34	40	31	50-60th	32	50-60th
NATA* Respiratory Hazard Index	0.5	0.5	48	0.46	50-60th	0.44	60-70th
Traffic Proximity and Volume (daily traffic count/distance to road)	480	600	67	500	72	750	67
Lead Paint Indicator (% Pre-1960 Housing)	0.56	0.23	87	0.23	88	0.28	80
Superfund Proximity (site count/km distance)	0.15	0.19	65	0.13	76	0.13	79
RMP Proximity (facility count/km distance)	2.2	0.63	94	0.65	93	0.74	92
Hazardous Waste Proximity (facility count/km distance)	3.7	1.9	84	1.5	88	4	87
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	9.4E-05	50	64	31	60	14	54
Demographic Indicators							
Demographic Index	49%	29%	86	29%	87	36%	72
Minority Population	43%	30%	76	27%	80	39%	61
Low Income Population	55%	28%	89	31%	88	33%	83
Linguistically Isolated Population	5%	4%	75	3%	79	4%	73
Population With Less Than High School Education	17%	9%	84	9%	83	13%	71
Population Under 5 years of age	11%	6%	89	6%	90	6%	90
Population over 64 years of age	7%	14%	16	15%	14	15%	15

* 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>.

Figure 4. The environmental and demographic indicators of people living in the community within one-quarter mile from the Cadet/Swan part of the Site.

The values of demographic indicators of particular relevance to the community residing near Cadet/Swan are shown as the value (%) and percentile (%tile) in Washington. These values are estimates. A percentile is a relative term and compares the population indicator in the area near Cadet/Swan with the population of Washington. For example, if the minority population is 43% and is at the 76 percentile for the state, this means that 43% of the area's population is minority and that is equal to or higher % minority than where 76% of Washington state's population lives.

The following demographic indicators are estimated for the community near Cadet/Swan as compared with the population of the state:

- minority population is 76 percentile
- low income is 89 percentile.
- linguistically isolated is 75 percentile.
- less than high school education is 84 percentile.
- under 5 years of age is 89 percentile.
- over 64 years of age is 16 percentile

The US Census Bureau American Community Survey Summary Report for 2013-2017 estimates that 12% of the community living within ¼ mile of Cadet/Swan speak English less than very well and that the language spoken in linguistically isolated households is Spanish. Ecology will reach out to cultural community organizations as part of our outreach and provide information in Spanish as appropriate following federal guidance.¹¹ We strive to make our public participation efforts as inclusive as possible and welcome your input about how best to reach the nearby community.

The Washington Department of Health has a tool called the [Washington Tracking Network](#)¹² that compares the environmental health disparities for communities across the state by census tract or zip code. The tool estimates the cumulative environmental health impact score for each census tract reflecting pollutant exposures and factors that affect people's vulnerability to environmental pollution. The census tract within one-quarter mile of the Cadet/Swan area is given an overall environmental exposure rank of 9 on a ranking from 1 (low) to 10 (high) relative to the rest of the state. The rankings help to compare health and social factors that may contribute to disparities in a community. It is not used to diagnose a community health issue or to label a community.

The Yakama Nation is a federally recognized tribe that relies on resources that could be affected by the contamination at the Site. Ecology will provide ample opportunity to the Tribe to be involved throughout the cleanup process on a government-to-government basis.

Public Participation Activities

This plan includes information for the public regarding opportunities for public involvement and comment. The outreach activities 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.

¹¹ 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).

¹² <https://www.doh.wa.gov/DataandStatisticalReports/WashingtonTrackingNetworkWTN>

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 share information with the community. The methods used will be the same as those identified in the main body of this plan.

These methods include:

- Postal mailing list. If you would like to be added to the mailing list for this site, please contact Nancy Davis at 360-489-4971 or Nancy.Davis@ecy.wa.gov.
- Ecology's Site Register. To receive the Site Register by email, please contact Sarah Kellington at 360-407-7466 or sarah.kellington@ecy.wa.gov, or [subscribe online](#).¹³
- Newspaper display ads or legal notices. We announce public comment periods and events in ads or notices published in the *Columbian*. We will also publish notice on our [Public Input & Events Listing](#).¹⁴
- 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 Nancy Davis at 360-489-4971 or Nancy.Davis@ecy.wa.gov.
- Ecology's website and social media platforms. We maintain a [webpage for the Port, Cadet/Swan, NuStar and KMBT Site](#).¹⁵ The website provides site information and links to recent documents recently under public review. To find electronic documents pertaining to the Site, go to the Site webpage and on the right hand side under "Site Information" click on the link "View Electronic Documents".
- Our News room. We may share information about cleanup sites through news releases, blog stories, and social media available at our [News Room](#).¹⁶

¹³ <http://listserv.wa.gov/cgi-bin/wa?SUBED1=siteregister&A=1>

¹⁴ ecology.wa.gov/Events/Search/Listing

¹⁵ <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3450>

¹⁶ <https://ecology.wa.gov/About-us/Get-to-know-us/News>

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

Document repositories

At the current time (July 2020) Ecology is experiencing closures of our offices to the public due to the coronavirus (COVID-19). These suspensions are in effect until further notice. Check [our website¹⁷](#) for updates on re-opening of our buildings to the public. Staff are available by telephone and email, but our office will not be available for walk-in service at headquarters, regional, and field offices until further notice.

Closure of Ecology offices for walk-in service means that during comment periods, public review of print documents is not available. During these closures, only electronic records will be available. Thank you for your patience and understanding as we work together to defend the health and well-being of all Washingtonians.

If you have any concerns about accessing electronic documents during these closures, be sure go to the Site webpage. All documents under consideration for the comment period will be linked to the webpage. In addition, other older documents can be found by going to the Site webpage, and on the right side under “Site Information” clicking on the “View Electronic Documents” link. If you have concerns about accessing documents electronically, please contact Nancy Davis at Nancy.Davis@ecy.wa.gov.

When Ecology’s offices and public libraries reopen for walk-in service, then hard-copy repository service will resume for public comment periods. Under those circumstances, you can find print documents at the following locations:

Vancouver Community Library
901 C Street
Vancouver, WA 98660
360-906-5106

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

Once the Ecology Southwest Regional Office reopens to walk-in service at the document repository, you will be able to schedule an appointment to review files, please contact Susie Baxter at 360-407-6365 or Susie.Baxter@ecy.wa.gov.

How to share information with us

We invite the public to share information with us anytime by phone and email. During specific stages of the cleanup, we will solicit the public to share information with us. The methods used

¹⁷ <https://ecology.wa.gov/About-us/Get-to-know-us/Contact-us>

are the same as those identified in the main body of this plan (not Appendix A). These methods include:

- 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.
- 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.
- Soliciting information from interested community members and organizations. We may also identify public concerns and cleanup goals by meeting with the community. To collaborate with us about this site, please contact Nancy Davis at 360-489-4971 or Nancy.Davis@ecy.wa.gov.
- Public events. We hold public meetings, workshops, open houses, and public hearings based on community interest. During the COVID-19 pandemic, public meetings, open houses, and public hearings will be held on online. Online or in-person public meetings, workshops, open houses, and hearings are announced in advance using a variety of methods. If we have not scheduled a meeting, we will hold one if 10 people request it, which may cause us to extend a public comment period so the meeting occurs during it. Once we return to holding in-person meetings, events will be held at locations close to the site that meet Americans with Disabilities Act standards.

Plan Amendments

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We review the plan as the cleanup progresses and amend it as necessary. 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. You may suggest amendments to Nancy Davis at 360-489-4971 or Nancy.Davis@ecy.wa.gov.

Appendix B. 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.

Cleanup Action Plan (CAP): A plan that explains which cleanup option(s) will be used at a site. The Remedial Investigation and Feasibility Study provide the data and analysis to write a CAP. It also takes into account public comments and public concerns.

Comment Period: A time period during which the public can review and comment on various documents and proposed actions. For example, Ecology may hold a comment period to provide community members an opportunity 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.

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 library, school, or city hall.

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.
- 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.