

# PUBLIC PARTICIPATION PLAN

# Cadet Manufacturing and former Swan Manufacturing sites

Vancouver, Washington

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# **INTRODUCTION**

The Washington State Department of Ecology (Ecology) has developed this public participation plan pursuant to the Model Toxics Control Act (MTCA) to promote meaningful community involvement during the investigation and cleanup of the Cadet Manufacturing and former Swan Manufacturing sites. This plan outlines and describes the tools that Ecology uses to inform the public about site activities and identifies opportunities for the community to become involved.

# SITE BACKGROUND

Trichloroethylene (TCE), a solvent used in production of electric home heaters (to degrease metal before painting), was found at the Cadet Manufacturing and former Swan Manufacturing Company (SMC). TCE and other solvents entered the groundwater underneath these properties and traveled beneath the northern and southern parts of the Fruit Valley Neighborhood (FVN).

Cadet (still operating) is located at 2500 W. Fourth Plain Boulevard. In 1976, degreasing using TCE stopped. SMC was located between 2001 and 2501 W. Fourth Plain Boulevard and moved to the current Cadet site in 1964. Cadet bought SMC in 1972. The Port of Vancouver (Port) is responsible for the cleanup at the SMC site. In May 2006, the Port purchased the Cadet property and assumed cleanup responsibility for that site.

### Investigation

- The Port is actively working with Ecology investigating and cleaning up contamination at both sites. The Port and Ecology are also working with the Washington State Department of Health (DOH) to address possible public health concerns.
- Many test wells have been installed and water samples tested to evaluate the amount and location of solvents in the groundwater associated with these two sites. Results show contaminated groundwater from Cadet has traveled beneath North FVN (NFVN) and contaminated groundwater from Swan has traveled beneath the South FVN. The contamination flows together beneath the South FVN.
- The Port of Vancouver operates drinking water wells located southeast of the Swan site. These wells supply water to Port tenants and have consistently met water quality criteria. The FVN residents receive their drinking water from the City of Vancouver whose drinking water source is unaffected by the Cadet or Swan sites.

- In the **North FVN**, solvent levels are reduced in groundwater through operation of groundwater recirculating wells. These wells pump contaminated groundwater, inject it with oxidizing agent and then release treated water and excess oxidizing agent back into the ground. The excess oxidizing agent will continue to break down solvents further away from the well.
- While residents in the FVN would not normally come into contact with contaminated groundwater, these solvents can evaporate from the groundwater and enter the soil as vapors. These vapors can move through the soil toward the ground surface and, potentially, into indoor air. <u>Indoor air sampling</u> has been conducted at a number of homes in the North and South FVN.
- Results of indoor air sampling from the homes in the NFVN show solvent vapors from the contaminated groundwater were entering indoor air of some homes. A similar situation occurs in the SFVN. However, based on sampling results (from North and South FVNs) and information about the human health impacts of solvents, the DOH determined there was no immediate threat to human health at the sampled homes.
- DOH has also looked at the long-term health risks associated with the solvent levels found in homes and determined that the levels found to date are below levels where people would be expected to get sick. However, DOH will always take some action to reduce or eliminate possible exposures from the solvent-contaminated groundwater before people become ill.

For example, although no immediate health threat was found at these homes sampled in the NFVN in 2002, DOH recommended reducing or removing exposure to the solvent vapors at some homes where indoor air solvent levels were the highest found to date and it appeared likely that vapors were coming from s solvent-contaminated groundwater. To reduce exposure, Ecology requested that Cadet install solvent vapor filtration systems in six homes. Indoor air sampling in the SFVN shows the solvent vapor levels there do not need vapor filtration systems.

• Ecology and the Port are continuing to study the groundwater to indoor air pathway in both the NFVN and SFVN to see if additional indoor air testing or some action to reduce or eliminate exposure is necessary.

# **Cleanup Activity**

# Various methods (interim actions) have been or are used to reduce solvent levels in soil and groundwater at the two sites and in the Fruit Valley Neighborhood.

- At the former SMC site, most of the soil containing solvents was removed from the site.
- Solvent levels in groundwater at the **former SMC site** were reduced by soil removal and injection of oxidizing compounds. These compounds break down the solvent into non-toxic compounds like water, carbon dioxide and dissolved chloride (like in table salt).

- At the **Cadet facility**, solvent levels are reduced in groundwater using an air injection well field. Solvents move from groundwater into vapor in the soil and then are removed using vacuum wells. These same vacuum wells also remove solvents released in the soil.
- In the NFVN, solvent levels are reduced in groundwater through installation of seven groundwater Recirculating wells. These wells pump contaminated groundwater, inject it with an oxidizing agent, and then release treated water and excess oxidizing agent will continue to break down solvents even as it moves away from the well.

# MODEL TOXICS CONTROL ACT CLEANUP STAGES

The Model Toxics Control Act (MTCA) defines each stage of the cleanup process to protect human health and the environment. Figure 1 on page 6 details these stages.

Some steps described in the chart include "agreed orders" or "consent decrees". These are agreements between Ecology and the parties responsible for cleanup of the pollution. In addition to the steps in the chart, "interim actions" may be taken during steps 1 through 5 (See the Cleanup Activity section above) to reduce or eliminate pollution that poses a possible or immediate threat to human health or the environment.

The cleanup process is complex. Issues often arise that require more attention or evaluation, and may lead to changes in the steps or schedule. Every effort will be made to keep the public well-informed of changes.

#### Step 1. Site Discovery and Initial Investigation

Sites may be discovered in a variety of ways. These include reports from the owner, an employee, or concerned citizens. Following discovery, an initial investigation is conducted to determine whether or not a site needs further investigation.



#### WE ARE HERE!

#### **Step 3. Remedial Investigation**

A remedial investigation defines the nature, extent, and magnitude of pollution at a site. Before a remedial investigation starts, a detailed work plan is prepared which describes how the investigation will be done.

**Ecology is currently reviewing the Remedial Investigation Reports.** 

#### Step 4. Feasibility Study

The feasibility study takes the information from the remedial investigation and identifies and analyzes cleanup alternatives. As with the remedial investigation, a work plan is prepared which describes how the study will be done.

### **Step 5. Cleanup Action Plan**

A cleanup action plan is developed using information gathered in the remedial investigation and feasibility study. The plan specifies cleanup standards and methods. It describes the steps to be taken, including any additional environmental monitoring required during and after the cleanup, and the schedule.

#### Step 6. Cleanup

Implementation of the cleanup action plan includes design, construction, operations, and monitoring.

# PUBLIC PARTICIPATION ACTIVITIES AND RESPONSIBILITIES

The purpose of this Public Participation Plan is to promote public understanding and participation in the cleanup process for this site. This section of the plan addresses how Ecology will keep the public informed about site activities and provide opportunity for comment and involvement.

Ecology will use a variety of tools to facilitate public participation in the planning and cleanup of this MTCA site. Ecology will consider and implement input provided by the community whenever possible. The following is a list of the public involvement activities that Ecology will use, their purpose and a description of when and how they will be used in this site cleanup.

# **Formal Public Comment Period**

Comment periods are the primary method Ecology uses to get feedback from the public on proposed cleanup decisions. Comment periods usually last for 30 days and are required at key points during the cleanup process before final decisions are made. During a comment period, the public can comment in writing (email or letter) or in person (during a public meeting or hearing).

# **Public Meetings and Hearings**

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

### **Responsiveness Summaries**

After every public comment period, Ecology reviews and may respond to all comments received, both oral and written. These comments are compiled into a responsiveness summary. Ecology considers changes or revisions to plans or reports based on the input from the public. If significant changes occur as a result of public comment, then a second comment period is held. The draft documents will then be finalized. The responsiveness summary will be available upon request and included with the other related site documents in the Information Repositories listed below.

### **Information Repositories**

Information repositories are convenient places where the public can go to read and review site information. The information repositories are often at libraries or community sites where public has access. During the comment period, the site documents will be available for review at each repository. Each site will have at least two repository sites established. Site information will remain at repositories for the duration of the cleanup. Ecology's Central files can also make copies of the documents for a fee.

The information repositories for this site are:

#### Washington State Department of Ecology

Southwest Regional Office Toxics Cleanup Program 300 Desmond Dr. Lacey, WA 98503 (360) 407-6365

#### Vancouver Regional Library

1007 E. Mill Plain Blvd. Vancouver, WA 98663 (360) 695-1566

### **Mailing list**

Ecology has compiled a list of interested parties and organizations and residents living near the cleanup site. This list will be used to distribute information via mail (fact sheets, site updates, public notices). If you wish to be added to the mailing list, please contact Meg Bommarito at (360) 407-6255 or by email at mbom461@ecy.wa.gov.

#### Site Register and Public Events Calendar

Ecology's Toxics Cleanup Program uses its bimonthly Site Register and web-based Public Involvement Calendar to announce all of its public meetings and comment periods as well as additional site activities. To receive the Site Register in electronic or hard copy format, contact Linda Thompson at (360) 407-6069 or by email at ltho461@ecy.wa.gov. It is also available on Ecology's website at http://www.ecy.wa.gov/programs/tcp/sites/8801/8801\_hp.html.

#### **Fact Sheets / Updates**

Ecology will mail out fact sheets to persons and organizations interested in the Cadet and Swan Manufacturing sites to inform them of public meetings and comment periods as well as important site activities. Ecology may also mail updates about the progress of site activities.

#### **Newspaper Display Ads**

Ecology may place ads in the local paper to announce public comment periods and public meetings or hearings for this site. *The Columbian* will be used to publish information about this site.

### **Ecology Web Site**

Information related to this site and materials available for public comment will be posted on Ecology's web site at http://www.ecy.wa.gov/programs/tcp/sites/cadet/cadet\_hp.htm.

## **Public Participation Grants**

Grants may be available to neighborhood committees, non-profits, and other groups near the site. These funds may be used to provide additional public involvement, to receive technical assistance, and/or to help the public to understand the cleanup process. For more information, please contact Kathy Seel at (360) 407-6061 or Ksee461@ecy.wa.gov, or visit Ecology's Solid Waste and Financial Assistance Program website: www.ecy.wa.gov/programs/swfa/grants.html

### **Translation Service**

Ecology will provide translation services to any resident who requests them. This service can include written material, live translation during public meetings or telephone inquiries. Please contact Meg Bommarito, Public Involvement Coordinator, at (360) 407-6255 or mbom461@ecy.wa.gov for a translated copy of this or any other documents related to this site.

### **Plan Updates**

This Public Participation Plan is meant to be a dynamic guide for informing and involving the community in the decision-making process at the Site. This plan may be updated as the project proceeds.

#### **Public Points of Contact**

For project-related questions, contact Craig Rankine at the Washington State Department of Ecology at (360) 690-4795 or by email at cran461@ecy.wa.gov.

For copies of this document or questions about public involvement, contact Meg Bommarito at the Washington State Department of Ecology at (360) 407-6255 or by email at mbom461@ecy.wa.gov.

For health-related questions, contact Barbara Trejo, Washington State Department of Health at 1-877-485-7316 (toll free) or Barbara.Trejo@doh.wa.gov.

Figure 2. Cadet and Swan Manufacturing site



# Map Legend



Figure 3. Additional photos of Cadet Manufacturing and former Swan Manufacturing site

