



DEPARTMENT OF
ECOLOGY
State of Washington

Public Participation Plan

USG Interiors, LLC

1005 River Road E, Puyallup, Washington

Facility Site ID: 1217

Cleanup Site ID: 3634

January 2019

Publication 19-09-117

Publication and Contact Information

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

<https://fortress.wa.gov/ecy/publications/summarypages/1909117.html>

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Public Participation Plan

USG Interiors, LLC

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 USG Interiors, LLC (USG), the party responsible for cleanup costs. 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 to implement the cleanup action plan developed for the USG Interiors, LLC Puyallup site (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

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Lacey, WA 98503

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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.

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 (SEPA)

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

Site History

Land use

The USG site is located at 1005 River Road East in Puyallup, Washington. It is 1.58 acres and consists of four USG-owned tax parcels that include portions of the Bonney Lake Used Cars property to the west, Market Place Auto property to the east, and Pierce County's Inter-County River Improvement Right-of-Way to the north. The Riverwalk Trail, a paved path at the top of the river bank is used for biking and walking. Currently, there are no plans for future land use at the site.

Contamination

Prior to 1971, the USG facility used slag from the former Tacoma Asarco copper smelter as a raw material to produce rock wool, a mineral fiber insulation. The manufacturing waste that consisted of "baghouse dust" and "shot", was used as fill on the site to raise the grade. In the 1980s, USG learned that the slag and waste contained high concentrations of arsenic, and had contaminated soil, sediments in the Puyallup River, and groundwater.

In 2006, Ecology required USG to conduct soil and groundwater assessment for arsenic. This assessment showed that arsenic in soil and groundwater exceeded MTCA Method A cleanup standards.

What is Rock Wool?

Rock wool is an insulating and fire proofing material. It is made by heating rock until it is molten and blowing or spinning it into fine fibers.

Arsenic is a toxic metal. It can occur naturally in the soil or come from industrial processes. Arsenic can be harmful to human health. For more information visit: <https://www.atsdr.cdc.gov/toxfaqs/faq.asp?id=19&tid=3>

Slag is a hard, glassy material containing elevated concentrations of arsenic, lead, and other metals. It was produced during copper smelting at Asarco.

Cleanup plans

In 1984, USG entered into an Agreed Order to assess groundwater contamination on the site. Between 1984 and 1985, USG removed contaminated soil and disposed of it at a hazardous landfill. Ecology required USG to monitor the groundwater after the cleanup. In 2006, USG conducted a site assessment and found soil and ground water with arsenic concentrations above the state Model Toxics Control Act (MTCA) cleanup levels. In 2007, USG conducted a Remedial Investigation and Feasibility Study (RI/FS). Now, Ecology and USG are proposing to address the remaining contamination.

The current Agreed Order DE 11098 requires USG to implement and maintain the Cleanup Action Plan (CAP) selected by Ecology. The proposed cleanup action involves treatment of soil, sediment, and groundwater with a combination of solidification/stabilization techniques, excavation and off-site disposal, and institutional controls. USG will:

- Solidify/chemically stabilize the arsenic within soil by injecting a cement-based mixture.
- Treat groundwater using in-situ chemical oxidation (see figure below). Ferrous iron and oxidant chemicals will be injected into trenches or directly into the arsenic plume and in and around an arsenic “hot spot”. A “hot spot” is a small area with the highest levels of contamination.
- Excavate contaminated sediment from the Puyallup River riverbank. Material exceeding state standards will be disposed of at an appropriate landfill. The river bank will later be restored.
- Apply land and groundwater use restrictions (environmental covenants) to protect human health and the environment since hazardous substances will be contained at the site.
- Submit a monitoring plan to make sure cleanup levels are reached.

In-Situ Chemical Oxidation (ISCO)

The cleanup plan proposes treating groundwater with ISCO. This will help speed up the natural attenuation of arsenic. Natural attenuation relies on natural physical, chemical, or biological processes to lower contamination over time.

In ISCO, a chemical called an “oxidant” is injected into groundwater, usually through wells. Then a chemical reaction happens between naturally occurring iron, oxygen, and the arsenic. This changes the arsenic to a less mobile form. Oxidants that can be used include potassium or sodium permanganate, sodium persulfate, ozone or hydrogen peroxide.

The benefit of ISCO is it’s “in situ”, meaning it can be done in place without excavating soil or pumping and treating groundwater. For this site, it may also reduce the ability of arsenic in the soil “hot spot” to leach into the groundwater.

Area community

The site is located in the northwest quadrant of the city of Puyallup on River Road in a mostly commercial area. There are many vacant lots, car dealerships, and some retail establishments. Within the two census tracts surrounding the site, American Community Survey (ACS) data from 2011 to 2015 data shows that Spanish is the most common foreign language spoken at home by persons that speak English less than “very well”. Other languages spoken include Tagalog and

Arabic. Ecology will reach out to cultural community organizations as part of our outreach and provide information in other languages as appropriate following federal guidance.⁴ 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 Environmental Protection Agency’s (EPA) EJScreen Tool shows the following demographics for the area within a quarter-mile of the site:

Table 1. Environmental and demographic information for the area surrounding USG Interiors LLC

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 µg/m ³)	7.1	7.23	45	7.54	33	9.53	9
Ozone (ppb)	34.7	33.9	68	36.1	50	42.5	8
NATA* Diesel PM (µg/m ³)	1.75	1.4	75	1.06	80-90th	0.938	90-95th
NATA* Air Toxics Cancer Risk (risk per MM)	45	40	66	39	60-70th	40	60-70th
NATA* Respiratory Hazard Index	3.2	2.8	61	2.8	60-70th	1.8	90-95th
Traffic Proximity and Volume (daily traffic count/distance to road)	540	450	79	380	81	600	79
Lead Paint Indicator (% pre-1960s housing)	0.37	0.23	76	0.23	77	0.29	67
Superfund Proximity (site count/km distance)	0.037	0.17	45	0.12	51	0.12	40
RMP Proximity (facility count/km distance)	0.68	0.61	71	0.63	70	0.72	67
Hazardous Waste Proximity (facility count/km distance)	2.8	1.9	80	1.5	85	4.3	83
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0035	0.062	86	0.038	86	30	75
Demographic Indicators							
Demographic Index	32%	29%	65	29%	65	36%	53
Minority Population	23%	30%	47	27%	54	38%	43
Low Income Population	42%	29%	75	32%	71	34%	67
Linguistically Isolated Population	0%	4%	42	3%	46	4%	44
Population with Less Than High School Education	8%	9%	56	10%	53	13%	43
Population under Age 5	10%	6%	81	6%	82	6%	82
Population over Age 64	9%	14%	26	14%	25	14%	25

*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 Puyallup Tribe is a federally recognized tribe that owns land or relies on resources that could be affected by the 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.

According to the *Puyallup Comprehensive Plan (2015)*, *River Road Corridor Plan*, the area of River Road surrounding the site will remain auto-oriented, commercial land. An important focus of the plan is create better access to the Riverwalk Trail as a bike and walking path. The Trail will connect to regional destinations along Pierce County's Foothills Trail and the Interurban Trail.

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).

Public Participation Activities

Members of the public are invited to 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 decision-making process regarding cleanup.

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.

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 1/4-mile radius of the site and relevant local, state, and federal government contacts.

These people receive public comment notices when documents for review 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 Cheryl Ann Bishop at 360-407-6848 or Cherylann.Bishop@ecy.wa.gov, or [subscribe online](#).⁶

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 [USG Interiors, LLC site](#).⁸ The website provides site information, and links to download cleanup documents.

We may also share information about the cleanup site 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:

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

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

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

⁸ <https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=3634>

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

Pierce County Library
1000 Laurel St
Milton, WA 98354

Tacoma Main Library
1102 Tacoma Avenue South
Tacoma, WA 98402

Citizens for a Healthy Bay
535 Dock St Suite 213
Tacoma, WA 98402
(253) 383-2429

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

To schedule an appointment, 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 review of draft cleanup documents and 14-day comment periods for review of SEPA documents. SEPA documents are often made available for review with other cleanup documents. We may hold comment periods for 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.

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 the documents 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 (e.g., postal mailing lists, email lists, Ecology's website and social media platforms, document repositories, and signs around the cleanup site).

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.

If you feel the planned outreach activities and methods described in this plan are insufficient, or should be modified, we will work to find solutions. Implementing new solutions for outreach activities or methods can be carried out right away, with or without amending this plan.