

Draft Public Participation Plan: U.S. Army Yakima Training Center

Yakima, Washington

Hazardous Waste and Toxics Reduction Program

Washington State Department of Ecology

Central Region Office

Union Gap, Washington

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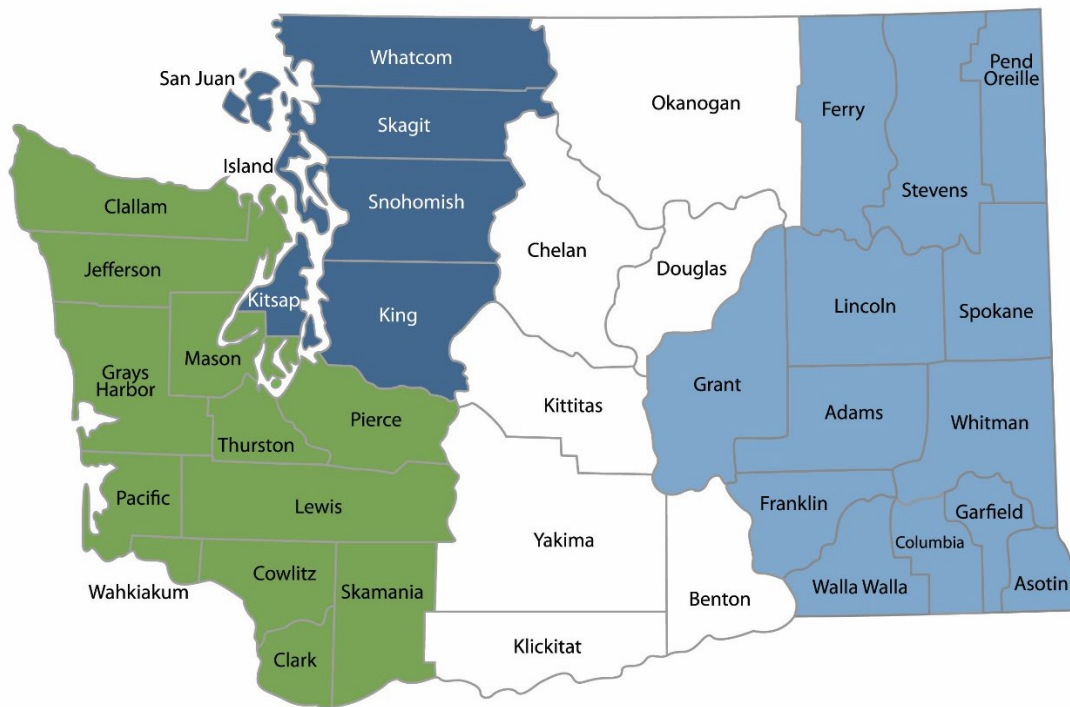
Español

Para solicitar una copia de este documento en español, por favor comuníquese con Sheila Coughlan al (360) 480-7127 o Sheila.Coughlan@ecy.wa.gov.

² <https://ecology.wa.gov/Accessibility>

Department of Ecology's Region Offices

Map of Counties Served



Southwest Region
360-407-6300

Northwest Region
206-594-0000

Central Region
509-575-2490

Eastern Region
509-329-3400

Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

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DEPARTMENT OF
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State of Washington

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Public Involvement in Contamination Cleanup

The Washington State Department of Ecology (Ecology) developed this public participation plan (plan) for the U.S. Army (Army), the party responsible for cleanup costs. The purpose of the plan is to promote 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

Hazardous Waste and Toxics Reduction Program

Central Region Office
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Union Gap, WA 98903
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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 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. The cleanup must be to standards that are safe for human health and the environment.

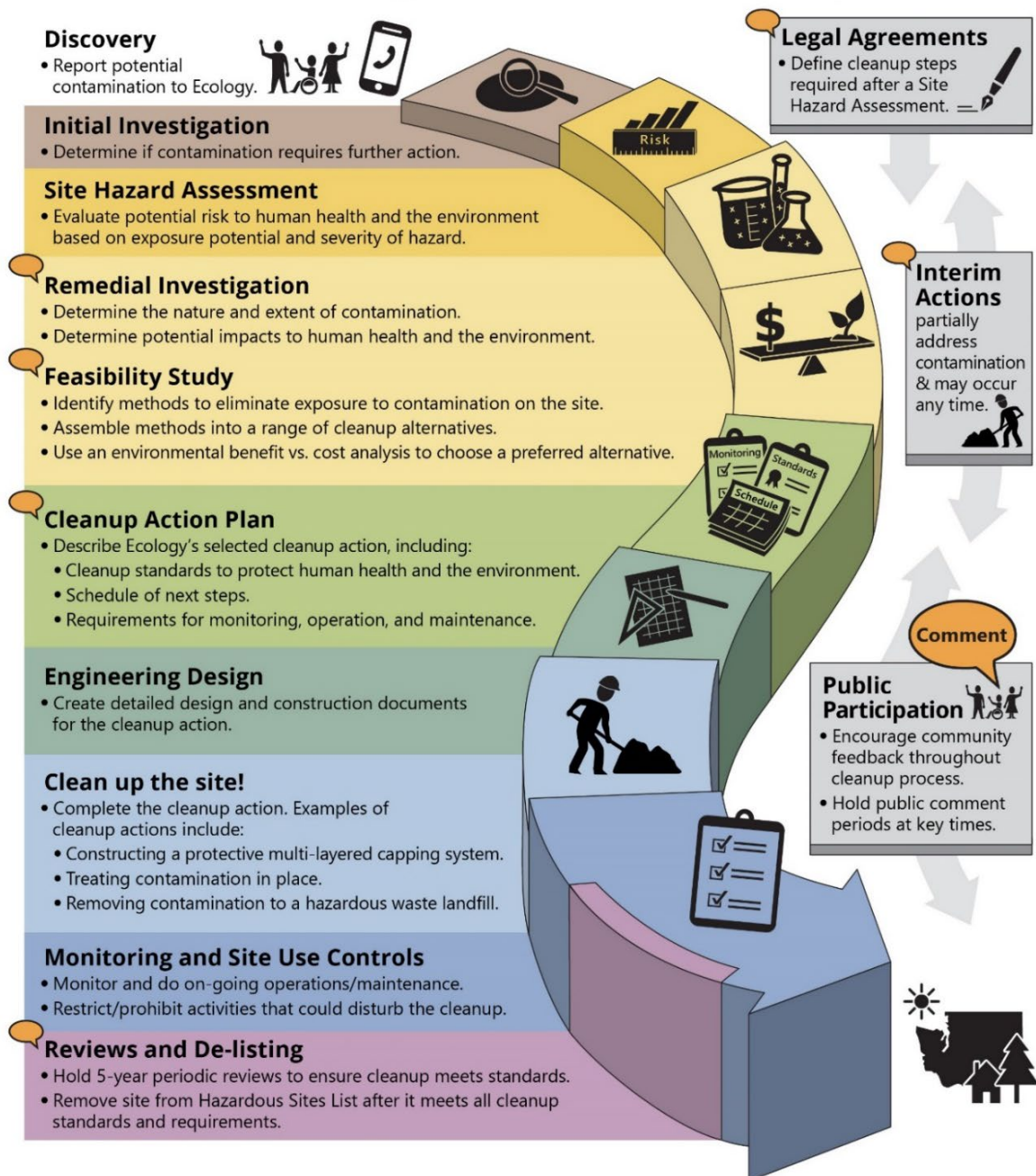
Ecology enacts MTCA and oversees cleanups in the state and issues regulations and guidance governing those cleanups. The regulations are found in [Chapter 173-340 Washington Administrative Code \(WAC\)](#).³ Ecology investigates reports of property contamination, and if the contamination is seen as a significant threat to human health or the environment, the contaminated property is placed on the Confirmed and Suspected Contaminated Sites List for further assessment. The cleanup process can begin at any time after a release of a hazardous substance to the environment has been discovered.

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 the MTCA, the cleanup process generally includes multiple steps (see Figure 1 on page 8), with opportunities for the public to review and comment on cleanup documents. In addition, a partial cleanup (called an interim action) can occur at any time during the cleanup process. The public is provided an opportunity to review and comment on planned interim action work as well.

³ <https://apps.ecology.wa.gov/publications/publications/9406.pdf>

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

Figure 1. Steps in Washington's cleanup process. [Read a plain text version.](#)⁴

⁴ <https://apps.ecology.wa.gov/publications/parts/1909166part2.pdf>

RCRA and hazardous waste regulations

There are federal and state regulations governing hazardous waste management. The United States Congress enacted the Resource Conservation and Recovery Act (RCRA), an amendment to the Solid Waste Disposal Act of 1976, to ensure safe management and disposal of municipal and industrial waste nationwide. RCRA has been amended several times, including in 1984 with the Hazardous and Solids Waste amendments that expanded its scope and requirements.

RCRA's goals are to:

- Protect human health and the environment.
- Reduce waste and conserve energy and natural resources.
- Reduce or eliminate generation of hazardous waste as quickly as possible.

Cradle-to-grave is a program established by RCRA Subtitle C that handles waste from the moment of generation to the final disposal. Owners and operators of waste treatment, storage, and disposal (TSD) facilities must submit a permit application covering all aspects of design, operation, maintenance, and closure of the facility. RCRA requires owners and operators of these facilities to clean up contamination resulting from operations, including contamination from previous owners. We call these cleanup activities corrective action. RCRA requires permits for all facilities that treat, store, or dispose of hazardous wastes.

The permit application is divided into two parts: Part A and Part B. In 1980, the Army submitted Part A of the permit application. Part A listed the types, amounts, and locations of where hazardous wastes are generated at Yakima Training Center.

In 1985, the Army submitted Part B of the RCRA application, requesting a permit for a new hazardous waste treatment unit: Range 14 Unserviceable Munitions Treatment Unit (UMTU). The UMTU was used to dispose of out-of-date ammunition at a firing range.



Figure 2. Out-of-date ammunition disposal at Yakima Training Center firing range.

In 2003, after a long public process, the Army decided to close the UMTU and not pursue a RCRA permit. Because the Army applied for a RCRA permit and operated the UMTU, it is subject to RCRA corrective action for the entire site. The new permit for corrective action covers how the contamination at the site will be addressed.

Federal RCRA and state regulations require public participation throughout the permitting and cleanup of waste management facilities.

State Environmental Policy Act

MTCA cleanups also require evaluation under the State Environmental Policy Act (SEPA; [Chapter 197-11 WAC](#)⁵). Under SEPA, the potential for significant adverse environmental impacts from a project or action must be evaluated by state and local agencies when making decisions. This evaluation is subject to public review and comment in parallel with cleanup documents.

⁵ <https://apps.leg.wa.gov/wac/default.aspx?cite=197-11>

Site Information

Location and background

The Yakima Training Center (YTC) is located in the south-central portion of Washington State, bound on the west by Interstate 82, to the south by the city of Yakima, to the north by the city of Ellensburg and Interstate 90, and to the east by the Columbia River.



Figure 3. Google map showing the location of Yakima Training Center.

The terrain is mostly rolling hills and mountains that consist of three east-west parallel ridges: Manastash Ridge, Umtanum Ridge, and Yakima Ridge. These ridges are all part of the Yakima Fold Belt near the western edge of the Columbia River Plateau.

YTC is a sub-installation of Joint Base Lewis-McChord (JBLM), located approximately 100 air miles east of JBLM and about 10 miles north of the city of Yakima. It encompasses 327,231 acres within Yakima and Kittitas Counties. The YTC population is mostly soldiers performing maneuvers and weapons training with no permanent residents.

YTC has been in use for military training since 1941. It houses several military or federal government tenants, including the State of Washington Army National Guard Materials and Training Equipment Site, and Marine and Army Reserve Centers.

The United States Army is the owner, and JBLM is and has been the operator of the dangerous waste management facility at the Yakima Training Center.

Why this site matters

Ecology has worked with the Army for the past several years to create a legal agreement to clean up contamination. The Army has opted to not sign a legal agreement and to proceed without Ecology's participation or oversight.

Beginning in 2020, the Army began testing drinking water wells on and around the YTC for per- and polyfluoroalkyl substances (PFAS). Firefighting foams that contain PFAS have been used on the base. This use has contaminated groundwater, including off-base drinking water wells west of YTC. Currently, the Army is conducting investigations and drinking water mitigation efforts (such as providing bottled water for drinking and cooking), without public review or Ecology oversight. Ecology will be closely monitoring the Army's activities to ensure the investigation and cleanup efforts protect both the environment and human health.

How the site became contaminated

Past military and maintenance activities resulted in multiple releases to soil and groundwater. A 1995 facility assessment report identified 115 known or potentially polluted areas within YTC. Most of these contaminated areas are near the southwest border of the base, near East Selah. By 2013, all the areas had been investigated and over 80 percent had been cleaned up with Ecology oversight. However, there are still more areas to clean up at YTC. These areas do not meet soil or groundwater cleanup standards or have yet to be properly investigated.

Contamination

Chemical and toxic waste products include:

- Petroleum-based fuels (gasoline, diesel, and Jet-A).
- Solvents such as trichloroethylene (TCE) and methyl ethyl ketone (MEK).
- Lead-acid batteries from vehicles.
- Ordnance, explosives, and other pyrotechnics, including unused or outdated ammunition and weapons.
- Per- and polyfluoroalkyl substances (PFAS) used in firefighting foams.

Cleanup plans

In 2023, Ecology issued an enforcement order (EO) and a corrective action permit to the U.S. Army, the party responsible for the cleanup costs. The EO requires the liable parties to:

- Investigate and characterize the site.
- Evaluate cleanup options and produce a feasibility study.
- Create a cleanup action plan (CAP).

Design and performance of the work in the CAP will occur under a separate legal agreement. All legal agreements will be issued for public review and comment. We welcome informal comments, questions, or information about the site's history at any time. To be included in the formal site record, comments about these documents or the cleanup process must be submitted online or in writing during the formal comment periods.

The permit for corrective action addresses how the army will clean up contamination remaining throughout the site.

Area community

Neighborhood

YTC is a large property surrounded by several towns, cities, and rural communities. The Yakima Valley is known as one of the leading producers of apples. The region is also used recreationally for fishing, river tubing, skiing, and snowmobiling.

YTC is crossed by John Wayne Pioneer Trail (Figure 4), which is used as a non-motorized recreational trail. The former railroad tracks cover 300 miles across two thirds of Washington State from the Cascade Mountains to the border of Idaho.



Figure 4. John Wayne Pioneer Trail.

The federally recognized Yakama Nation relies on resources that could be affected by the contamination. Ecology will ensure that the Tribe is engaged with any decision-making process for this site and has ample opportunity to be involved throughout the process on a government-to-government basis. Our communication with the Yakama Nation will follow the terms outlined in the memorandum of understanding (MOU) between the two parties. The

purpose of the MOU is to ensure the protection of human health and the environment resulting from releases of hazardous substances from facilities within Washington. It outlines the responsibilities and coordination commitments and policy for dispute resolution.

Socioeconomic factors such as limited English, education, and people of color

The [Washington Environmental Health Disparity Map](#)⁶ rates every census tract in Washington State for environmental risk factors. Environmental risk is based on a formula of Risk = Threat × Vulnerability. Each community is ranked on a scale of 1 to 10. The higher the rank, the greater the impact. These rankings reflect the fact that people in communities that have lower incomes, less access to education and healthcare, and poorer overall health also shoulder a disproportionate share of the burden of environmental pollution.

The yellow lines on Figure 5 show the borders of two census tracts (53077001701, 53037975700). YTC is divided almost in half into two north-south census blocks, with the Columbia River to the east and Interstate 82 to the west. The north census block is bounded by Ellensburg and Interstate 90 to the north. The south census block is bounded by Yakima and State Route 24 to the south.

The south census tract and nearby Selah have an environmental risk rank of 8. This community is most impacted by socioeconomic factors, such as people with education that is short of a high school diploma, limited English proficiency, poverty, and hardship related to transportation expenses. A ranking of 8 means that 70 percent of other communities in the state are less impacted, 10 percent are similarly impacted, and 20 percent are more impacted by the same socioeconomic factors.

The northern census tract has an environmental risk rank of 5.

⁶ <https://fortress.wa.gov/doh/wtnibl/WTNIBL/>

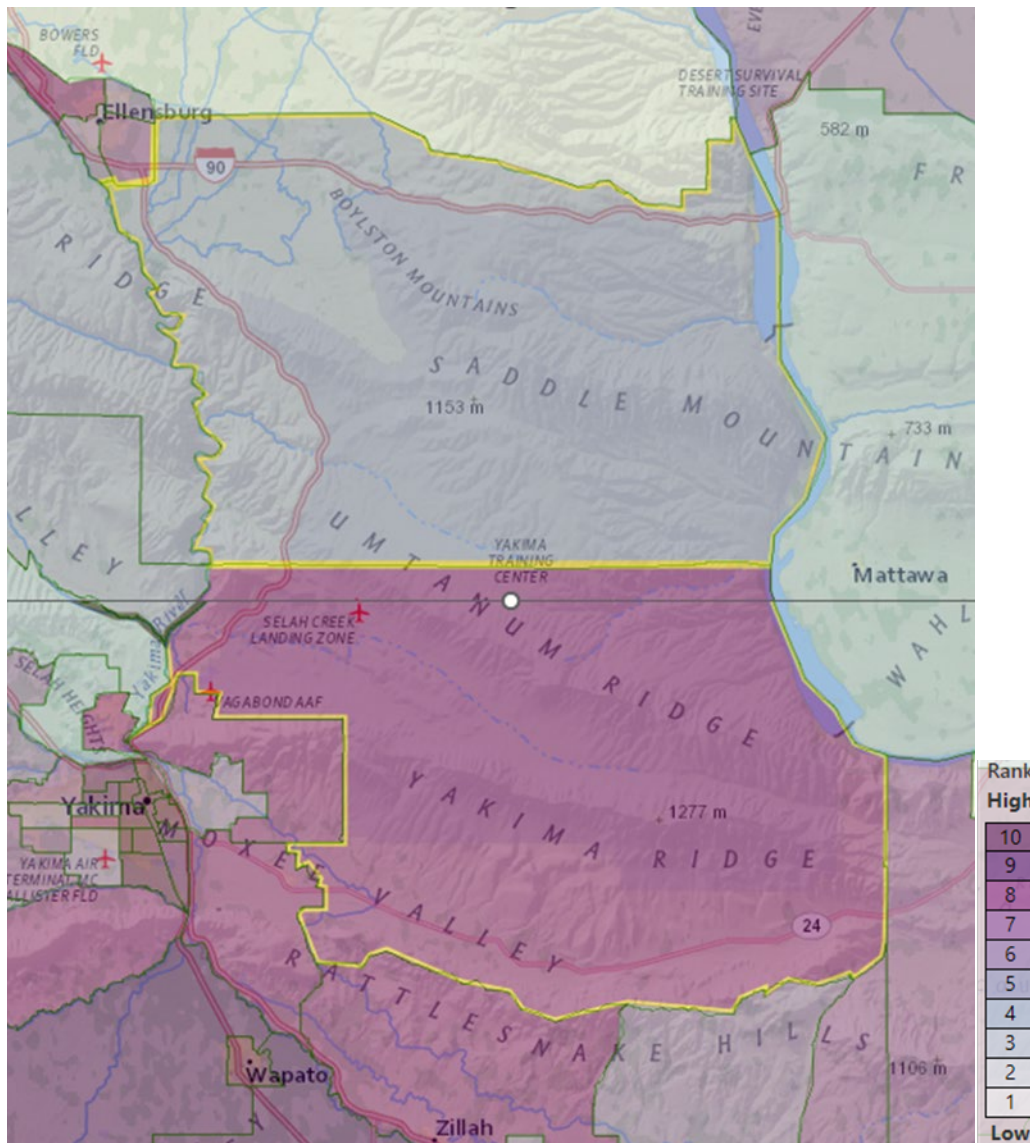


Figure 5. Washington's environmental health disparities map for Yakima Training Center.

Environmental justice

The data below was generated for a two-mile area around the site using the Environmental Protection Agency's [Environmental Justice Screening and Mapping Tool](https://ejscreen.epa.gov/mapper/index.html) (EJScreen).⁷ This tool compares a census block group to the rest of the state. YTC is located within two census blocks. The census block for the southern part of the site reveals a diverse, economically challenged, and linguistically isolated population. Reaching underserved people within the project area is a priority.

⁷ <https://ejscreen.epa.gov/mapper/index.html>

Demographic Indicators above the EPA 80th percentile threshold for the southern census block:

- People of color – 80th percentile
- Less than high school education – 92nd percentile
- Under age 5 – 85th percentile
- Low income – 81st percentile
- Limited English speaking - 90th percentile

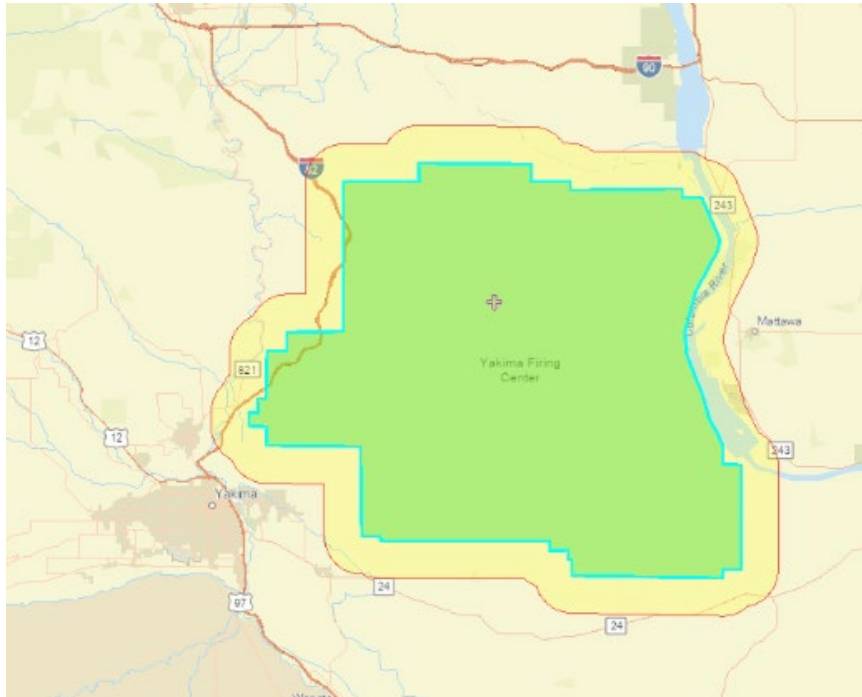


Figure 6. EPA's EJScreen⁸ map of the outreach impact for this project.

Ecology will contact cultural and community organizations as part of our outreach and provide information in other languages as appropriate, following federal guidance.⁹ The non-English language most widely spoken in the area is Spanish. Based on census block demographic data, we will translate our documents about public comment periods into 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.

⁸ <https://ejscreen.epa.gov/mapper/index.html>

⁹ 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 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 and include 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 one is 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 may be of community interest.

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

Postal mailing list

Ecology maintains a mailing list that includes addresses within a two-mile radius of this site to help reach the bulk of nearby residents 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, Senior Public Involvement Coordinator, at (360) 480-7127 or email Sheila.Coughlan@ecy.wa.gov.

Site Register

Public comment periods, events, and other cleanup notices are published in Ecology's [Site Register](#).¹⁰ To receive the *Site Register* by email, please [subscribe online](#),¹¹ or contact Sarah Kellington at sarah.kellington@ecy.wa.gov or 360-407-7466.

Newspaper display ads or legal notices

We announce public comment periods and events in ads or notices published in the [Yakima Herald](#),¹² the [Ellensburg Daily Record](#),¹³ [El Sol de Yakima](#),¹⁴ and in the weekly newspapers put out by [NW Military News](#).¹⁵ We will also publish notices on our [Public Input & Events Listing](#).¹⁶

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, Senior Public Involvement Coordinator, at (360) 480-7127 or email Sheila.Coughlan@ecy.wa.gov.

Ecology's website and social media platforms

We maintain a website for the [Yakima Training Center site](#).¹⁷ 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](#).¹⁸

Document repositories

During public comment periods when review locations are accessible, you can find print documents at the following locations:

Yakima Valley Central Library
102 North 3rd Street
Yakima, WA 98901
(509) 452-8541

**Washington Department of Ecology
(by appointment only)**
Central Region Office
1250 West Alder Street
Union Gap, WA 98903
Phone: (509) 575-2490

¹⁰ ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data

¹¹ public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_118

¹² yakimaherald.com

¹³ dailyrecordnews.com

¹⁴ elsoldeyakima.com

¹⁵ northwestmilitary.com/news

¹⁶ ecology.wa.gov/Events/Search/Listing

¹⁷ ecology.wa.gov/YTC

¹⁸ ecology.wa.gov/About-us/Who-we-are/News

To schedule an appointment, please contact the Central Region Office central records staff at (509) 208-4591 or Jacklyn.Cooper@ecy.wa.gov.

When locations listed above are not accessible, please contact Ecology for document review assistance: Sheila Coughlan (360) 480-7127 or Sheila.Coughlan@ecy.wa.gov.

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 Sheila Coughlan, Senior Public Involvement Specialist, at (360) 480-7127 or email Sheila.Coughlan@ecy.wa.gov.

Public comment periods

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

Following a comment period, we publish all the input we received and respond to significant comments and questions, as appropriate. 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 may hold in-person and online 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. 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.

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 information¹⁹
- Conduct activities that enhance the public's understanding of the cleanup process

For information about public participation grants, contact Faith Wimberley at 425-275-7285 or faith.wimberley@ecy.wa.gov. You may also visit the [Public Participation Grant website](#).²⁰

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 360-407-6700 or hwtrpubs@ecy.wa.gov, or visit ecology.wa.gov/accessibility. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

Plan Amendments

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We review it as the cleanup progresses and amend it as necessary. You may suggest amendments to Sheila Coughlan, Senior Public Involvement Coordinator, at (360) 480-7127 or email 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.

¹⁹ 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.

²⁰ ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants