

## **PUBLIC PARTICIPATION PLAN**

**CAPITAL INDUSTRIES, INC.  
5801 THIRD AVENUE SOUTH  
SEATTLE, WASHINGTON**


**AGREED ORDER NO. DE 5348**

**Submitted by:  
Farallon Consulting, L.L.C.  
975 5th Avenue Northwest  
Issaquah, Washington 98027  
Farallon PN: 457-004**

**For:  
Mr. Ron Taylor  
Capital Industries, Inc.  
5801 Third Avenue South  
Seattle, Washington**

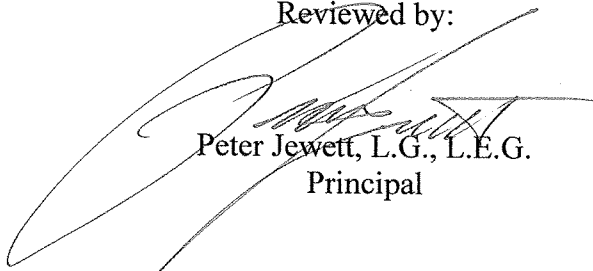
September 16, 2008

Prepared by:

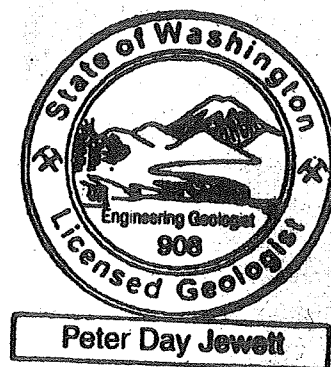


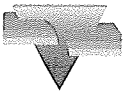
Dan Caputo  
Project Chemist

Reviewed by:



Peter Jewett, L.G., L.E.G.  
Principal





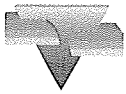
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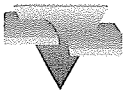
Figure 1 *Capital Area of Investigation Location Map*

Figure 2 *Capital Areas of Investigation Public Participation Plan*



## ACRONYMS AND ABBREVIATIONS

ABP	Art Brass Plating
Agreed Order	Agreed Order No. DE 5348 between the Washington State Department of Ecology and Capital Industries, Inc.
ARARs	applicable or relevant and appropriate requirements
BDC	Blaser Die Casting
bgs	below ground surface
Capital	Capital Industries, Inc.
cis-1,2-DCE	cis-1,2-dichloroethene
COPCs	constituents of potential concern
Ecology	Washington State Department of Ecology
ECS	Environmental Consulting Services
EPA	U.S. Environmental Protection Agency
Farallon	Farallon Consulting, L.L.C.
FSM	Floyd Snider McCarthy, Inc.
HVOCs	halogenated volatile organic compounds
IPIM	Inhalation Pathway Interim Measure
MTCA	Washington State Model Toxics Control Act Cleanup Regulation
PCE	tetrachloroethene
PGG	Pacific Groundwater Group
PID	photoionization detector
PPP	Public Participation Plan
PSC	Philip Services Corporation
RCRA	Resource Conservation and Recovery Act
RI	Remedial Investigation
RI Work Plan	Remedial Investigation Work Plan
SSDS	Sub-Slab Depressurization System
TCE	trichloroethene
trans-1,2-DCE	trans-1,2-dichloroethene
VOCs	volatile organic compounds
WAC	Washington Administrative Code



## **1.0 INTRODUCTION AND OVERVIEW**

This Public Participation Plan (Plan) has been prepared by Farallon Consulting, L.L.C. on behalf of Capital Industries, Inc. (Capital) to encourage a coordinated effort and effective public involvement tailored to the public's needs concerning the Remedial Investigation at the Capital Area of Investigation in Seattle, Washington. The Capital Area of Investigation is defined as the area between south of South Mead Street and South Front Street and between 1<sup>st</sup> Avenue South and 4<sup>th</sup> Avenue South. In accordance with Agreed Order No. 5348 (Agreed Order) entered into between Capital and the Washington State Department of Ecology (Ecology) on January 24, 2008, the Capital Site will be defined by the extent of hazardous substances above regulatory cleanup levels released from the Capital Property located at 5801 3<sup>rd</sup> Avenue South in Seattle, Washington.

This Plan has been prepared in accordance with criteria set forth in the Washington State Model Toxics Control Act Cleanup Regulation (MTCA), Chapter 70.105D of the Revised Code of Washington. The regulations for implementing Public Participation are established in Chapter 173-340-600(9)(g) of the Washington Administrative Code (WAC 173-340-600[9][g]).

The purpose of the Plan is to keep appropriate governmental officials, persons residing within close proximity of the Capital Area of Investigation, interested persons visiting the Capital Site, and other persons requesting information about the Capital Area of Investigation informed, and to provide an avenue to solicit and respond to public concerns. In accordance with WAC 173-340-600(9)(g), the Plan includes a description of each of the following:

- Public Notice;
- Responsiveness Summary;
- Amendments to the Plan; and
- Coordination of Plan Requirements.

### **1.1 GOAL AND OBJECTIVES**

The goal of this Plan is to promote public understanding of the proposed Remedial Investigation for the Capital Area of Investigation. The main objectives of this Plan are to:

- Meet the requirements of the Agreed Order and MTCA;
- Invite and encourage interaction and collaboration among the community, Ecology, and potentially liable persons; and
- Solicit and respond to community concerns, questions, and comments.



## 2.0 SITE DESCRIPTION AND BACKGROUND

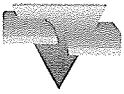
The following section includes a description of the Capital Area of Investigation, a discussion of the constituents of potential concern (COPCs) and affected media, and a description of the proposed Remedial Investigation. The results of previous investigations conducted on the Capital Property located at 5803 3<sup>rd</sup> Avenue South detected concentrations of halogenated volatile organic compounds (HVOCs) in soil and groundwater above applicable MTCA cleanup levels on the Capital Site (see Section 2.3). A detailed discussion of Capital Property conditions, previous investigations, feasibility studies, and the proposed Remedial Investigation is available in the following reports:

- Environmental Consulting Services, Inc. 2005. *Draft Remedial Investigation Report, Capital Industries Site, Seattle, Washington*. Prepared for Capital Industries, Inc. June.
- Environmental Data Resources. 2004. Capital Industries, 5801 Third Avenue South, Seattle, Washington. Inquiry Number 01249156r. August 12.
- Environmental Quality Management. 2000. *Users Guide for the Johnson & Ettinger Model for Subsurface Vapor Intrusion into Buildings*. (Revised.) December.
- Floyd Snider McCarthy, Inc.. 2004. *Capital Industries, Inc. Soil Vapor and Construction Monitoring Report*. Prepared for Capital Industries, Inc. July 6.
- Philip Services Corporation. 2003. *Final Comprehensive Remedial Investigation Report*. November.
- Farallon Consulting L.L.C. 2008. Draft Remedial Investigation Work Plan, Capital Industries, 5801 3<sup>rd</sup> Avenue South, Seattle, Washington. February 28.

### 2.1 CAPITAL PROPERTY DESCRIPTION

The Capital Property is defined as the property owned by Capital that is located at 5803 3rd Avenue South in Seattle, Washington (Figure 1). The Capital Property is located south of Mead Street, north of South Fidalgo Street, west of the properties occupied by commercial buildings adjacent to Capital Plant 4, and east of 1st Avenue South, and includes the property located at the northwest corner of 4th Avenue South and South Mead Street in Section 39, Township 24 South, Range 4 East in Seattle, King County, Washington (Figure 2). The Capital Property consists of King County Assessor Parcel Nos. 1722802255 (5801 3rd Avenue South), 1722801620 (5801 3rd Avenue South), 1722802245 (5820 1st Avenue South), and 1722801530 (5801 3rd Avenue South). The four parcels total 182,468 square feet. Parcel Nos. 1722802255, 1722801620, and 1722802245 are developed with five adjoining tilt-up, slab-on-grade buildings designated as Plant 1 through Plant 5. Parcel No. 1722801530 is located north of Plant 4. The parcel is used by Capital for storage of finished products, which include containers and dumpsters.

Capital is a metal fabricator and manufacturer specializing in production of transportation, solid waste, marine, energy, construction, and aerospace tooling. Capital also produces containers, dumpsters, roll-offs, bins, and other metal products. Processes used to produce manufactured products include forming, laser/plasma cutting, hydraulic punching, and various types of



welding. Assembly of Capital products occurs on the Capital Property and products are stored until shipped.

## **2.2 SURROUNDING PROPERTIES**

The Capital Area of Investigation is located in a mixed-use, light industrial and commercial area of south Seattle. Single family residences are also located in the area. The Capital Area of Investigation is bordered by South Mead Street on the north, 1<sup>st</sup> Avenue South on the west, 4<sup>th</sup> Avenue South on the east, and South Front Street on the south.

## **2.3 CONSTITUENTS AND MEDIA OF CONCERN**

Based on findings presented from previous investigations conducted at the Capital Property, soil and groundwater are the media of concern for the Remedial Investigation. The COPCs include:

- Tetrachloroethene;
- Trichloroethene;
- cis-1,2-Dichloroethene (cis-1,2-DCE);
- trans-1,2-Dichloroethene (trans-1,2-DCE);
- Vinyl chloride;
- 1,4-dioxane;
- Iron; and
- Manganese.

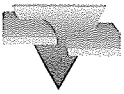
The media of concern identified at the Capital Area of Investigation include soil and groundwater potentially to approximately 70 feet below ground surface (bgs), described as the Water Table Zone, Shallow Zone, and Intermediate Zone.

## **2.4 PROPOSED REMEDIAL INVESTIGATION FIELD PROGRAM**

The proposed Remedial Investigation Field Program for the Capital Area of Investigation will be conducted in two phases. The first phase of the Remedial Investigation Field Program includes historical research, site access, and reconnaissance groundwater sampling. The second phase of the Remedial Investigation Field Program includes monitoring well installation and sampling, natural attenuation evaluation, aquifer testing, and fate and transport modeling. A brief description of each phase of work is presented below.

### **2.4.1 First Phase of the RI Field Program**

The first phase of the RI Field Program focuses on the nature and extent of HVOCs in groundwater in the Water Table Zone, Shallow Zone, and Intermediate Zone immediately up- and down-gradient of the Capital Property. The second phase of the RI Field Program includes installation and monitoring of groundwater monitoring wells to focus on the nature and extent of HVOCs, and will include analysis for other COPCs identified for the Capital Area of Investigation. The results of the first phase of the RI Field Program will be evaluated and



discussed with Ecology to define the location, depth, and construction details of the monitoring wells and to define a Groundwater Monitoring Plan. The scope of work for the second phase of the RI Field Program will be provided in Groundwater Monitoring Plan.

The first phase of the RI Field Program includes conducting a detailed review and research of the past and current operations at properties located within the Capital Area of Investigation. The research will be conducted to identify past or current operations having the potential for a release of HVOCS to the environment. The results of the research will be used to modify proposed reconnaissance groundwater sampling locations and monitoring well locations.

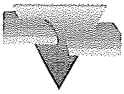
Reconnaissance borings using direct-push drilling methods will be located to collect reconnaissance groundwater and soil samples for laboratory analysis. Reconnaissance groundwater sampling will be conducted in two tiers. Tier 1 reconnaissance groundwater sampling will include collection and analysis of reconnaissance groundwater samples from boring located immediately up- and down-gradient of Capital Plants 2 and 4. Tier 2 reconnaissance groundwater sampling will be based on the analytical results of Tier 1 reconnaissance groundwater samples and will focus on characterizing the lateral and vertical extent of HVOCS not fully defined by the Tier 1 reconnaissance sampling.

Tier 1 reconnaissance groundwater sampling includes collection of reconnaissance groundwater samples from direct-push borings for HVOCS analysis immediately down-gradient of Capital Plants 2 and 4 and up-gradient of Plant 4. The analytical results of groundwater samples collected by Pacific Groundwater Group (PGG) from the proposed and existing Blaser Die Casting monitoring wells located north of Plant 2 will be used to characterize the lateral and vertical extent of HVOCS above screening levels in groundwater up-gradient of Plant 2, if installed and sampled prior to Tier 1 reconnaissance groundwater sampling. Reconnaissance soil samples will be collected for HVOC analysis at select reconnaissance borings proximate to Plant 4 to characterize the lateral and vertical extent of HVOCS in soil above screening levels that may have been released from Plant 4.

Tier 2 reconnaissance groundwater sampling will include collecting reconnaissance groundwater samples from direct-push boring locations selected based on the analytical results of Tier 1 reconnaissance sampling. Tier 2 reconnaissance groundwater sampling will be performed if additional reconnaissance groundwater sample locations are necessary to characterize the down-gradient lateral and vertical extent of HVOCS in groundwater above screening levels. The analytical results of the Tier 1 reconnaissance groundwater sampling may indicate that some or all of the proposed Tier 2 sampling locations are not required to characterize the vertical and lateral extent of HVOCS released from the Capital Property. Proposed Tier 1 and Tier 2 direct-push boring locations are depicted on Figure 19 of the Capital Remedial Investigation Work Plan.

#### **2.4.2 Second Phase of the RI Field Program**

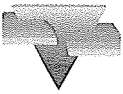
The second phase of the RI Field Program will include installation of pairs or clusters of monitoring wells into the Water Table Zone, Shallow Zone, and, if necessary, Intermediate Zone. The locations of the monitoring wells will be based on the analytical results of Tier 1 and Tier 2



reconnaissance groundwater sampling. The monitoring wells will be monitored to assess the depth to groundwater, aquifer characteristics, concentrations of COPCs, and natural attenuation parameters.

Computer modeling may be used to evaluate fate and transport to assist the evaluation of the risk to human health and the environment, or for support of the evaluation of cleanup actions. The computer modeling results will be used to assess the fate and transport of HVOCs in groundwater, potential impacts to indoor ambient air at buildings located within the Capital Area of Investigation, and the potential for groundwater containing HVOCs at the Capital Area of Investigation to discharge to surface water. The EPA BIOCHLOR model will be used by Capital to achieve the goals of the computer modeling stated above. The results of both phases of the RI Field Program will be used to develop a Conceptual Site Model to support the evaluation and selection of a technically feasible cleanup action.





### **3.0 PUBLIC PARTICIPATION ACTIVITIES AND RESPONSIBILITIES**

The public is invited to participate in the proposed Remedial Investigation process for the Capital Area of Investigation, as established in MTCA. This section describes the means by which the public may be involved in the process. The points of contact for the proposed Remedial Investigation are identified and the various public participation activities and responsibilities are described in the following sections.

#### **3.1 POINTS OF CONTACT**

The representatives for the parties involved in the proposed Remedial Investigation and their contact information is provided below.

The Remedial Investigation is being conducted by Capital, which is represented by:

Mr. Ron Taylor  
Capital Industries, Inc.  
5801 3<sup>rd</sup> Avenue South  
Seattle, Washington 98108  
Telephone: (206) 762-8585  
e-mail: [rtaylor@capitalind.com](mailto:rtaylor@capitalind.com)

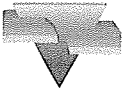
Mr. Donald J. Verfurth  
Gordon & Rees L.L.P.  
701 5<sup>th</sup> Avenue, Suite 2130  
Seattle, Washington 98104  
Telephone: (206) 695-5100  
e-mail: [dverfurth@gordonrees.com](mailto:dverfurth@gordonrees.com)

The environmental consultant for Capital is:

Mr. Peter Jewett  
Farallon Consulting, L.L.C.  
975 5<sup>th</sup> Avenue Northwest  
Issaquah, Washington 98027  
Telephone: (425) 295-0800  
email: [pjewett@farallonconsulting.com](mailto:pjewett@farallonconsulting.com)

The Remedial Investigation is being conducted under an Agreed Order with Ecology. The Ecology representative for this project is:

Mr. Edward Jones, Project Manager  
Ecology Northwest Regional Office  
3190 160<sup>th</sup> Avenue Southeast  
Bellevue, Washington 98008  
Telephone: (425) 649-7000  
e-mail: [ejon461@ecy.wa.gov](mailto:ejon461@ecy.wa.gov)



## **3.2 REQUIRED PUBLIC PARTICIPATION ACTIVITIES**

The public participation activities required by MTCA are to be coordinated by Capital and/or Ecology. This section addresses how Capital and Ecology will share information and receive public comments and community input on the Site activities.

### **3.2.1 Public Involvement Activities**

Capital and Ecology will use a variety of activities to facilitate public participation in the investigation and cleanup of the Capital Site. Capital and Ecology will implement input provided by the community where possible.

Ecology held a public comment period for the Agreed Order. No further formal public comment periods or public meetings are planned under the Remedial Investigation. Following are public involvement activities that may be used:

- Information Repositories (maintained by Ecology at its location; at the project website by Capital and Farallon Consulting, L.L.C. [Farallon]; and Farallon at the Farallon offices);
- Site Register (Ecology);
- Mailing List (Maintained by Ecology with support by Capital); and
- Fact Sheets (Ecology).

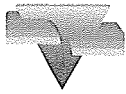
The purposes, time frames, and use of these public involvement activities are presented below.

### **3.2.2 Information Repositories**

An Information Repository (Repository) will be established for documents pertaining to the proposed Remedial Investigation activities at the Capital Area of Investigation to allow citizen access to pertinent information. The documents to be located at the Repository include validated laboratory results, status reports, interim reports, fact sheets, newsletters, and other material considered relevant or on which public comment is requested. The Repository for the Capital Area of Investigation is a website that is currently under construction. The website will be available October 15, 2008 at <http://www.farallonconsulting.com>. Additional repositories that can be accessed by appointment include:

Farallon Consulting L.L.C.  
975 5<sup>th</sup> Avenue Northwest  
Issaquah, Washington 98027  
(425) 295-0800

Ecology Northwest Regional Office  
3190 160<sup>th</sup> Avenue Southeast  
Bellevue, Washington 98008  
(425) 649-7000



### 3.2.3 Site Register

The Ecology Toxics Cleanup Program uses its bimonthly *Site Register* to announce public meetings, comment periods, and other activities. To receive the *Site Register* in electronic or hard copy format, contact Linda Thompson at (360) 407-6069 or by e-mail at [Ltho416@ecy.wa.gov](mailto:Ltho416@ecy.wa.gov). It is also available on the Ecology website at <http://www.ecy.wa.gov> and the most recent issue is located under Site Register 2008.

### 3.2.4 Mailing List

Ecology has compiled a mailing list for the site that includes nearby residences and businesses. The list will be maintained at the Ecology Northwest Regional Office and will be updated as needed. Please contact Ed Jones at (425) 649-4449 or by e-mail at [ejon461@ecy.wa.gov](mailto:ejon461@ecy.wa.gov) for participation in, additions to, or deletions from this mailing list.

### 3.2.5 Fact Sheets

Ecology will mail fact sheets periodically to persons and organizations interested in the Capital project that will contain information regarding public meetings, comment opportunities, and important site activities. Ecology also may mail fact sheets about the progress of site activities.

### 3.2.6 Additional Activities

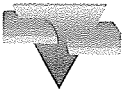
As part of providing public notice of formal public comment periods, the following activities may be undertaken by either Ecology or Capital:

- **Media releases** may be issued to the local newspapers and to radio and television stations; and
- **Public notices** may be posted at the information repository and/or other public buildings.

These activities are to be coordinated with the required public notice activities.

## 3.3 RESPONSIVENESS SUMMARY

Comments received during the public comment periods will be retained in the files established for the Capital project at the Ecology Northwest Regional Office, with copies provided to Capital. Responses to comments received during the public comment period may be addressed and compiled in a Responsiveness Summary prepared by Ecology. The Responsiveness Summary will be sent to those who submit written comments and to the information repository. Notice of the availability of the Responsiveness Summary will be printed in the *Site Register* on the Ecology website.



### **3.4 AMENDMENTS TO PUBLIC PARTICIPATION PLAN**

The Public Participation Plan may be amended as the project proceeds. If an amendment is necessary, the public will be notified by providing the draft amended plan on the website, and/or in mailings, and/or announced in public meetings that may be scheduled. An amended Public Participation Plan will undergo the following process:

- Capital will develop the amended Public Participation Plan;
- Capital will submit the draft amended Public Participation Plan to Ecology and place the amended plan on the project website referenced above;
- Ecology will review the draft amended Public Participation Plan and provide comments or approve the update; and
- Capital will revise the amended Public Participation Plan per Ecology comments and submit it to Ecology. The approved plan will be posted on the project website.

### **3.5 COORDINATION OF PUBLIC PARTICIPATION PLAN REQUIREMENTS**

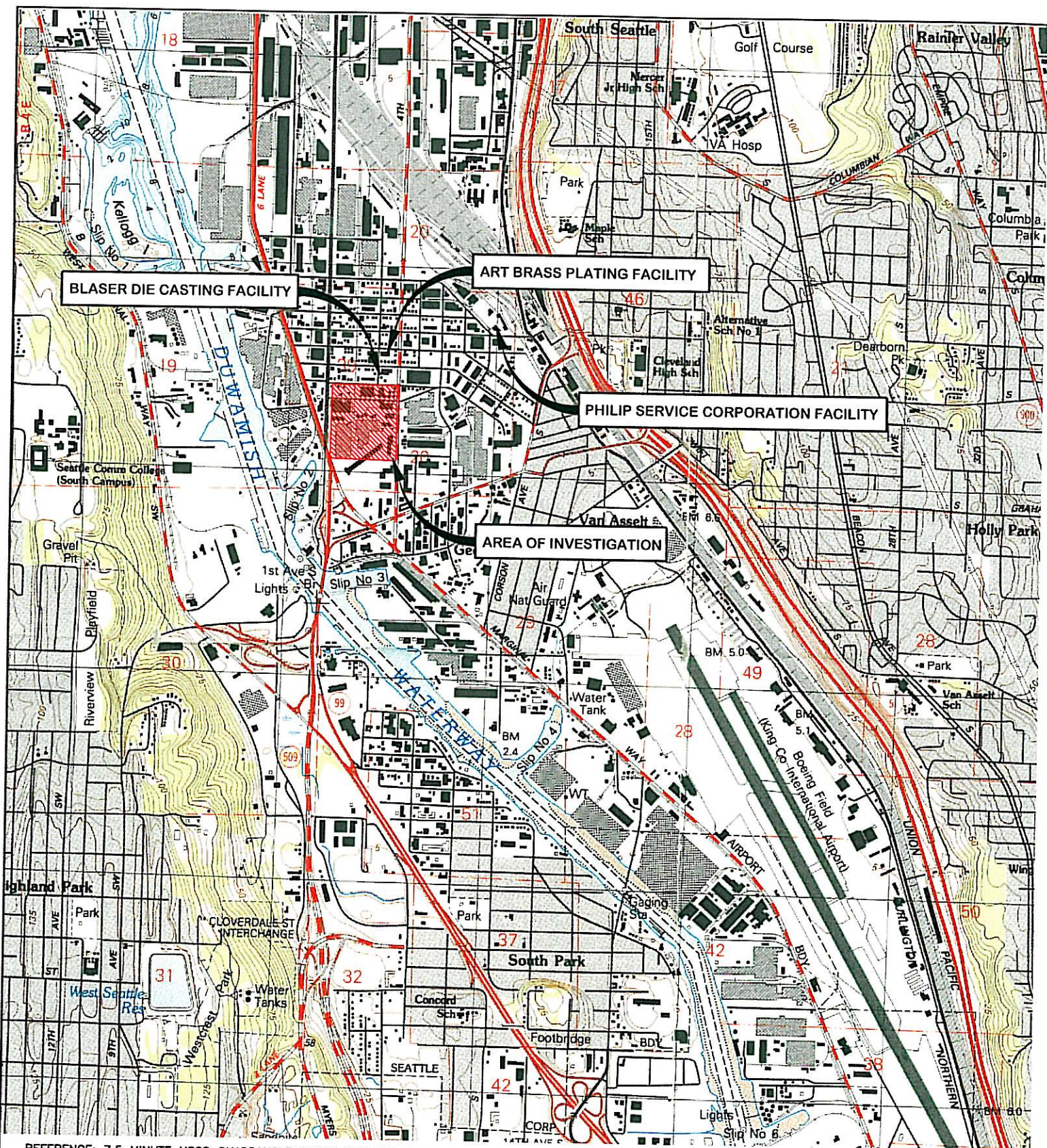
Capital and Ecology will collaborate to provide public notice, develop mailing lists, coordinate public meetings, and establish the Information Repository. However, it is not likely that additional public participation requirements will be necessary. If additional public participation requirements arise under other applicable laws, public participation will be coordinated to the extent feasible.

## **FIGURES**

**PUBLIC PARTICIPATION PLAN**  
Capital Industries, Inc.  
5801 Third Avenue South  
Seattle, Washington

Farallon PN: 457-004





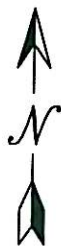
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0 500

APPROXIMATE SCALE IN METERS



WASHINGTON



FARALLON CONSULTING  
975 5th Avenue Northwest  
Issaquah, WA 98027

## FIGURE 1

CAPITAL AREA OF INVESTIGATION  
LOCATION MAP  
PUBLIC PARTICIPATION PLAN  
CAPITAL INDUSTRIES, INC.  
SEATTLE, WASHINGTON

FARALLON PN: 457-004

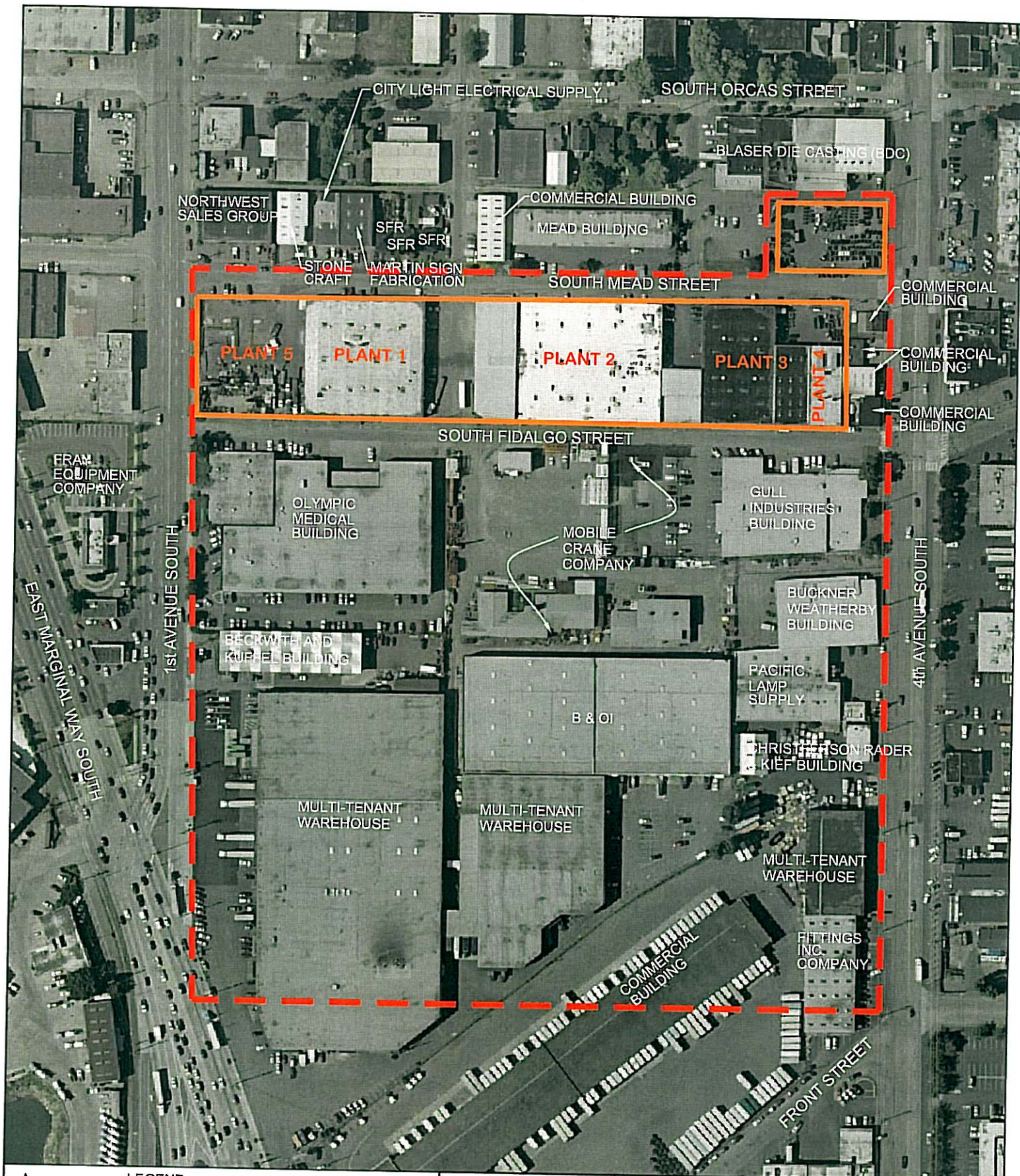
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Checked By: DC

Date: 9/8/08

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# LEGEND

- CAPITAL AREA OF INVESTIGATION
- CAPITAL PROPERTY
- SFR SINGLE FAMILY RESIDENCE

0 200  
APPROXIMATE SCALE IN FEET



FARALLON CONSULTING  
975 5th Avenue Northwest  
Issaquah, WA 98027

## FIGURE 2

CAPITAL AREAS OF INVESTIGATION  
PUBLIC PARTICIPATION PLAN  
CAPITAL INDUSTRIES, INC.  
SEATTLE, WASHINGTON

FARALLON PN: 457-004

Drawn By: DEW

Checked By: DC

Date: 9/8/08

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