



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

*PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300  
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June 24, 2021

Kevin Bagwell, Planning Technician  
City of Port Angeles  
Community and Economic Development  
PO Box 1150  
Port Angeles, WA 98362

Dear Kevin Bagwell:

Thank you for the opportunity to comment on the optional determination of nonsignificance/notice of application for the Northwest Kidney Centers Chase Street Project (PZ 21-33) located at 707 South Chase Street as proposed by Northwest Kidney Centers. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

**HAZARDOUS WASTE & TOXICS REDUCTION: Tara Davis (360) 407-6275**

Demolition

The applicant proposes to demolish an existing structure(s). In addition to any required asbestos abatement procedures, the applicant should ensure that any other potentially dangerous or hazardous materials present, such as PCB-containing lamp ballasts, fluorescent lamps, and wall thermostats containing mercury, are removed prior to demolition. Also, be aware that PCBs are increasingly being found in caulking and paint. It is important that these materials and wastes are removed and appropriately managed prior to demolition. It is equally important that demolition debris is also safely managed, especially if it contains painted wood or concrete, treated wood, or other possibly dangerous materials.

Please review the "Dangerous Waste Rules for Demolition, Construction, and Renovation Wastes," on Ecology's website at: <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Dangerous-waste-guidance/Common-dangerous-waste/Construction-and-demolition>. The applicant may also contact Robert Rieck with Ecology's Hazardous Waste and Toxics Reduction program (HWTR) at (360) 407-6751 for more information about safely handling dangerous wastes and demolition debris

New construction

Construction waste is usually left over from construction work sites. New construction creates dangerous waste from treated wood, paint, solvents, glue, roofing tars, and other materials. These must be designated and disposed of properly under the Dangerous Waste Regulations. Choose less hazardous materials and find safer alternatives, when possible.

**SOLID WASTE MANAGEMENT: Derek Rockett (360) 407-6287**

The applicant proposes to demolish an existing structure(s). In addition to any required asbestos abatement procedures, the applicant should ensure that any other potentially dangerous or hazardous materials present are removed prior to demolition. It is important that these materials and wastes are removed and appropriately managed prior to demolition. It is equally important that demolition debris is also safely managed, especially if it contains painted wood or concrete, treated wood, or other possibly dangerous materials. Please review the "Dangerous Waste Rules for Demolition, Construction, and Renovation Wastes," on Ecology's website at: Construction & Demolition Guidance. All removed debris resulting from this project must be disposed of at an approved site. All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. Contact the local jurisdictional health department for proper management of these materials.

**TOXICS CLEANUP PROGRAM: Nicholas Acklam, Unit Supervisor  
(360) 407-6347 | [nicholas.acklam@ecv.wa.gov](mailto:nicholas.acklam@ecv.wa.gov)**

The proposed project is located at a toxic cleanup site where hazardous substances have been released to the environment. The cleanup of this toxic cleanup site is regulated under the Washington Model Toxics Control Act (MTCA), Chapter 70.105D RCW, and implementing regulations contained in Chapter 173-340 WAC. The site has been designated by Ecology as Cleanup Site ID 249; Facility Site ID 5690762.

As currently known to Ecology, hazardous substances (Petroleum, Volatile Organic Compounds, and Lead) at this site were detected in soil or groundwater. The nature and extent of hazardous substances released to the environment has not yet been adequately determined (WAC 173-340-350). A cleanup action has not yet been selected (WAC 173-340-360) or implemented (WAC 173-340-400). Cleanup standards have not yet been determined (WAC 173-340-700). The November 2015 Whitman Environmental Sciences report referenced within this SEPA does not appear to have been provided to Ecology and environmental data has not been uploaded to Ecology's Electronic Information Management database (EIM). See Policy 840 for electronic data requirements. - <https://apps.ecology.wa.gov/publications/documents/1609050.pdf>

Ecology's Recommendation: Toxic Cleanup Site number 249 currently presents an unknown level of human health risk to workers at the proposed project, for all visitors to the Property, and to the environment. Ecology recommends that pollution in the environment be cleaned up in compliance with WAC 173-340. For this independent cleanup conducted under WAC

173-340-515, the cleanup would be complete when a no further action opinion letter is issued for toxic cleanup site under WAC 173-340-515(5)(b).

**WATER QUALITY/WATERSHED RESOURCES UNIT:**  
**Jessica Eakens (360) 407-0246**

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Construction Stormwater General Permit:

The following construction activities require coverage under the Construction Stormwater General Permit:

1. Clearing, grading and/or excavation that results in the disturbance of one or more acres **and** discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more **and** discharge stormwater to surface waters of the State.
  - a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, **and** discharge to surface waters of the State; and
3. Any size construction activity discharging stormwater to waters of the State that Ecology:
  - a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
  - b) Reasonably expects to cause a violation of any water quality standard.

If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted. For additional information on contaminated construction sites, please contact Carol Serdar at [Carol.Serdar@ecy.wa.gov](mailto:Carol.Serdar@ecy.wa.gov), or by phone at (360) 742-9751.

Additionally, sites that discharge to segments of waterbodies listed as impaired by the State of Washington under Section 303(d) of the Clean Water Act for turbidity, fine sediment, high

Kevin Bagwell

June 24, 2021

Page 4

pH, or phosphorous, or to waterbodies covered by a TMDL may need to meet additional sampling and record keeping requirements. See condition S8 of the Construction Stormwater General Permit for a description of these requirements. To see if your site discharges to a TMDL or 303(d)-listed waterbody, use Ecology's Water Quality Atlas at:

<https://fortress.wa.gov/ecy/waterqualityatlas/StartPage.aspx>.

The applicant may apply online or obtain an application from Ecology's website at:

[http://www.ecy.wa.gov/programs/wq/stormwater/construction/- Application](http://www.ecy.wa.gov/programs/wq/stormwater/construction/-Application). Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology  
Southwest Regional Office

(GMP:202102996)

cc: Tara Davis, HWTR  
Derek Rockett, SWM  
Nicholas Acklam, TCP  
Jessica Eakens, WQ  
Austin Ross, Northwest Kidney Centers (Proponent)