

## **SEPA ENVIRONMENTAL CHECKLIST**

### ***A. Background***

**1. Name of proposed project, if applicable**

Smith-Kem Site – Cleanup Action

**2. Name of applicants:**

Smith-Kem Ellensburg, Inc. and Equilon Enterprises LLC dba Shell Oil Products US (“Shell”)

**3. Address and phone number of applicant and contact person:**

**Smith Kem Ellensburg, Inc.**

200 South Railroad Avenue, Ellensburg, WA 98926

**Shell Oil Products US**

20945 S. Wilmington Ave., Carson, CA 90810

**Authorized Contact Person:**

Erin Murray of Floyd|Snider  
Address: 601 Union Street, Ste. 600, Seattle, WA 98101  
Email: [erin.murray@floydsnider.com](mailto:erin.murray@floydsnider.com)  
Phone: 206-292-2078

**4. Date checklist prepared:**

April 19, 2022

**5. Agency requesting checklist:**

Washington State Department of Ecology (Ecology)

**6. Proposed timing or schedule (including phasing, if applicable):**

Construction for the Smith-Kem Ellensburg Inc. (Smith Kem) Site (Site) – Cleanup Action (project) is anticipated to begin in mid-2023 with a total construction duration of up to 4 months. Semiannual groundwater monitoring would occur for approximately 10 years after project construction is complete.

**7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

The project is proposed to implement a cleanup action consistent with the Site Remedial Investigation and Feasibility Study and a final Cleanup Action Plan (CAP) to be issued by Ecology for the Site after public review and comment. The project is limited to implementation of remediation and associated compliance monitoring activities during cleanup action implementation, post-cleanup action long-term monitoring, and routine inspection and maintenance of remedial elements. Future redevelopment activities may occur at the Site; however, the scope/scale of any future work is currently unknown and would be considered a separate project action requiring its own State Environmental Policy Act (SEPA) review. The proposed project is not dependent upon any future redevelopment and would proceed regardless of possible future Site activities.

**8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

The following environmental information has been or will be prepared specifically for the proposed project:

- *Smith-Kem Site, Remedial Investigation Work Plan*, Floyd|Snider, 2016
- *Smith-Kem Site, Remedial Investigation/Feasibility Study*, Floyd|Snider, 2021
- *Smith-Kem Site, Draft Cleanup Action Plan*, Ecology, April 2021
- *Smith-Kem Site, Pre-Design Work Plan*, Floyd|Snider, *to be prepared*
- *Smith-Kem Site, Engineering Design Report*, Floyd|Snider, *to be prepared*

**9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

The City of Ellensburg is planning a road sewer extension along the western portion of the Smith Kem property, along Railroad Avenue, which could impact site soil and groundwater and compliance monitoring wells at the southeastern corner of the property. Work is scheduled to begin in the summer of 2022. Smith Kem will coordinate with the City of Ellensburg, as needed, to avoid conflicts between projects. See below for project information:

**SEPA #: 202106134**

**Proposal Name: Anderson Road Sewer Extension Project**

File #: P21-133

**10. List any government approvals or permits that will be needed for your proposal, if known.**

The proposed cleanup action is anticipated to be conducted subject to the requirements of an Ecology Consent Decree. Because the cleanup action would be performed under a Consent Decree, it is exempt from the procedural requirements of certain laws and all local permits (WAC 173-340-710(9)(b)) but must comply with the substantive requirements of these laws and permits. The exemption from procedural requirements includes the following:

- Washington Clean Air Act (Chapter 70.94 RCW)
- Solid Waste Management Act (Chapter 70.95 RCW)
- Hazardous Waste Management Act (Chapter 70.105 RCW)

- Water Pollution Control Act (Chapter 90.48 RCW)
- Minimum Standards for Construction and Maintenance of Wells (Chapter 173-160 WAC, Chapter 18.104 RCW)
- Underground Injection Control Program (Chapter 173-218 WAC, Chapters 90.48 RCW)
- City of Ellensburg Site Development Permit
- Construction Stormwater General Permit (CSWGP)
- Any laws requiring or authorizing local government permits or approvals

**11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)**

The proposal associated with this SEPA Environmental Checklist is for performing a cleanup action for the Smith-Kem Site (Site) located at 200 S. Railroad Avenue in Ellensburg, Washington (see Figure 1—Vicinity Map). In this document, the term Site refers to the project area as defined in the draft CAP and by the Model Toxics Control Act (WAC 173-340-200), and specifically where active remediation would be required. In this checklist the term property refers to Parcel Number 226833 in Kittitas County. The term project area includes the property and, potentially, a small portion of the commercial property to the south.

Historical operations and uses at the property resulted in environmental releases of total petroleum hydrocarbons (TPH), lead, pesticides, chlorinated herbicides, nitrate, ammonia, and dioxins/furans in soil and/or groundwater. Work on neighboring properties is not anticipated, but additional actions could be required based on the results of pre-design data collection.

The cleanup action is being conducted to remediate the contaminated soil and groundwater at the Site to the maximum extent practicable to meet the cleanup standards established for the Site. Due to the variability in the character, extent, and media affected by the identified contamination, the cleanup action has been broken into six areas of concern (AOC) to be addressed by multiple remediation technologies.

The components of the cleanup action are described as follows with locations and extents illustrated in Figure 2—Site Plan.

**Soil Excavation with Off-Site Disposal**

Contaminated soil will be removed from all AOCs and an area around boring location FS-01 using standard excavation means and methods. The excavation limits may change based on pre-design data but are not expected to result in excavation quantities that exceed those described below. Excavated soil will be transported to a Subtitle C landfill or to a permitted Subtitle D landfill for disposal. Proper disposal will be based on evaluation of further data. Excavated areas will be backfilled with clean imported fill and restored with a gravel surface.

Monitoring wells within excavation and/or shoring areas may be decommissioned in accordance with Chapter 18.104 RCW (Figure 2) throughout the Site.

- **AOC 1:** Soil would be excavated in three zones to remove pesticides, TPH, and dioxins/furans. The western zone would be excavated to approximately 5 feet below ground surface (bgs), the center zone would be excavated to approximately 8 feet bgs,

and the eastern zone would be excavated to approximately 4 feet bgs. Dewatering and shoring or lay back of side slopes may be necessary to complete the excavation. The total estimated volume of soil removal from AOC 1 is up to 940 cubic yards (CY).

- **AOC 2:** Soil from this area would be excavated from two zones to remove pesticides. A small footprint in the southern portion of AOC 2 would be excavated to approximately 6 feet bgs, and the remaining area would be excavated to approximately 4 feet bgs. Up to 590 CY of soil would be removed in total.
- **AOC 3:** Soil would be excavated to remove pesticides and dioxins/furans to a depth of approximately 2 feet bgs. The total estimated volume of soil removal from AOC 3 is up to 240 CY.
- **AOC 4:** Excavation in AOC 4 would remove soil with pesticides, TPH, and lead to a depth of approximately 5 feet bgs corresponding to a total estimated volume of up to 950 CY of soil removed.
- **AOC 5:** Excavation in AOC 5 would remove TPH and pesticides to a depth of approximately 5 feet bgs. The total estimated volume of soil removal from AOC 5 is up to 65 CY.
- **AOC 6:** Surface pesticides would be removed from AOC 6 to a depth of approximately 2.5 feet bgs. The total estimated volume of soil removal from AOC 6 is up to 55 CY.
- **FS-01:** Up to 10 CY of surface soil would be excavated around the boring location FS-01 to remove TPH.

### **Geosynthetic Clay Liner**

A geosynthetic clay liner (GCL) would be installed in portions of and around AOC 1 and AOC 2 (up to 15,650 square feet [SF]) to provide additional protection of groundwater in this area with the greatest concentrations of chemicals of concern in groundwater. Up to 550 CY of soil would be removed in addition to the quantities described above. The intent of the GCL is to minimize infiltration into groundwater, which would control plume migration and provide an added protection of source control in areas with high traffic and/or ongoing bulk fertilizer operations. The GCL would be extended beyond the area of known contamination as an added protective measure. The surface layer would be excavated in areas where the GCL would be placed outside excavation footprints to an approximate depth of 1.5 feet bgs. The GCL would be installed with multiple layers of gravel and geosynthetic material to provide structure and security against accidental breaches.

Prior to installing the GCL, a 4-inch layer of sand (totaling up to 200 CY) would be placed and compacted to provide a level base. The GCL would be installed over the sand. The GCL would be covered with 4 inches of crushed surfacing base course (CSBC), a 10-ounce high-visibility (orange-colored) geosynthetic fabric, and a second 4-inch layer of CSBC to provide structural integrity to the GCL. A 6-ounce high-visibility indicator layer would be placed over the CSBC and is intended as a visual cue to warn operators before more critical underlying fabrics are damaged. The final and top/surface layer would consist of a minimum of 4 inches of CSBC to restore the surface grade elevation. In total, up to 600 CY of CSBC would be placed as part of the GCL construction. Periodic repairs to the gravel surface will be necessary as part of the long-term operations, maintenance, and monitoring. Specific inspection and maintenance requirements would be included in the Soil Management Plan (SMP).

The GCL would be constructed with a gentle slope to direct infiltrated water to a drainage trench installed along the eastern property boundary (for a total of approximately 350 feet of trenching).

The trench depth would extend approximately 1.5 feet bgs. This trench would have a perforated underdrain within the GCL footprint and would be filled with up to 600 CY of gravel to convey surface runoff and shallow subsurface flow from above the GCL. Outside of the GCL footprint, solid conveyance pipes would be installed to prevent exfiltration of collected surface water to other areas of the Site.

Collected infiltrated water would be conveyed to a single collection manhole in the southeastern corner of the facility to provide pretreatment of water by encouraging sedimentation. Following pretreatment, water would infiltrate into a swale that would be created at the existing riprap area in the southeastern corner of the Site. Overflow water may go toward an existing culvert at the adjacent property line.

### **In Situ Groundwater Treatment**

In situ groundwater treatment would be conducted along the downgradient western edge of AOC 5 to address TPH and pesticides in groundwater migrating from beneath the office and storage building. A proprietary mixture of liquid activated carbon, such as PlumeStop, would be injected under low pressure into the subsurface using a direct push drill rig to provide even distribution within the target groundwater treatment zone (which is expected to be 5 to 15 feet bgs). The colloidal matrix would coat soil particles to increase the adsorption of groundwater contaminants and act as a passive treatment zone to immobilize contaminants and passively treat groundwater as it flows downgradient.

### **Groundwater Monitoring**

Monitored natural attenuation (MNA) for groundwater would be required after other cleanup activities are complete. The groundwater monitoring plan (GMP) would describe long-term post-construction groundwater monitoring and adaptive management to ensure the long-term protectiveness of the cleanup action, and the GMP would detail the process for the MNA evaluation. In addition, a monitoring well network would be established as part of the GMP that would include locations for performance monitoring for the components of the cleanup action (e.g., excavation, in situ groundwater treatment, and MNA). Selected monitoring wells located in source areas would be replaced post-cleanup action to evaluate cleanup action performance. Additional wells may be installed for performance and compliance monitoring, as warranted, based on post-cleanup conditions.

### **Institutional Controls**

Institutional controls (ICs), in the form of an environmental covenant, would be required for the Site, and a deed restriction would be needed to restrict future uses of the Site. ICs would prohibit the use of groundwater as drinking water at the Site. ICs will also prohibit the use of groundwater for domestic use, irrigation, or industrial use. ICs would also require implementation of an Ecology-approved SMP specifying soil management procedures for future subsurface work in areas where contamination at concentrations greater than cleanup levels is present. Any activities that would be proposed within these restricted areas would require compliance with the SMP, which would outline health and safety protocols along with soil handling and management procedures and notification requirements.

The SMP would include measures for routine inspection and maintenance of cleanup elements such as the GCL and monitoring wells. These procedures would be applicable to any future development or maintenance that involves ground-disturbing activities. The SMP would also outline

procedures if existing structures, which may overlie potential subsurface contamination at concentrations greater than cleanup levels, are removed in the future. Where an environmental covenant is required, and in consultation with Ad Gro, Ecology would prepare the environmental covenant consistent with WAC 173-340-440 and Chapter 64.70 RCW.

**12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

- Property Address: 200 S. Railroad Avenue, Ellensburg, WA 98926
- Location: NE ¼, SW ¼, Section 2, T 17 N, R 18 E, Willamette Meridian
- Kittitas County Assessor's Parcel Number: 226833
- The assigned Ecology identification numbers for this Site are as follows:
  - Facility Site ID – 12832256
  - Cleanup Site ID – 4257
- Legal Description: Parcel C of that certain survey recorded May 1, 2013, in Book 38 of surveys, page 129 under auditor's file No. 201305010009, records of Kittitas County, Washington: being a portion of the northeast quarter of the southwest quarter of Section 2, Township 17 North, Range 18 East, West Meridian, in the County of Kittitas, State of Washington.
- The entire property is approximately 83,432 SF or approximately 1.9 acres. The property is bounded to the north by vacant properties and to the south by various light-industrial and commercial businesses. To the east is the BNSF Railway Company (BNSF) rail yard and the rail spur that comes onto the eastern portion of the property. To the west of S. Railroad Avenue is a rural residential property.
- See Attachment A: Vicinity Map.

***B. Environmental Elements***

**1. Earth**

**a. General description of the site:**

(circle one): Flat rolling, hilly, steep slopes, mountainous, other \_\_\_\_\_

The project area is relatively flat with an approximate property elevation at 1,500 feet above mean sea level. The general topography of the area slopes slightly toward the south.

**b. What is the steepest slope on the site (approximate percent slope)?**

The property is relatively flat with the steepest slopes generally less than 2%.

- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.**

The soils at the project area consist of Kayak-Weirman complex at the north portion and of Zillah silt loam in the lower portion of the project area. Soils are generally shallow soils consisting of unconsolidated gravel and cobbles with varying amounts of sand and silt. These soils were observed from the surface down to at least 20 feet bgs. Silt content generally increases on the northern half of the project area with layers of dark brown silt and some organic matter in shallow soils (i.e., between 0 and 5 feet bgs), which is consistent with this area being part of a floodway or wetland prior to site development. This silt unit is not continuous across the project area; however, varying amounts of silt in sandy and gravelly soils were observed in the top 5 feet of soils across the project area. All soils are considered to have been deposited as recent alluvium in the floodplain of the Yakima River.

The property is zoned Heavy Industrial and has not historically been used as agricultural land; however, the property has long supported agriculture through fertilizer-blending and pesticide-storage operations. Those operations would continue following project completion.

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.**

There is no known stability issue associated with sloping soil within the project area.

- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.**

Please refer to the response to Question A.11, which provides additional detail on the purpose, location, and approximate extents of the proposed filling, excavation, and grading activities.

In total, the project would require up to 3,400 CY of soil excavation and placement of approximately 3,400 CY of clean fill (as either clean imported select borrow, sand, or gravel); this would affect a total area of approximately 30,000 SF of the Site. All fill material would be procured from local commercial suppliers. The contract specifications would require the contractor to provide test results verifying all import soil is clean.

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.**

Soil erosion may occur during ground-disturbing activities. To minimize potential erosion, the contractor will implement erosion and sediment control best management practices (BMPs) identified in a project-specific Stormwater Pollution Prevention Plan (SWPPP) that will be prepared as a requirement of the CSWGP. The project will be designed to meet Ecology's 2019 Stormwater Management Manual for Eastern Washington.

The completed project would not increase the potential for erosion. All areas subject to ground disturbance would be backfilled and surfaced with gravel or impervious surfaces to prevent erosion; therefore, no long-term erosion impacts are anticipated as a result of implementation of the cleanup action.

**g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?**

The site is almost entirely covered with materials that are considered impervious, including buildings, pavement and packed gravel. The percentage of impervious surface would not change as a result of the project. There are buildings on approximately one-third of the property, and packed gravel across the remaining portion of the property.

**h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:**

The proposed project includes the following erosion/earth impact control measures, which will be implemented during construction:

- A project-specific SWPPP would be developed and its erosion and sediment control BMPs will be implemented by the contractor.
- Areas within the project area subject to deep excavations would be shored if necessary to prevent collapse.

The proposed project would not result in long-term erosion impacts. This would be ensured through placement of gravel surfacing over areas subject to ground disturbance. Gravel surfacing would prevent the migration of soils post-construction. In addition, an SMP will be implemented for the Site.

No other long-term earth impacts are anticipated to occur, and no other impact minimization/mitigation measures are proposed.

**2. Air**

**a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.**

During implementation of the cleanup action, heavy equipment and vehicle traffic may generate incidental particle pollution from dust and emissions that includes nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and PM10 (dust). The release of pollution would be temporary, limited to the duration of construction, and localized within the project area.

Ongoing monitoring of the implemented cleanup action would be a source of incidental emissions. Monitoring would require semiannual vehicle trips to and from the Site for approximately 10 years. The vehicle trips produced by these activities would not result in a significant source of air emissions.

**b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

There are no off-site sources of emissions or odor that would affect the proposed project.

**c. Proposed measures to reduce or control emissions or other impacts to air, if any:**

During construction, TESC measures will be implemented by the contractor to minimize fugitive dust release, which could include spraying the construction area with water during excavation and



soil movement. Contractor staging/laydown will also be located in proximity to the job site and, where possible, vehicles will not be allowed to idle; these measures would reduce vehicle emissions.

To protect workers during construction activities, a photoionization detector will be used to monitor the concentrations of organic vapors in the project area. Protocols will be detailed in a project-specific Health and Safety Plan.

The potential for vapor intrusion from subsurface contaminants that remain post-construction pertains only to uncapped enclosed spaces and structures. The project would retain the office and storage building as a cap to underlying contaminated soil. As a result, there would be no emissions to the air after the project is completed.

### **3. Water**

#### **a. Surface Water:**

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

The nearest bodies of surface water include Mercer Creek, approximately 225 feet to the west of the property, and Wilson Creek, approximately 125 feet east of the property.

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

Work would not occur over or in the identified waters. Work would occur within 200 feet of Wilson Creek, and include excavation of contaminated material; however, BMPs would ensure no impacts to surface waters. Excavated areas would be backfilled and restored with a gravel surface. Please see the project description for more details. A figure depicting project actions is included with this checklist as Attachment B.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

The proposed project activities do not include work below the ordinary high water mark of nearby surface waters. No fill or dredge material will be placed into or removed from surface waters.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.**

The proposed project would not require surface water withdrawals or diversions.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

Yes, the project area is within FEMA's Flood Insurance Rate Map (FIRM) Zone AE, a Special Flood Hazard Area, which is defined as an area having a 1% chance of being inundated by a flood event in any given year. The project would not result in any changes to the floodplain.

**6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

The proposed project would not discharge waste materials to surface waters.

**b. Ground Water:**

**1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.**

Groundwater would not be withdrawn for drinking water, domestic water, irrigation, or industrial uses. Limited withdrawal (dewatering) is anticipated to be required during excavation to prevent groundwater from entering the excavation area. Water removed from the excavation area would either be transported off-site or treated onsite and discharged under the CSWGP. Construction-related groundwater withdrawal quantities are currently unknown.

Ongoing groundwater monitoring (which requires minor groundwater withdrawal) would be conducted following cleanup action implementation. Although the exact amount of groundwater withdrawn from groundwater wells is unknown, the volume of groundwater withdrawn would be negligible. Discharges to groundwater would not occur. Groundwater would not be withdrawn for drinking water use, which is prohibited at the Site.

**2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

The proposed project would not discharge waste material into the ground.

**c. Water runoff (including stormwater):**

**1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

Currently, stormwater from roof runoff and other hard surfaces either flows directly to the ground surface or is directed to roof gutters, eventually infiltrating into the existing gravel surface. In unpaved areas of the property, stormwater infiltrates through the existing gravel surface. On the eastern side of the property a localized depression collects surface runoff from the surrounding area and culminates in a culvert.

As part of the proposed project, collected infiltrated water from a portion of the property (up to 15,650 SF) would be conveyed to a single collection manhole that would be installed in the southeastern corner of the facility to provide pretreatment of water by encouraging sedimentation. Following pretreatment, water would infiltrate into a swale that will be created at the existing riprap area in the southeastern corner of the property. Overflow water may go toward an existing culvert at the adjacent property line.

**2) Could waste materials enter ground or surface waters? If so, generally describe.**

Proper stormwater and erosion-control measures will be installed by the contractor prior to initiation of ground-disturbing activities. See response to question B.3.d for description of measures to be implemented to reduce the potential for materials to discharge to surface waters. Waste materials generated by the completed project are not anticipated to enter groundwater or surface waters.

**3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

As described in response to question B.3.d, the proposed project would affect drainage patterns within the portion of the property covered by the GCL because infiltrated water would be directed towards a drainage trench along the eastern property boundary.

**d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:**

A project-specific TESC Plan will be prepared; the BMPs outlined in this plan will be implemented by the contractor to reduce or control stormwater runoff during construction. The proposed project would not result in long-term runoff impacts that warrant additional control measures.

**4. Plants**

**a. Check the types of vegetation found on the site:**

deciduous tree: alder, maple, aspen, other

evergreen tree: fir, cedar, pine, other

shrubs

grass

pasture

crop or grain

Orchards, vineyards or other permanent crops.

wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other

water plants: water lily, eelgrass, milfoil, other

other types of vegetation

There is very little vegetation on the property or on adjacent properties. The only vegetation present is occasional grass clumps (particularly immediately off-property near the railroad track).

**b. What kind and amount of vegetation will be removed or altered?**

Limited amounts of shrubs and grasses would be removed from the project area; no significant vegetation or trees would be removed.

**c. List threatened and endangered species known to be on or near the site.**

There are no known plant species that are listed as threatened or endangered on or near the project area.

**d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:**

The proposed project does not include a landscaping or vegetation preservation/ enhancement component as there is little vegetation present within the project area. The property is zoned industrial and will continue to function as such following the completion of the project.

**e. List all noxious weeds and invasive species known to be on or near the site.**

No known noxious weeds or invasive species are known to be on or near the project area.

**5. Animals**

**a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include:**

**birds: hawk, heron, eagle, songbirds**

**mammals: deer, coyote, other: Mammals adapted to urban habitats**

**fish: bass, salmon, trout, herring, other \_\_\_\_\_**

The project area is heavily developed, with minimal functional habitat for birds or mammals; birds and mammals that may utilize the project area are likely adapted to industrial environments.

**b. List any threatened and endangered species known to be on or near the site.**

There are no known threatened and/or endangered species present in the vicinity of the project area.

**c. Is the site part of a migration route? If so, explain.**

Yes. The general project area is located within the Pacific Flyway, a broad migratory corridor that extends from Alaska to South America, used by waterfowl, eagles, hawks, falcons, songbirds, and shorebirds.

**d. Proposed measures to preserve or enhance wildlife, if any:**

No potential adverse impacts to animal species are anticipated; moreover, implementation of the proposed project would result in a net benefit to animals and their environs through removal of contaminated material.

**e. List any invasive animal species known to be on or near the site.**

No invasive species are known to be on or near the project area.

**6. Energy and Natural Resources**

**a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

The proposed project consists of remediating contamination on the Site, during the course of which some technological components will require the temporary use of onsite electricity or portable

generators to power associated equipment. No energy or natural resources are required once the cleanup action has been implemented.

**b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

The proposed project does not include construction of vertical elements that could preclude adjacent properties from collecting solar energy.

**c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:**

The proposed project would not result in energy or natural resources impacts; therefore, no energy conservation or control measures are required or proposed.

## **7. Environmental Health**

**a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.**

Yes. The purpose of the proposed project is to implement a cleanup action in order to remediate soil and groundwater contamination to prescribed cleanup levels. In the short term, project construction would require excavation/handling of contaminated material, which would temporarily increase construction personnel's potential for exposure to environmental health hazards. In addition, excavation during project construction would require use of heavy machinery that requires fossil fuels for operation; use of this machinery could result in an increase in spill or fire potential.

Long-term, performance/confirmation monitoring would be used to confirm the long-term effectiveness of the cleanup action after completion of the cleanup action. Performance/confirmation monitoring would include long-term monitoring to assess the effectiveness and permanence of each element of the cleanup action. Monitoring events would require personnel to handle/contact potentially contaminated material/equipment.

Short- and long-term environmental health concerns resulting from the proposed project would be controlled or mitigated to the maximum extent practicable, as discussed in the response to question B.7.a.5.

**1) Describe any known or possible contamination at the site from present or past uses.**

Past industrial operations at the project site have resulted in contaminated soil and groundwater. Chemicals of concern identified within soil and/or groundwater include TPH, lead, pesticides, chlorinated herbicides, nitrate, ammonia, and dioxins/furans.

**2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

The property is currently leased to a tenant that operates an agricultural distribution business. Operations at the property include handling and storage of bulk liquid and dry fertilizer products, as

well as a full range of crop protection products (which include a broad range of pesticides and herbicides), some of which are hazardous.

Other than the hazardous chemicals/conditions present on the Site (such as contaminated soil and groundwater) that will be remediated as part of the cleanup action, there are no known underground hazardous liquid and/or gas transmission pipelines located on the property or in the vicinity.

**3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

Contaminated soil will be excavated and transferred by truck off-site for disposal at a Subtitle C or a Subtitle D Landfill. Contaminated soil that has been excavated will be temporarily stockpiled within the project area until it can be loaded onto trucks for transport.

After implementation of the cleanup action, no toxic or hazardous chemicals are anticipated to be stored, used, or produced as part of the proposed project.

**4) Describe special emergency services that might be required.**

The proposed project would not require special emergency services. The City of Ellensburg Fire Department or medical services will be called if there is an emergency.

**5) Proposed measures to reduce or control environmental health hazards, if any:**

The purpose of the proposed project is to remediate the Site to prescriptive cleanup levels by removing environmental health hazards (such as contamination). During construction, soil would be excavated, managed, and disposed of in a manner approved by Ecology. Removal of contaminated soil to proposed cleanup levels or remediation levels is anticipated to bring groundwater into compliance with proposed cleanup levels within a predicted restoration time frame of 10 years. Implementation of the cleanup action would be conducted by a contractor who will be responsible for implementing BMPs that ensure that contaminated media do not inadvertently migrate off-site via erosion or stormwater.

The existing office and storage building provide a protective cap over areas where contamination remains in the ground to prevent direct contact exposures following implementation of the cleanup action.

The overall cleanup action, including construction and long-term monitoring, will be implemented in accordance with state and federal regulations governing the safety of workers implementing remedies at hazardous waste sites. These consist of the following:

- Health and Safety for Hazardous Waste Operations and Emergency Response, Chapter 296-62 WAC, and Health and Safety, 29 CFR 1901.120
- Occupational Safety and Health Act
- Washington Industrial Safety and Health Act, Chapters 296-62 and 296-155 WAC; Chapter 49.17 RCW

## **b. Noise**

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

The project site is bordered by active transportation corridors – a rail line to the east and South Railroad Avenue to the west. The proposed project would not be affected by existing noise sources.

- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.**

Short-term noise would result from project construction, which would include but not be limited to use of heavy machinery, back-up alarms, and truck/personal vehicle traffic. This noise would be temporary, generally occur during normal working hours, and be consistent with the industrial zoning/nature of the area surrounding the project area.

The proposed project would not produce noise after construction is complete.

- 3) Proposed measures to reduce or control noise impacts, if any:**

Construction equipment would be muffled in accordance with the applicable laws and workers would wear ear protection as appropriate. Construction work would be conducted in conformance with the maximum permissible noise limitations prescribed in Ellensburg City Code 5.60, which limits normal construction between the hours of 6:00 a.m. and 10:00 p.m.

## **8. Land and Shoreline Use**

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

Land uses at the property are industrial or commercial in nature. The majority of the property is used as a fertilizer-blending and pesticide-storage operation. Adjacent properties include a vacant lot to the north, a BNSF rail yard to the east, South Railroad Avenue and a residential property to the west, and a Habitat for Humanity store to the south.

The proposed project may result in short-term, negligible impacts to the adjacent southern property if additional excavation is required as a result of future sampling efforts, but otherwise will not affect current land uses on nearby or adjacent properties.

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

Historical records indicate the property has been used for industrial purposes since at least the 1920s. There would be no conversion of agricultural or forest land resulting from this project.

**1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:**

The proposed project would not affect or be affected by normal business operations of working farms or forest lands because there are no designated agricultural or forest lands in the vicinity of the project site.

**c. Describe any structures on the site.**

There are three buildings on the property—a machine shop, an office and storage building, and a bulk fertilizer building—totaling approximately 28,000 SF. Three aboveground storage tanks are stored within a containment area.

**d. Will any structures be demolished? If so, what?**

No structures would be demolished. The buildings would be retained to cap underlying contaminated soil.

**e. What is the current zoning classification of the site?**

The property is zoned Industrial Heavy.

**f. What is the current comprehensive plan designation of the site?**

The City of Ellensburg's official zoning map (2021) shows the land designated as Industrial Heavy.

**g. If applicable, what is the current shoreline master program designation of the site?**

The property does not have a shoreline master program designation.

**h. Has any part of the site been classified as a critical area by the city or county? If so, specify.**

The description on the Kittitas County assessor's web page shows the land designated as having a critical area: FEMA FIRM map designation as Zone C, 100-year floodplain. FEMA's 2019 preliminary flood hazard data indicate a designation as Zone AE.

**i. Approximately how many people would reside or work in the completed project?**

The completed project would not directly provide housing or result in a change in employment opportunities. Existing business operations would continue following completion of the project.

**j. Approximately how many people would the completed project displace?**

The completed project would not result in displacement of people.

**k. Proposed measures to avoid or reduce displacement impacts, if any:**

The proposed project would not result in displacement impacts; therefore, no displacement avoidance or reduction measures are required or proposed.



**I. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:**

The proposed project is limited to remediation of contaminated media and long-term monitoring of the cleanup action. These project activities would have no long-term adverse effect on existing or projected land uses.

**m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:**

The proposed project would not result in adverse impacts to agricultural or forest lands of long-term commercial significance; therefore, impact reduction or control measures are not required or proposed.

**9. Housing**

**a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.**

The proposed project does not include construction of new housing.

**b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

The proposed project would not eliminate existing housing.

**c. Proposed measures to reduce or control housing impacts, if any:**

No housing impacts would occur; therefore, no impact reduction or control measures are required or proposed.

**10. Aesthetics**

**a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

No vertical structures/buildings are proposed as part of this project.

**b. What views in the immediate vicinity would be altered or obstructed?**

During construction, existing views would be temporarily altered as additional construction vehicles/equipment would be located and used within the project area. However, the project area is industrial in nature; therefore, views would remain consistent with current use.

**c. Proposed measures to reduce or control aesthetic impacts, if any:**

No aesthetic impacts would occur; therefore, impact reduction or control measures are not included in the proposed project.

## **11. Light and Glare**

### **a. What type of light or glare will the proposal produce? What time of day would it mainly occur?**

Project construction would temporarily result in additional personal vehicles and construction machinery/equipment; this could result in a temporary and negligible increase of light/glare during low-light conditions, localized to the project area. In addition, temporary lighting may be utilized if night work is required. The temporary light/glare produced by the project would remain consistent with the overall nature of the industrial area within the project area.

The completed project would not result in an increase of light or glare.

### **b. Could light or glare from the finished project be a safety hazard or interfere with views?**

No. The proposed project would not result in light or glare that could constitute a safety hazard or interfere with views.

### **c. What existing off-site sources of light or glare may affect your proposal?**

No existing sources of light or glare would affect the proposed project.

### **d. Proposed measures to reduce or control light and glare impacts, if any:**

The proposed project would not result in light or glare impacts; therefore, no light or glare reduction/control measures are included with the proposal.

## **12. Recreation**

### **a. What designated and informal recreational opportunities are in the immediate vicinity?**

There are no designated recreational opportunities in the immediate vicinity of the project area.

### **b. Would the proposed project displace any existing recreational uses? If so, describe.**

The proposed project would not displace any recreational uses.

### **c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

The proposed project would not result in recreation impacts; therefore, no recreation impact control or reduction measures are proposed.

## **13. Historic and Cultural Preservation**

### **a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

Currently, there are two structures located on the property that are more than 45 years old, but they are unlikely to meet the historic properties criteria for local, State, and National Register listing. The Washington State Department of Archaeology and Historic Preservation's (DAHP's) database

known as the Washington Information System for Architectural and Archaeological Records Data (WISAARD) was reviewed for historic properties and districts located on or near the project area. There are no buildings, structures, or historic-period cultural resources documented on or near the project area except for the Northern Pacific Railway Passenger Depot – Ellensburg located 750 feet north of the project area. The depot was nominated and determined to be eligible for listing on the National Register of Historic Places in 1991.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

There are no known pre-contact and/or historic-period archaeological resources present on the property. According to DAHP's non-public WISSARD database, there are 25 archaeological sites located within a 1-mile radius of the project area. The nearest archaeological site, located less than 0.25 miles from the project area, is a multi-component debris scatter comprised of late prehistoric projectile points and historic debris associated with former businesses that operated during the early- to mid-1900s.

A recent cultural resources survey and subsurface investigation was completed for a local utility project located less than 0.25 miles from the project area. The survey concluded that no cultural resources were recovered during the survey and/or subsurface investigations, and further site investigation was not recommended.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

A detailed review of DAHP's public and non-public WISAARD databases was completed to evaluate known pre-contact archaeological resources, historic properties, districts, and cemeteries located on and/or in close proximity to the project area. Archaeological site forms, historic property inventories, and cultural resource survey reports were reviewed and are summarized in response to 13.a and 13.b above.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

An Inadvertent Discovery Plan (IDP) will be completed and implemented by the contractor during all ground-disturbing activities. Should any pre-contact and/or historic period artifacts and/or human remains be encountered during excavation, work will halt immediately, procedures in the IDP will be followed, and all appropriate contacts will be notified.

#### **14. Transportation**

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

Access to the project area is provided by South Railroad Avenue. The proposed project would not alter the existing ingress/egress points to this road.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

No. Public transit does not directly serve the project area. The nearest transit stop is located approximately 0.5 miles northwest of the property at 5<sup>th</sup> Avenue and North Pacific Street. Service to this transit stop is provided by Central Transit, Route 15. The nearest state highway is Interstate 90.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?**

The proposed project would not add or eliminate any parking spaces.

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

The proposed project would not require any new facilities or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities.

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

The property is bordered to the east by a BNSF rail corridor. The proposed project will not use water, rail, or air transportation during construction activities or after completion of the project.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

Vehicle traffic would primarily occur during excavation activities over an estimated 2-month period. During these 2 months there would be up to 15 vehicle trips per day on average. Vehicle trips generated by the completed project would be negligible as generated trips would be limited to semiannual monitoring activities post-cleanup action.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

Neither the proposed project nor its construction would interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets.

- h. Proposed measures to reduce or control transportation impacts, if any:**

No measures to reduce or control transportation impacts are anticipated as no adverse impacts on transportation would result from the proposed project.

## **15. Public Services**

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.**

The proposed project would not establish a new land use or increase the intensity of existing land uses. Therefore, the completed project would not increase the demand for public services.

**b. Proposed measures to reduce or control direct impacts on public services, if any.**

No reduction or control measures are proposed as no adverse impacts on public services would result from the proposed project.

**16. Utilities**

**a. Circle utilities currently available at the site:**

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,  
other \_\_\_\_\_

**b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.**

The proposed project is a cleanup action; utilities would be used on a temporary basis for the duration of cleanup work and would be limited to water and electricity. Electricity and water would be provided from existing sources on the property or from contractor-provided equipment.

**C. Signature**

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: \_\_\_\_\_

Name of signee John Mefford

Position and Agency/Organization Ecology Cleanup Project Manager/Department of Ecology

Date Submitted: \_\_\_\_\_

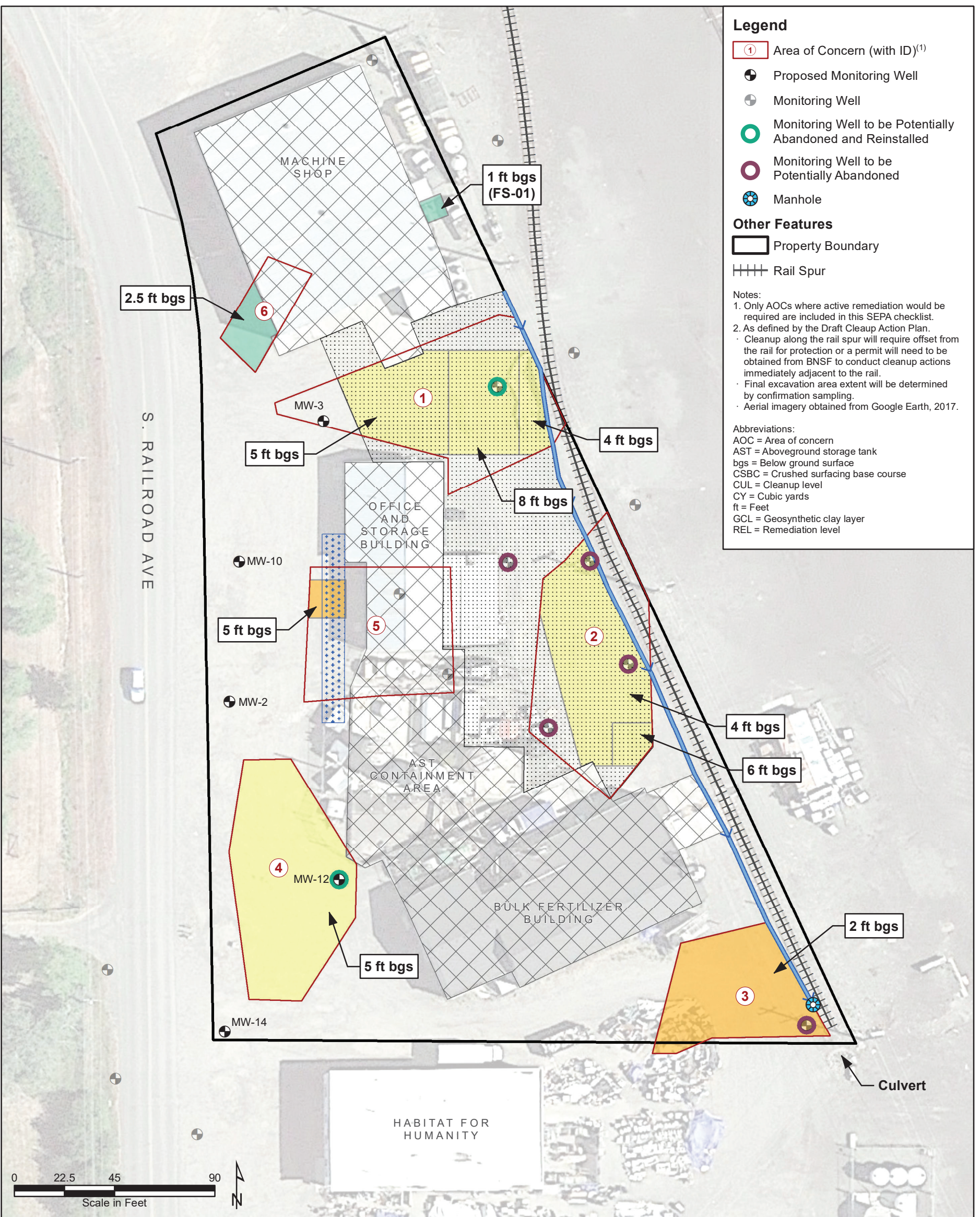


Notes:  
 · Property boundary drawn from CAD Survey by Cruse & Associates, 2013.  
 · Aerial imagery obtained from ESRI, 2016.

**FLOYD | SNIDER**  
 strategy ■ science ■ engineering

**Smith-Kem Site  
 Ellensburg, Washington**

**Figure 1  
 Site Vicinity Map**



**Legend**

- 1 Area of Concern (with ID)<sup>(1)</sup>
- Proposed Monitoring Well
- Monitoring Well
- Monitoring Well to be Potentially Abandoned and Reinstalled
- Monitoring Well to be Potentially Abandoned
- Manhole

**Other Features**

- Property Boundary
- Rail Spur

**Notes:**

1. Only AOCs where active remediation would be required are included in this SEPA checklist.
2. As defined by the Draft Cleanup Action Plan.
  - Cleanup along the rail spur will require offset from the rail for protection or a permit will need to be obtained from BNSF to conduct cleanup actions immediately adjacent to the rail.
  - Final excavation area extent will be determined by confirmation sampling.
  - Aerial imagery obtained from Google Earth, 2017.

**Abbreviations:**

- AOC = Area of concern
- AST = Aboveground storage tank
- bgs = Below ground surface
- CSBC = Crushed surfacing base course
- CUL = Cleanup level
- CY = Cubic yards
- ft = Feet
- GCL = Geosynthetic clay layer
- REL = Remediation level

**Selected Cleanup Action**

<p><span style="display: inline-block; width: 20px; height: 10px; background-color: #90EE90; border: 1px solid black;"></span> <b>Excavate to CULs<sup>(2)</sup></b></p> <p>Excavate and dispose of soil at off-site landfill. Backfill with clean fill and gravel surface.</p> <p>· AOC 6 · FS-01</p>	<p><span style="display: inline-block; width: 20px; height: 10px; background-color: #FFFF00; border: 1px solid black;"></span> <b>Excavate to Leaching RELs<sup>(2)</sup></b></p> <p>Excavate and dispose of soil at off-site landfill. Backfill with clean fill and gravel surface.</p> <p>· AOC 1 · AOC 2 · AOC 4</p>	<p><span style="display: inline-block; width: 20px; height: 10px; background-color: #FFA500; border: 1px solid black;"></span> <b>Excavate to Direct Contact RELs<sup>(2)</sup></b></p> <p>Excavate and dispose of soil at off-site landfill. Backfill with clean fill and gravel surface.</p> <p>· AOC 3 · AOC 5</p> <p><i>Note: If pre-design data show that contamination in AOC 3 extends off-property, then excavation off-property will be designed to meet the CULs.</i></p>
	<p><span style="display: inline-block; width: 20px; height: 10px; border: 1px dashed black;"></span> <b>Protect Existing Structures</b></p> <p>Existing buildings and concrete pavement to remain as cap.</p>	<p><span style="display: inline-block; width: 20px; height: 10px; background-color: #ADD8E6; border: 1px dotted black;"></span> <b>In Situ Groundwater Treatment</b></p> <p>Inject trademarked colloidal activated carbon matrix (PlumeStop™) to create a passive treatment zone.</p>
	<p><span style="display: inline-block; width: 20px; height: 10px; background-color: #D3D3D3; border: 1px dotted black;"></span> <b>Geosynthetic Clay Liner</b></p> <p>Install GCL as barrier for protection of groundwater from residual soil contamination.</p>	

**Drainage System**

Collect infiltrated precipitation drainage from the GCL and convey to a collection manhole at the southeast corner of the property.

**GCL Cross-Section**

*Not to Scale.*

*Note: GCL cross-section provided by PBS Engineering and Environmental Inc.*

I:\GIS\Projects\PKG-SmithKem\MXD\JARPA\Figure 2 Site Plan.mxd  
3/14/2022