STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300

STATE ENVIRONMENTAL POLICY ACT
DETERMINATION OF NONSIGNIFICANCE

Date of Issuance: July 26, 2023

Lead agency: Department of Ecology, Toxics Cleanup Program, Southwest Region

Agency Contact: Cameron Penner-Ash, Cleanup Project Manager, cpen461@ecy.wa.gov, 360-999-9590

Permit Number: Work is to be performed under the authority of a Model Toxics Control Act Consent Decree No. DE 21768

Description of proposal:

The proposed action includes a soil excavation in the groundwater Source Area (including the former Park Laundry property (Property), a City of Ridgefield parcel, and two privately owned [Hinrich] parcels). Additionally, the proposed action includes focused in-situ groundwater remediation, institutional controls, and groundwater monitoring. The project will attempt to reduce concentrations of tetrachloroethene (PCE) and its degradation products (trichloroethylene [TCE], cis-1,2-DCE [Dichloroethane], trans-1,2-DCE, and vinyl chloride) in the soil and groundwater.

The remedial excavation is centered primarily on the Property, but extends North to the adjoining Hinrich parcels, and South to a property owned by the City of Ridgefield. Soil excavation would cover an approximately 1,700 square foot area with an excavation to 15 feet below ground surface (bgs) and a 300 square foot area to 3 feet bgs (approximately 1,000 cubic yards in total). Excavation would be to the top of an underlying clay unit. Contamination does not appear to enter into the clay unit. The excavation would remove soil contamination that is a potential contaminant source to groundwater and decrease the potential for direct exposure contact during any future building construction and subsurface excavation activity.

The focused in-situ groundwater treatment will consist of injection points to treat PCE in groundwater from an average depth of 5 to 15 feet bgs. The treatment area on Property and within the Source Area, would be outside of the excavation extending north onto the Hinrich parcels. The injections will consist of approximately 43,450 pounds of anaerobic EHC®

bioremediation amendment followed by 30 liters of microorganism DHC (*Dehalococcoides sp.*) inoculation to enhance degradation.

If upon completion of the remedial action, PCE and its degradation products remain in the Source Area in soil and/or groundwater above cleanup levels, institutional controls will be required. If that contaminated media is to remain in the Source Area, an Environmental Covenant (EC) will be required for those properties. The purpose of the EC will be to assure both he continued protection of human health and the environment by restricting access to remaining contaminated media while VOCs degrade in response to cleanup actions and monitored natural attenuation. Additionally, the EC will prohibit groundwater use in the Source Area for irrigation, potable drinking water, or any use involving human contact.

A groundwater monitoring plan will be developed as part of the Engineering Design Report. The Site's existing monitoring wells are in a residential upland area of Ridgefield, between North 3rd Avenue, Railroad Avenue, Division Street, and Pioneer Street. The monitoring plan will include 19 wells, 3 of which will be installed prior to the remedial action to evaluate the lower water bearing zone below the Site.

Location of proposal: The work will be employed at 122 North Main Avenue, Ridgefield, WA.

Applicant/Proponent: The City of Ridgefield.

Project Representative:	Steve Stuart, City Manager
Email:	steve.stuart@ci.ridgefield.wa.us
Phone:	360-887-3557
Address:	230 Pioneer Street, Ridgefield, Washington 98642

Ecology has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). We have reviewed the attached Environmental Checklist, as well as the public review draft Cleanup Action Plan.

These documents are available at:

- Ridgefield Public Library, 210 North Main Avenue, WA 98642
- Ecology Lacey Office (by appointment), 300 Desmond Drive SE, Lacey, WA 98503

This determination is based on the following findings and conclusions:

- The project will reduce concentrations of tetrachloroethene (PCE) and its degradation products (trichloroethylene [TCE], cis-1,2-DCE [Dichloroethane], trans-1,2-DCE, and vinyl chloride) in the soil and groundwater.

- Engineering design documents will be prepared and approved by Ecology to ensure all on-site work will be performed in accordance with applicable standards and use of best management construction and erosion control practices.

- Contaminated soils will be managed in accordance with a previously approved (by Ecology) soils testing and disposal plan.

- The injection of treated groundwater and liquid biostimulants will be conducted under the requirements of the Washington Underground Injection Control (UIC) program.

- The Ecology cleanup project manager will provide oversight during project construction.

The comment period for this DNS corresponds with the comment period for the Remedial Investigation/Feasibility Study, Public Review Draft Cleanup Action Plan and associated Agreed Order. The comment period begins on August 10, 2023, and ends on September 11, 2023.

Responsible official:

Rebecca S. Lawson, P.E., LHG
Section Manager
Toxics Cleanup Program
Southwest Region Office
Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7600
360-407-6241

Signature  _____

Date July 26, 2023 _____

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background [HELP]

1. Name of proposed project, if applicable:

Cleanup Action for the Former Park Laundry Project Area

2. Name of applicant:

City of Ridgefield (Steve Stuart, City Administrator)

3. Address: *230 Pioneer Street, PO Box 608, Ridgefield, WA 98642*
   Phone: *(360) 887-3557*

4. Date checklist prepared:

June 2, 2023

5. Agency requesting checklist:

City of Ridgefield

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

The implementation (excavation and injections) is estimated to take several months and is anticipated to start in summer/fall 2023. Long-term groundwater monitoring will be conducted to assess the stability, decrease, or increase of concentrations in groundwater through natural attenuation following completion of the excavation and injection elements of the cleanup action.

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

No. This cleanup action constitutes the entire project. There are no planned cleanup activities beyond what is assessed in this checklist.

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 and reports have been prepared for the cleanup action addressed in this checklist:

- *Former Park Laundry Draft Cleanup Action Plan (CAP), Ecology, 2023*

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.

There are no known applications pending governmental approvals for work in the Project Area.

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

The following applicable or relevant and appropriate requirements apply to the cleanup action:

- *Resource Conservation and Recovery Act (RCRA): Disposal of any material off site would be subject to RCRA to ensure appropriate disposal of waste, including hazardous and nonhazardous material.*
- *Washington State Hazardous Waste Management Regulations: As with the federal RCRA regulations, the material disposed of may be subject to dangerous waste management regulations (Revised Code of Washington [RCW] 70A.300, WAC 173-303). Unless exempt from these regulations, all waste will be handled according to these regulations.*
- *The Washington State Environmental Policy Act (SEPA): The SEPA process is undertaken when a state governmental entity makes a decision. A SEPA Checklist is completed by the lead governmental agency to make a determination of impact.*
- *Underground Injection Control (UIC) Regulations: UIC regulations require permitting of a project before material can be injected into the subsurface.*
- *RCW 18.104 and WAC 173-160: Regulate water well construction minimum standards.*
- *Water Pollution Control RCW 90.48: Regulates stormwater discharge from construction sites.*
- *City of Ridgefield grading permit for earth movement: A permit will be required unless substantive compliance under MTCA is demonstrated to the City of Ridgefield.*

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 assessed by this SEPA Environmental Checklist is for implementing an Ecology-selected cleanup action under the Model Toxics Control Act (MTCA) at a former laundry business located in Ridgefield, Washington. Historically, the Property was a former laundry business used by Park Laundry, which may have performed dry-cleaning operations that likely resulted in the release of tetrachloroethene (PCE). Results of environmental investigations indicate that volatile organic compounds (VOCs) are present in soil on the Property and on neighboring properties, and VOCs are present in groundwater across a 22-acre area on and extending north and west of the Property.

The project will include targeted soil excavation and injections of groundwater treatment compounds on the Property and adjacent parcels north and south of the Property (herein, the Project Area), groundwater monitoring across the larger 22-acre VOC groundwater plume, and implementation of institutional controls. However, analysis completed for this SEPA Checklist is limited to the targeted excavation and injections at the Project Area (see Figure 1).

The proposed cleanup action includes soil excavation down to 15 feet below ground surface (bgs) on the Project Area, focused groundwater remediation via injections on the Project Area to treat PCE, institutional controls, and groundwater monitoring across a larger area. PCE-impacted soil shallower than 15 feet bgs will be excavated from the Project Area and disposed of at a Subtitle C, or other appropriate landfill. Cost-effective and environmentally protective methods of disposal, including a Contained-In Determination issued by Ecology, will be explored during remedial design.

Ecology was presented with seven cleanup alternatives in the remedial investigation/feasibility study conducted by Maul Foster & Alongi, Inc. The proposed cleanup action (Alternative 4 in the feasibility study) described herein and selected by Ecology for implementation includes the following elements:

Soil Cleanup

The soil excavation extent includes an approximately 1,700-square-foot area to approximately 15 feet bgs and a 300-square-foot area to 3 feet bgs (approximately 1,000 cubic yards total). The excavation areas are defined by the extent of soils with PCE concentrations greater than the site remediation level of 0.05 mg/kg. A remediation level of 0.05 mg/kg was selected to guide the removal of soil containing PCE at the site. Removal of this material will aid in and increase site-wide degradation of PCE and related chemicals to below the cleanup levels.

Confirmation samples will be collected from excavation sidewalls. The excavation will be backfilled with clean, imported fill to existing ground surface and compacted, with replacement in kind of disturbed paved areas. Monitoring wells MW01 and MW21 will be decommissioned (see Figure 1).

Groundwater Cleanup

Groundwater will be treated in situ on the Project Area, using injection points. For the purpose of the Draft CAP, the treatment area is 9,700 square feet at an average depth of 5 to 15 feet bgs. The remediation material is a reducing agent with enhanced bioremediation solutions. The injections are also intended to remediate soil below the water table with chemical concentrations exceeding cleanup levels.

Monitoring Well Installation and Ongoing Monitoring

Three new monitoring wells will be installed in the lower water-bearing zone to confirm the vertical extent of contamination. The wells will be installed using telescoped casing methodology to prevent drag down of contamination in the upper water-bearing zone to the lower water-bearing zone. The exact locations of the monitoring wells will be selected by Ecology during remedial design.

Ongoing monitoring includes both performance and confirmation monitoring. Monitoring will be conducted until the cleanup levels are achieved at the Project Area. Confirmation monitoring will be conducted in all Project Area wells where groundwater has not previously met cleanup levels for at least four consecutive events. All monitoring wells will be decommissioned once cleanup levels are met in four quarters of monitoring.

Institutional Controls

An environmental covenant that prohibits groundwater use on the Property for irrigation, potable drinking water, or any use requiring human contact will be placed on the Property. A vapor barrier or control system (or other Ecology-approved approach) will be required for any building construction in the Project Area, also via an environmental covenant. These institutional controls will be enacted within one year of finalization of the CAP. Assessment may be undertaken periodically to determine whether continuation of institutional controls is required.

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.

The former Park Laundry Property is located at 122 N. Main Avenue in Ridgefield, Washington. The Property and adjacent properties where the cleanup action will be completed include Clark County parcels 71040000, 71030000, 71042000, and 67990000, located in the NE quarter of section 24, township 4 north, and range 1 west of the Willamette Meridian.

For the purposes of this SEPA Checklist, the Project Area is defined as the area of ground-disturbing activities (excavation and injections) resulting from the remedy; this includes the Property the two vacant lots located directly north of the Property and the parcel located directly south of the Property, collectively (see Figure 1).

B. Environmental Elements [HELP]

1. *Earth* [help]

a. General description of the Site:

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

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

The Site is relatively flat with minimal slope (approximately 5 percent).

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.

Soils in the proposed excavation and injection area consist of fine and silty sand to a depth of 15 feet bgs. An aquitard, composed of clayey material, underlies the sand and silty sand. The depth to clay, and therefore the thickness of the surficial silty sand, increases to the north and west. Both the surficial silty sand unit and the clay unit are considered Pleistocene alluvium. The aquitard is unsaturated, and the shallow groundwater is perched in the overlying sand and silty sand. The clay unit is approximately 40 feet thick, with the bottom approximately 55 to 60 feet bgs.

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

No. In addition, according to the Washington Department of Natural Resource's Geologic Portal Map, the Project Area is National Earthquake Hazards Reduction Program (NEHRP) Seismic Site Class C and exemplifies "Very Low" susceptibility to liquefaction.

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.

The soil excavation extent includes an approximately 1,700-square-foot area to approximately 15 feet bgs and a 300-square-foot area to 3 feet bgs, for a total excavation volume of approximately 1,000 cubic

yards. The excavation will be backfilled with clean, imported fill to existing ground surface and compacted. Surface restoration will be completed with gravel or asphalt pavement to match previous conditions.

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

Erosion may occur as a result of ground-disturbing activities during soil excavation. To minimize potential erosion, the contractor will implement erosion- and sediment-control best management practices (BMPs) identified in a project-specific Temporary Erosion Control Plan.

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

There will be no change in the amount of impervious surfaces at the Project Area. Areas of existing impervious surfaces will be backfilled and graveled or paved following excavation activities.

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

To prevent erosion, or other impacts to the earth, the contractor will implement erosion-control BMPs identified in a project-specific Temporary Erosion Control Plan.

2. Air [help]

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.

Emissions to the air will be limited to the duration of remedy implementation. Excavating soils with VOCs could result in sort-term releases of tetrachloroethylene (PCE to) the air. A project-specific health and safety plan (HASP) would require monitoring for organic vapors during the excavation, with specified action levels. In addition, heavy equipment and vehicle traffic may generate particle pollution from dust and emissions that includes nitrogen oxides (NOx), carbon monoxide (CO), and PM10 (dust) during implementation of the remedy. The release of pollution will be temporary and localized at the Project Area for the duration of construction.

Groundwater monitoring will require periodic vehicle trips to and from the Project Area until cleanup levels are achieved. Ecology will also periodically visit the Project Area to inspect the constructed remedy to verify that it remains effective. The vehicle trips produced by these activities will 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 will affect the project.

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

Air Impact and Emissions Reduction/Control Measures During Project Construction
During construction, temporary erosion-control measures will be implemented by the contractor to control fugitive dust release. Contractor staging/laydown will also be located in proximity to the Project Area and, where possible, vehicles will not be allowed to idle; these measures will reduce vehicle emissions. Also, when excavating soils with VOCs, measures from a project-specific HASP will be implemented to address potential emissions.

Measures to Control Post-Construction Air Impacts
The remedy includes implementation of institutional controls in the form of an environmental covenant, which will place a number of general and specific prohibitions, restrictions, and requirements on activities at the Project Area. This will include a requirement that, prior to any future development involving occupied structures, soil vapor risk will be evaluated in consultation with Ecology using the current and appropriate soil vapor guidance documents. Mitigation measures, if determined necessary, will be installed to prevent vapor intrusion.

3. Water [help]

a. Surface Water: [help]

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 Project Area is located in an urban landscape with no adjacent water bodies.

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.

Not applicable. No project work will be conducted over, in, or adjacent to any surface water body.

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.

Not applicable. There are no surface water bodies or wetlands at the Project Area, and therefore no fill and dredge material will be placed in or removed from surface water or wetlands.

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

Not applicable. The proposal will 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.

No; according to Federal Emergency Management Agency Flood Insurance Rate Maps, Panel 53073C1632E, the Project Area is not in a 100-year 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 remedy does not involve any discharges of waste materials to surface waters.

b. Ground Water: [help]

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.

The soil excavation element subject to this SEPA analysis may require dewatering to advance the excavation. That water would be contained and characterized for appropriate treatment and disposal.

The groundwater monitoring element of the cleanup action will be conducted following remedy implementation and will require minor groundwater withdrawals from monitoring wells for sample collection and laboratory analysis. The volume of groundwater withdrawn will be negligible. Groundwater will not be withdrawn for drinking water use.

Discharges to groundwater would occur, as the cleanup action includes injection points, which will discharge remediation product (mixed with water prior to injection) into the ground. These injection points will require Ecology authorization as a Class V aquifer remediation well.

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 remedy will not discharge waste material into the ground from septic tanks or any other source.

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.

Runoff patterns will remain unchanged as a result of project implementation. The cleanup action includes excavation and restoration of existing impervious areas and will not change the runoff conditions. Post-cleanup action runoff will continue to flow to stormwater sewers to the south and west of the Project Area as it does currently.

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

No.

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

No, the cleanup action would not alter or otherwise affect drainage patterns on or in the vicinity of the Project Area.

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

A project-specific Temporary Erosion Control Plan will be prepared; the BMPs outlined in this plan will be implemented by the contractor to reduce or control stormwater runoff during construction.

4. Plants [help]

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

_X_ deciduous tree: alder, maple, aspen, other
____ evergreen tree: fir, cedar, pine, other
_X_ 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

The Project Area is almost entirely covered by impervious surfaces (compacted gravel), with the exception of a scattering of deciduous trees and shrubs along the periphery of the proposed cleanup action area.

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

No vegetation will be removed or altered as a result of the proposed remedy.

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

There are no known threatened or endangered plant species 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 area subject to cleanup is currently graveled, and therefore there are no plants or landscaping to preserve.

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

The applicant is not aware of noxious or invasive plant species on or near the Project Area.

5. *Animals* [help]

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, other:
mammals: deer, bear, elk, beaver, other:
fish: bass, salmon, trout, herring, shellfish, other _____

The graveled Project Area is surrounded by urban development and commercial uses that do not provide suitable habitat for wildlife. However, birds and other animal species endemic to an urban environment may use the Project Area.

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

Based on the Washington State Department of Fish and Wildlife Priority Habitat and Species mapping tool, there are no threatened/endangered, or priority species and habitats within at least 500 feet of the Project Area.

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

The Project Area is within the Pacific Flyway and therefore is part of a migration route; however, local and migrating populations of birds and wildlife in the area are most likely to utilize the high-quality habitat that the nearby Ridgefield National Wildlife Refuge (RNWR) provides. This area is located at least 1,400 feet west of the Project Area and will not be impacted by the cleanup action.

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

The cleanup action will not impact wildlife or habitat, so no measures to preserve or enhance wildlife are necessary.

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

There are no known invasive animal species on or in the immediate vicinity of the Project Area.

6. *Energy and Natural Resources* [help]

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.

During and after cleanup action implementation, minor amounts of fossil fuels will be used to power motorized equipment. No other energy or natural resource needs will occur as a direct result of the project.

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

The project will not adversely impact adjacent properties' use of solar energy, as no vertical structures will be built as a part of the cleanup action.

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:

During the excavation and injection elements of the cleanup action, practices to encourage efficient energy use, such as limiting equipment idling time and locating construction staging/laydown areas in proximity to the work area, will be implemented. The completed project will not result in adverse energy or natural resource impacts; therefore, no long-term energy/resource conservation measures are required or proposed.

7. Environmental Health [help]

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.

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

Historically, the Property was used by Park Laundry, which may have performed dry-cleaning operations that likely resulted in the release of PCE. Results of environmental investigations at the Project Area indicate that VOCs are present in soil on the Property and on neighboring properties, and VOCs are present in groundwater across a 22-acre area north-northwest of the Property.

Soil investigations were conducted in 2010 and 2011 to delineate the nature and extent of soil impacts. Soil impacts from PCE were observed down to 15 feet bgs. The lateral extent of soil impacts is generally confined to the Property and the adjacent properties to the south and north (which correspond to an area directly behind the former Park Laundry building).

PCE and tetrachloroethene (TCE) are the primary contaminants of concern in groundwater. The extent of groundwater impacts covers an approximately 22-acre area on and north and west of the Property and is shown on Figure 2.

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.

There are no known hazardous liquid or gas transmission pipelines in the excavation and injection areas; however, as mentioned above, the Project Area does contain contamination. The purpose of the project is to remove or immobilize the existing contamination.

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.

No new toxic or hazardous chemicals will be stored, used, or produced during construction activities or monitoring at the Project Area. While groundwater treatment would be implemented via injection, the compounds used for remediation are not considered toxic or

hazardous.

4) Describe special emergency services that might be required.

The project will not require special emergency services.

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

The proposed 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 health and safety procedures would be project-specific and developed based on the following:

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

During project construction, excavated soils will be managed and disposed of in coordination with Ecology. In addition, BMPs will be implemented by the contractor to ensure that contaminated media are not inadvertently transported off the Project Area through erosion or stormwater.

Institutional controls will be implemented for long-term control of environmental health hazards. An environmental covenant will be established, which will place a number of general and specific prohibitions, restrictions, and requirements on activities at the Project Area.

b. Noise

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

No existing noise will affect the cleanup action.

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)? Indi-cate what hours noise would come from the site.

Noise generated from heavy machinery and construction/personal vehicle traffic during excavation and construction will cause short-term noise impacts. These impacts will be limited to normal working hours and are consistent with noise generated in the downtown district. Long-term monitoring would not generate noticeable noise.

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

Construction activities will comply with local noise ordinances.

8. Land and Shoreline Use [help]

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.

The Property is currently used as a gravel parking lot. A vacant lot with some mature trees followed by Simons Street are directly north; an alleyway (owned by the City of Ridgefield) and a concrete skate park are directly east; a police station is directly south; and Main Avenue followed by a restaurant are directly west of the Property (122 N. Main Avenue, Ridgefield, Washington).

The proposed cleanup action will temporarily disrupt use of the parking lot during the excavation and injection phases. An environmental covenant that prohibits groundwater use on the Project Area for irrigation, potable drinking water, or any use requiring human contact will also be placed on the Property. While this wouldn't affect physical future land uses that could be established, it will be a consideration for new development proposed at the Project Area in the future. Also, a vapor barrier or control system (or other Ecology-approved approach) will be required for any building construction in the Project Area. This would also be controlled via an environmental covenant.

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?

The Project Area has not been used as working farmlands or working forestlands, and the cleanup action will not convert such lands to other uses.

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 cleanup action will not affect or be affected by normal business operations of surrounding working farmland or forestland.

c. Describe any structures on the site.

Not applicable. There are no structures on the Project Area.

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

Not applicable. No structures will be demolished as a part of the cleanup action.

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

The Project Area is zoned Downtown Mixed Use (DMU, CMU).

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

The current comprehensive plan designation of the Project Area is Central Mixed Use (CMU).

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

Not applicable. The Project Area does not contain 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 Project Area has not been classified as a critical area by the city or county.

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

People do not currently reside or work at the Project Area, and the cleanup action will not change that condition.

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

Not applicable. The project will not displace any workers or housing availability at the Project Area.

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

No mitigation measures to reduce displacement impacts are necessary, as no displacements will result from the cleanup.

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

Not applicable. No measures are needed because the cleanup action will not change the existing land use or impact future land uses.

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

Not applicable. The cleanup action will not impact agricultural lands or forestlands of long-term commercial significance; therefore, no mitigation measures are required or necessary.

9. Housing [help]

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

Not applicable. No housing units will be provided as a part of the cleanup action.

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

Not applicable. No housing units will be eliminated as a part of the cleanup action.

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

Not applicable. No housing impacts will occur; therefore, no control measures are proposed.

10. Aesthetics [help]

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

Not applicable. No structures will be built as part of the cleanup action.

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

Not applicable. No structures will be built as part of the cleanup action.

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

Not applicable. No aesthetic impacts will result from the cleanup action, so no measures to reduce or control aesthetic impacts are necessary.

11. Light and Glare [help]

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

Not applicable. The project will be implemented during daylight hours. No additional light or glare is anticipated.

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

Not applicable. The proposed project will 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 will affect the project.

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

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

12. Recreation [help]

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

The Ridgefield Skate Park is east-adjacent to the Project Area. Other recreational opportunities are found at Overlook Park, 300 feet south of the Project Area, and Ridgefield Waterfront Park, 1,000 feet west of the Project Area.

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

No. The cleanup action will not displace the existing skate park or any other recreation opportunities in the area.

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

Construction BMPs will be implemented to mitigate dust impacts caused by construction.

13. Historic and cultural preservation [help]

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.

According to the Washington Department of Archeology and Historic Preservation (DAHP), the Ridgefield Hardware store (Resource ID 501893) located on the corner of N Main Avenue and Pioneer Street, south of the Project Area, is "determined eligible" for listing. The project will have no impact on the Ridgefield Hardware store. No other buildings, structures, or sites in the excavation and injection areas that are 45 years or older and currently in the DAHP's database are designated as eligible or potentially eligible for listing on preservation registers.

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 landmarks, features, or other evidence of Indian or historic use or occupation at the Project Area.

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.

The DAHP's WISAARD database was consulted to assess the potential impacts to cultural and historic resources on or near the Project Area.

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.

A project-specific Monitoring and Inadvertent Discovery Plan (MIDP) will be prepared and submitted to Ecology for approval before ground-disturbing work begins. Archaeological monitors will be present on site, if required by Ecology and as necessary; procedures in the MIDP will be followed during remediation. The MIDP includes steps to ensure that archaeological sites will be protected throughout the environmental evaluation and mitigation activities, as necessary.

Per the Section 106 National Historic Preservation Act process, the project proponent will maintain lines of communication with the DAHP, affected Indian tribes, and other interested

parties in the event that an inadvertent discovery is made during the excavation and injection phases of the cleanup action.

14. Transportation [help]

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.

The Project Area can be accessed by a driveway on N Main Avenue, as shown on Figure 1.

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?

The Project Area is served by C-Tran, the current on-demand rideshare platform that provides door-to-door service. The closest C-Tran bus stop is the Pioneer Street & S 56th Place stop on Line 48, 2.6 miles east of the Project Area.

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

The excavation phase of the cleanup action may cause short-term limitations on existing parking during business hours. During the injection phase, limitations on existing parking are not anticipated, as all workers will likely park on the Property. The cleanup action will not add or remove long-term parking.

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 project will not require new roads or improvements to existing roads.

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

The proposed project will not use water, rail, or air transportation.

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?

Not applicable. The cleanup action, once complete, will not be a traffic generator or generate traffic higher than existing levels.

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.

The project will not interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area.

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

The cleanup action, once complete, will not result in transportation impacts; therefore, no transportation impact reduction or control measures are proposed. During the excavation phase of the cleanup action, a Traffic Control Plan, if needed, will be developed and implemented to reduce transportation impacts associated with dump trucks entering and exiting the Project Area.

15. Public Services [help]

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 project will not result in an increased need for public services.

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

Coordination with the Ridgefield Police Department regarding construction activities will be maintained throughout construction of the project to avoid impacts to police operations. No other impacts to public services from remedy implementation are anticipated.

16. Utilities [help]

a. Circle utilities currently available at the site:
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

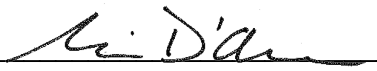
Utilities provided at the Project Area are those commonly provided in other urban environments.

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 project may require use of water and electricity that is currently available on the Project Area; this will be limited to the duration of the excavation and injection phases of the cleanup action, with no alterations to the existing systems. No other utilities are anticipated to be required.

C. Signature [HELP]

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 Merideth D'Andrea, RG LG

Position and Agency/Organization Principal Geologist at Maul Foster & Alongi

Date Submitted: 06-15-2023

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Project: M0239.33.005 Produced By: jelliott Reviewed by: mdandrea Print Date: 6/14/2023

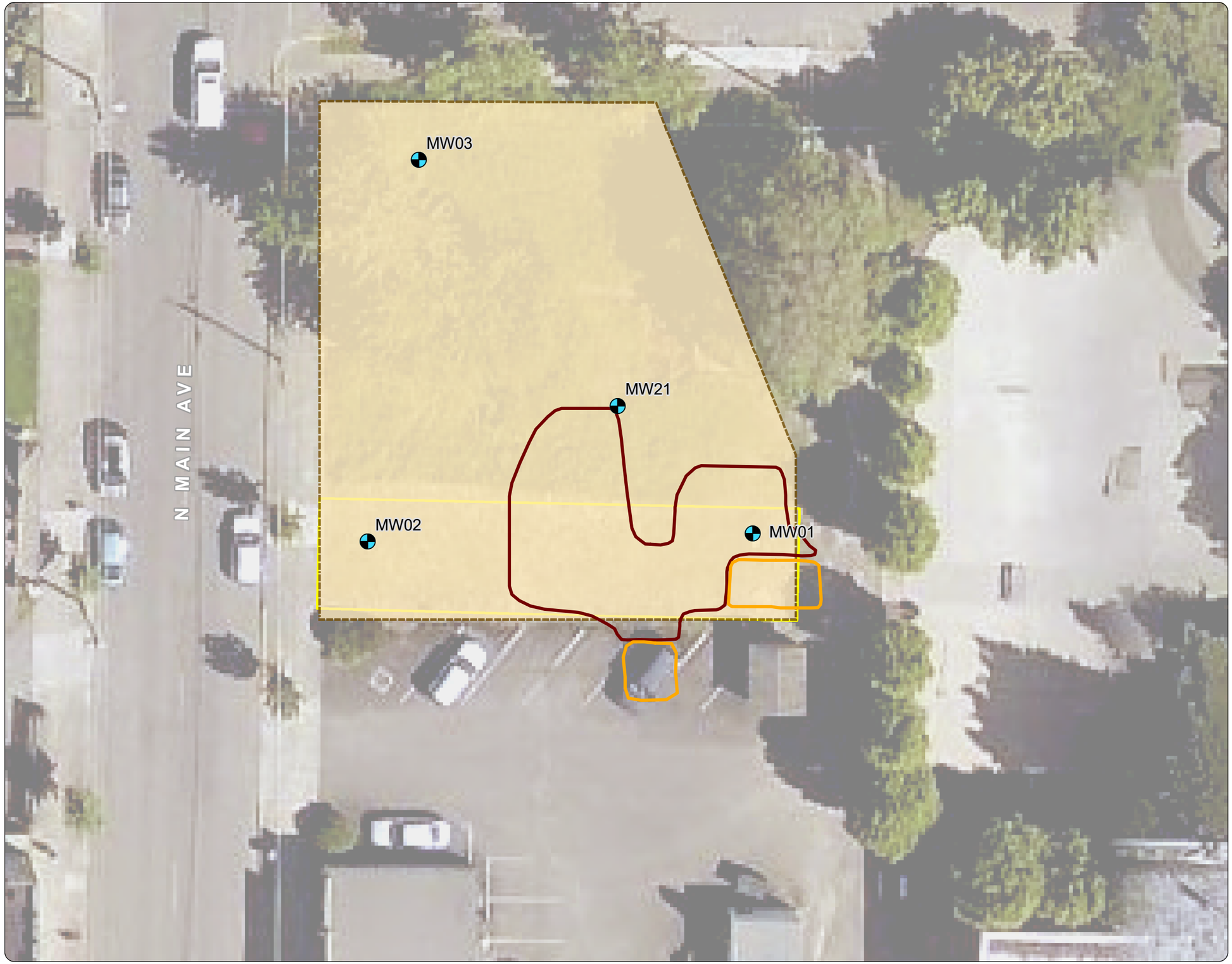

Figure 1
Cleanup Action

Former Park Laundry
Union Ridge Investment Company
Ridgefield, Washington

Legend

- Monitoring Well
- 3-foot Proposed Excavation
- 15-foot Proposed Excavation
- Focused Injections
- Property Boundary

0 10 20
Feet

Data Source
Aerial photograph (2014) obtained from Clark County.

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Figure 2
Groundwater Plume Extent

Former Park Laundry
Union Ridge Investment Company
Ridgefield, Washington

Legend

- Park Laundry Monitoring Well
- Port of Ridgefield Monitoring Well
- Property Boundary
- Estimated Plume

Notes
LRIS = Lake River Industrial Site
The estimatd plume extent was determined based on exceedances of the Model Toxics Control Act (MTCA) Method A cleanup levels for groundwater.

0 100 200
Feet

Data Sources
Aerial photograph (2015) obtained from U.S. Geological Survey; taxlots (2014) obtained from Clark County GIS; Port monitoring wells obtained from Port of Ridgefield.

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