



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office

PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

August 26, 2024

William Furniss
4221 NE St Johns Rd #G
Vancouver, WA 98661

RE: Generator Closure at Crown Plating
EPA/State Identification Number: WA0000905000

Dear William Furniss:

This letter addresses the best practices to close Crown Plating to reduce liability and to address the requirements of the [Dangerous Waste Regulations](#).¹ Please use this letter, the Department of Ecology's (Ecology) [Guidance for Clean Closure of Dangerous Waste Units and Facilities](#),² and the dangerous waste regulations to guide the closure activities at Crown Plating.

Ecology considers a site closure complete when actions have been sufficient to:

- Define potential risks to human health or the environment caused by your management of hazardous materials and wastes.
- Minimize the need for future decontamination or waste removal.
- Control, minimize or eliminate post-closure escape of dangerous wastes or dangerous constituents to the environment.
- Return the site to its original appearance to the degree possible given the nature of previous activities.

The Dangerous Waste Regulations specify requirements for different generator units and generator categories. Required actions are specific to the site and site operations.

Required Actions:

1. Dangerous Waste Central Accumulation Areas – Properly designate and dispose of any dangerous waste accumulated in containers and tanks. All contaminated equipment and structures must be decontaminated or removed. All residues and clean up waste must be accurately [designated](#).³

¹ Chapter 173-303 WAC: <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303>

² <https://fortress.wa.gov/ecy/publications/summarypages/94111.html>. If you need a paper copy, please contact Ecology at 360-407-6752.

³ <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-303-070>

2. Process Areas – Clean up any dangerous waste residue deposited on floors, equipment, or structures in process areas. All residues and clean up waste, including wash waters, must be accurately designated and disposed.
3. Hazardous material/chemical clean outs – Any discarded or unusable material must be designated and properly disposed. If the materials are usable, consider contacting the product manufacturer or vendor to return as product rather than waste.
4. After equipment is cleaned and removed, complete an inspection of all floors, walls, and other structures located in areas of the facility where dangerous wastes were generated or accumulated.⁴ Document the inspection including photographs and an inspection log. Focus on determining if contaminants were released through cracks or gaps in concrete, or through floor drains or other conveyances. Focus on determining which structures will undergo decontamination or removal, based on the presence of contaminants.
5. Determine risks and review potential releases or impacts to the environment. If cracks, gaps, or other deterioration of the secondary containment unit(s) are observed during closure of the central accumulation area(s), sampling and analysis should occur to determine if environmental media (soil, ground water, surface water, and sediment) has been contaminated. Sampling may need to be conducted if a history of spills occurred at the site. If you determine that soil or groundwater was impacted, the site must be cleaned to meet the [State's Model Toxics Control Act \(MTCA\) standards](#).⁵
6. Additional Reports – Provide the following documentation, per WAC 173-303-220(3):
 - a. Copies of the uniform hazardous waste manifests for all dangerous waste shipped off site from the time closure started to the final closure date.
 - b. A copy of any inspection results (photographs and written documentation) demonstrating that the dangerous waste central accumulation area(s) have been thoroughly cleaned and closed.
 - c. A statement briefly describing what operations (if any) will remain in place.

You may contact me at (360)701-5419 or edth461@ecy.wa.gov if you have questions or need further information.

Sincerely,



⁴ The federal "clean debris standard" (defined in 40 CFR 268.45) considers a visual inspection sufficient to determine if floors, sumps, equipment or other structures require additional decontamination beyond the initial effort. Source sampling and analysis can also be used to verify that structures have been adequately decontaminated.

⁵ Chapter 173-340 WAC: <https://app.leg.wa.gov/wac/default.aspx?cite=173-340>

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Crown Plating
EPA/State ID Number: WA0000905000
Generator Closure

Eden Thorkildsen
Hazardous Waste Compliance Inspector
Hazardous Waste and Toxics Reduction Program

Sent by email: William Furniss, crownplatinginc@comcast.net
ecc: Jacob Beck, jbeck@actenviro.com
Evan Long, elon461@ecy.wa.gov
Marian Abbett, mabb461@ecy.wa.gov

To request an ADA accommodation, contact Ecology by phone at 360-407-6831 or email at ecyadacoordinator@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341.