



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Southwest Region Office
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**STATE ENVIRONMENTAL POLICY ACT
DETERMINATION OF NONSIGNIFICANCE**

October 6, 2025

Lead Agency: Department of Ecology – Hazardous Waste and Toxic Reduction – Corrective Action
Agency Contact: Stephanie Krupp

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Lead Agency File Number: Dangerous Waste Permit – WAD092300250

Description of proposal:

This project is proposed to clean up contaminated groundwater, address soil contamination, and continue abating vapor intrusion at a corrective action site managed by The Department of Ecology who is authorized by the Environmental Protection Agency (EPA) to implement corrective action under MTCA and has a permit for corrective action at this site.

To comply with the Dangerous Waste Regulations, Chapter 173-303 WAC, and the Model Toxics Control Act, Chapter 173-340, Burlington is required to clean up contamination to appropriate levels. The cleanup remedy has been chosen, and a Cleanup Action Plan (CAP) is being finalized coinciding with the SEPA review. The remedy outlined in the CAP will include the following:

- grouting of a utility trench under the stormwater piping,
- continued operation of existing inhalation pathway interim measures,
- augmenting existing surface covers by paving select areas on site,
- long term monitoring and maintenance of the pavement cover,
- treatment of groundwater around select areas of the site using two different chemical injections, in-situ bioremediation (ISB) and in-situ chemical oxidation (ISCO),
- institutional controls,
- and groundwater monitoring.

The site is located at 625 S 32nd Street, Washougal, WA 98671 (Latitude: 45.572008/ Longitude: -122.3378826) in Clark County. The property is situated within a diked portion of the Columbia River Floodplain in the Camas/Washougal Industrial Park which was historically low marshlands. The site has been zoned as industrial and is expected to be zoned as such for the foreseeable future.

Land use in the vicinity of the site is also zoned industrial. Burlington is bordered on three sides by other industrial sites and on the eastern side by the Steigerwald Lake National Wildlife Refuge.

Applicant: Burlington Environmental

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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 and Cleanup Action Plan. This is available at: *(webpage address to be inserted)*

This determination is based on the following findings and conclusions:

The Burlington Environmental facility (Burlington) holds a Resource Conservation and Recovery Act (RCRA) (Code of Federal Regulations [CFR] Title 40 Parts 260-299) dangerous waste management facility permit (RCRA Part B Permit WAD092300250). Since 2002, Burlington has ceased the operation of treating and disposing of waste onsite and now continues to operate as a dangerous waste transfer facility and transporter for the Paint Care Program. Despite no longer treating or disposing of dangerous waste, Burlington must maintain their permit until corrective action measures are complete. One of the major provisions of the Hazardous and Solid Waste Amendments (HSWA) to RCRA [Section 3004(u)] requires corrective action for releases of hazardous waste or hazardous constituents from Solid Waste Management Units (SWMUs) at hazardous waste treatment, storage, or disposal facilities (TSDFs). Under Section 3004(u), any facility that has applied for a RCRA hazardous waste management facility permit is subject to the corrective action process. The corrective actions provisions of the RCRA permit are being completed under the direction of Ecology using an Agreed Order. The proposed work is compiled in a CAP developed by Ecology and Burlington. Implementation of the CAP is required by new Agreed Order DE 24122.

Burlington is working with Ecology and the EPA to address contaminants of concern on the site. As described earlier, a remedy has been selected and will be implemented per the CAP once finalized. This remedy is described in detail below.

Source control of the contamination to prevent direct contact with workers will be complete by maintaining the current surface cover and by paving additional areas of the site. To mitigate the possibility of shallow groundwater migrating through preferential pathways like utility lines, the storm water drain utility line will be grouted and filled. This will be done along the east property line closest to the Steigerwald Lake National Wildlife Refuge.

An interim measure was previously implemented for an impacted building on the site. The building was impacted by volatile organic compounds (VOCs) and was remediated by installing a system to decrease pressure under the building and a conveyance stack through the roof of the building for



VOCs. This prevents VOCs from entering the building. This system will continue to be operated and strictly monitored. The system will only be shut down if monitoring indicates VOC levels are below levels protective of human health and the environment.

To address subsurface contamination of groundwater two types of in-situ injections will be implemented on property. These treatment technologies, ISCO and ISB, will mitigate contaminants of concern, 1,4 dioxane and chlorinated solvents.

ISCO will be used to address 1,4 dioxane in groundwater. A Modified Fenton's Reagent is proposed and will oxidize the contaminant. Bench scale studies will be completed prior to implementation to determine the optimal substrate makeup and dosage. This will help to reduce any metals releasing from the surrounding soil and manage pH. The potential injection substrates will include a catalyst, sodium persulfate, and hydrogen peroxide.

ISB will be used to address chlorinated solvents and is a biological treatment process that utilizes degradation to break down contaminants where they are located. Emulsified vegetable oil and zerovalent iron will be the two substrates injected and will provide a carbon source for the natural bacteria to break down the chlorinated solvents. Bench scale studies will be conducted prior to implementation to determine the optimal makeup and dosage.

To ensure the protection of human health and the environment for the future of the site, a long-term monitoring program as well as institutional controls (ICs) will be put in place.

In accordance with WAC 173-340-410 long-term compliance monitoring will be addressed through a groundwater monitoring program and will confirm the following:

- **Protection Monitoring:** human health and the environment are adequately protected during construction and operations of cleanup. This will be addressed in a site-specific health and safety plan.
- **Performance Monitoring:** the cleanup action attains cleanup or other performance standards.
- **Confirmational Monitoring:** the long-term effectiveness of the cleanup action.

Long-term and temporary institutional controls will be put in place. Temporary ICs will be implemented to protect human health and the environment while remedial actions are underway. These can help prohibit certain actions to protect workers from soil or groundwater contaminants or be engineering controls to do the same. Long-term ICs like deed restrictions or other protective controls will be used. These will limit the site to industrial use only and put in place strict protective measures for land and groundwater usage.

The Cleanup Action Plan is designed to protect human health and the environment from site-related contamination. Its purpose is to clean up the site so that current and future receptors are protected from contaminants.

During implementation of the remedy a site specific Health and Safety Plan will be used to address all concerns for site workers related to potential worker contact with impacted soil or contaminated groundwater.



This DNS is issued under WAC 197-11-340 and the comment period will end December 6th, 2025. All comments received prior to this date will be considered.

Please send written comments to: *eComments web address to be inserted.* *Directions and more information on how to request a eComment from your Program Administrator @ [eComments - Home](#)*)

Responsible Official:

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Signature _____ Date _____

This SEPA decision may be appealed in conjunction with an appeal on the underlying agency action. For more information on the SEPA appeal process, refer to RCW 43.21C.060, 075, and 080; and WAC 197-11-680. Also refer to the state Local Project Review Act since it contains provisions relating to SEPA administrative appeals. Anyone interested in appealing a SEPA procedural issue should contact the lead agency to determine what administrative appeal, if any, will be allowed. Questions about the availability of administrative appeals for substantive decisions should be directed to the agency making the decision.

