



Public Participation Plan: Bonneville Power Administration Ross Complex

**5411 NE Highway 99
Vancouver, WA 98666**

Hazardous Waste and Toxics Reduction Program

Washington State Department of Ecology
Southwest Region Office
Lacey, Washington

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Hazardous and Toxic Materials Handling Building, Bonneville Power Administration Ross Complex, courtesy of the U.S. Department of Energy.

Related Information

- EPA Facility ID: WA1891406349
- Cleanup site ID: 536
- Facility site ID: 199
- [Ecology's dangerous waste permits webpage](#)¹

Contact Information

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¹ <https://ecology.wa.gov/regulations-permits/permits-certifications/dangerous-waste-permits>

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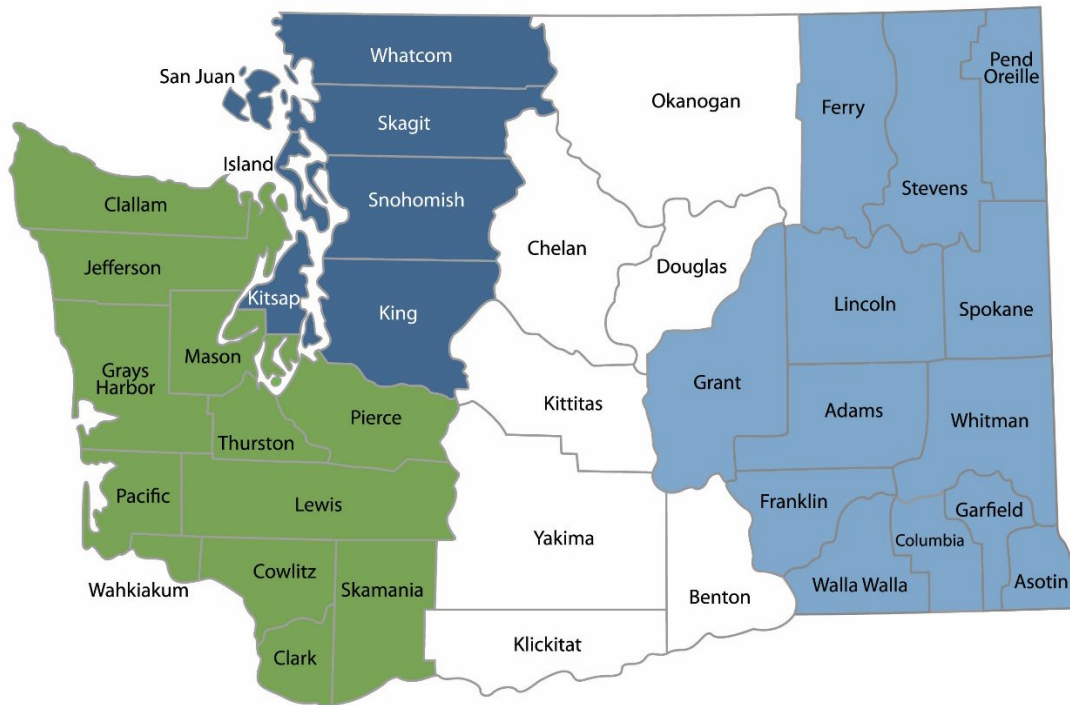
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Department of Ecology's Region Offices

Map of Counties Served



Southwest Region
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Northwest Region
206-594-0000

Central Region
509-575-2490

Eastern Region
509-329-3400

Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 47600 Olympia, WA 98504	360-407-6000

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DEPARTMENT OF
ECOLOGY
State of Washington

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Public Involvement in Hazardous Waste Permitting

Washington State Department of Ecology (Ecology, we) developed this public participation plan (PPP) in cooperation with the United States Department of Energy, Bonneville Power Administration (BPA) Ross Complex.

The PPP describes how we involve the public in the issuance of a dangerous waste treatment, storage, and disposal (TSD) permit.

We encourage the public to:

- Learn about and get involved in decision-making opportunities.
- Provide input about permit conditions.

Public participation activities are coordinated between the liable parties and Ecology. We must make sure the outreach complies with Washington State's dangerous waste regulations and the federal Resource Conservation and Recovery Act (RCRA) requirements. We will hold a public comment period before the permit is finalized.

To be included in the facility's record, your comments about the permit must be submitted during the comment period. Questions and informal comments or information about the facility are welcome anytime.

Facility contacts

To be included in the facility's record, your comments about the permit must be submitted during the formal public comment period. Questions and informal comments or information about the facility are welcome anytime.

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Bonneville Power Administration Ross Complex

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If you are unable to reach these contacts, please visit [Ecology's dangerous waste TSD permit site](#)² for up-to-date contact information.

² <https://ecology.wa.gov/regulations-permits/permits-certifications/dangerous-waste-permits>

Public Participation Activities

Members of the public may ask questions, submit informal comments, or share information about the facility at any time. Interested parties do not need to wait for a formal public comment period to contact Ecology.

However, to be included in the formal facility record, comments about the permit renewal must be submitted during formal comment periods. In addition, the public is invited to review facility documents before they become final. This is the most direct and influential way to learn more about the facility and be involved in decision-making about the permit.

How we share information with the community

For this permit renewal, we will mail notices about public comment periods to addresses around the permit area. The mailing list area varies, but it will at least include addresses within a quarter-mile radius of the facility and other interested organizations and individuals. These notices provide:

- General information about the facility.
- Contact information for submitting comments.
- How to request a meeting if one is not yet scheduled.

Ecology may also develop documents outside of comment periods to keep the community updated about the facility. These informational documents will be available online and at document repositories. Print copies may be mailed to the nearby community if we feel the message warrants the extra costs.

Postal mailing list

Ecology maintains a mailing list that includes addresses near the facility. This mailing list also includes local, state, and federal government contacts.

People on the mailing list receive public comment notices when draft documents are available.

We will add individuals, organizations, and other interested parties to the mailing list as requested. If you would like to be added to the mailing list for this facility, please contact Emilie Kadhim at 564-250-2586 or emilie.kadhim@ecy.wa.gov.

Newspaper display ads or legal notices

We will announce the public comment period for this facility in ads or notices published in [The Columbian](#).³ We will also publish notice on our [Public Input & Events Listing](#).⁴

³ <https://www.columbian.com/>

⁴ <https://ecology.wa.gov/events/search/listing>

Ecology's website and social media platforms

The following webpages have more information and related documents about this facility:

- Historical: [BPA Ross Complex](#)⁵
- Current: [Permitted dangerous waste facilities](#)⁶

Information may also be shared through social media sites, [news releases](#),⁷ and [Ecology's blog](#).⁸

Places to see print documents

During public comment periods, you can find print documents at the following locations:

Washington State Department of Ecology

Southwest Region Office

300 Desmond Drive

Lacey, WA 98503

Reception (24-hour): 360-407-6300

Fort Vancouver Regional Library

Washougal Branch 1661 "C" Street

Washougal, Washington 98671

360-906-4860

Public comment periods

We will hold a public comment period to learn your thoughts, opinions, and concerns about the proposed permit renewal. To collaborate with us about this facility, please contact Renae Z'Berg at 360-999-3493 or renae.zberg@ecy.wa.gov.

At a minimum, federal law requires a 45-day comment period to allow interested members of the public to comment on the draft documents. If there is significant interest, Ecology may extend the public comment period.

When Ecology oversees State Environmental Policy Act (SEPA) determinations, we hold comment periods for at least two weeks and may extend them to 30 days or more when other cleanup documents are concurrently available for review.

Following a comment period, we publish all the input we received and respond to significant comments and questions, as appropriate. If the comments do not result in significant changes, the documents will become final.

⁵ <https://apps.ecology.wa.gov/cleanupsearch/site/536>

⁶ <https://ecology.wa.gov/regulations-permits/permits-certifications/dangerous-waste-permits>

⁷ <https://ecology.wa.gov/about-us/who-we-are/news>

⁸ <https://ecology.wa.gov/blog>

Public events

For permit renewals, Ecology may hold public meetings as requested. At meetings, attendees can ask questions, learn more about the facility, and submit written comments when a comment period is open.

We will hold a public meeting if 10 or more people request it. We may extend a public comment period so the meeting occurs during the comment period.

Events are held at locations close to the facility that meet Americans with Disabilities Act standards. Public meetings are always announced in advance using a variety of methods.

Interaction Between State and Federal Laws

Resource Conservation and Recovery Act

The United States Congress passed the federal Resource Conservation and Recovery Act (RCRA) in 1976 to ensure safe management and disposal of hazardous waste. RCRA was updated several times to expand its scope and requirements.

RCRA's goals are to:

- Protect human health and the environment.
- Reduce waste and conserve energy and natural resources.
- Reduce or stop hazardous waste generation.

Permits

As a RCRA requirement, TSD facilities must have a **permit** to design, operate, maintain, or close their facility. TSDs manage hazardous waste by treating, storing, or disposing of them through permitted activities. TSDs may offer specialized waste services to businesses, or they may manage their own waste exclusively. TSD facilities are also called hazardous waste management facilities. RCRA requires TSDs to clean up contamination that may have occurred from past practices.

Operations

Operations performed by TSD facilities are listed in the permit and may include some or all of the following:

- **Treatment:** Hazardous wastes are treated using chemicals, incineration, oxidation, or a physical process to reduce, remove, or destroy the hazard in that waste.
- **Storage:** Hazardous waste produced on or off site is securely held until treated or disposed of. RCRA regulations require that hazardous waste storage must be done in containers, tanks, containment buildings, drip pads, waste piles, or surface impoundments.
- **Disposal:** These facilities permanently hold hazardous waste in specifically designed and constructed landfills that safeguard groundwater and surface water resources.

State Environmental Policy Act

Ecology and the Treatment Storage and Disposal facility (TSD) follow the State Environmental Policy Act (SEPA) during review and development of permits. Ecology uses SEPA to find and evaluate negative environmental impacts that could result from a proposed action.

Facility Information

Historical use

BPA Ross Complex occupies a 250-acre property in Vancouver, Washington. It is an active facility that serves as the control center for the generation and transmission of electricity throughout the Pacific Northwest. Since its construction in 1939, the Ross Complex has served as headquarters for research and testing; maintenance, construction and operations activities; and waste handling and storage for BPA. The facility also includes a fully operational electrical substation, warehousing operations, and investment recovery operations.

Within 90 days, accumulated dangerous waste must be moved to a permitted dangerous waste storage facility. For BPA, this facility is a single building called the “Hazardous Waste and Toxic Materials Handling Building” (HMB), located at the Ross Complex. The HMB receives, consolidates, and stores dangerous waste. When the facility has accumulated enough waste to make shipment economical, the waste is sent off site for proper treatment and recycling or disposal. No treatment or disposal occurs at this facility. The HMB is a centralized waste management facility serving the entire multistate BPA service area, primarily in Oregon, Washington, Idaho, Montana, California, and Wyoming.

BPA separates its dangerous waste materials into two categories:

- Routinely generated dangerous wastes regulated by RCRA or the Washington State Dangerous Waste Regulations.
- PCB solid and liquid wastes regulated under the Toxic Substances Control Act (TSCA).

These two waste streams are managed in separate waste management units within the HMB.

The facility’s dangerous waste permit applies only to the portion of the HMB used to manage dangerous waste. This permit does not apply to areas of the HMB that are used to manage TSCA-regulated waste.

Under the permit requirements, BPA can store waste for up to one year. The permit specifically addresses facility design and operating requirements for dangerous waste management in the HMB facility. It allows the storage of 31,240 gallons of waste in containers.

In 2023, the office and workshop area of the Ross high voltage electricians was moved from another Ross Complex location to the HMB. An additional service bay was built on the north side of the facility in 2024.



Figure 1. The location of the dangerous waste storage facility (HMB) is indicated with a red arrow. The area outlined in yellow is the entire BPA Ross Complex. Photo courtesy of BPA Ross.

Contamination

In 1989, the U.S. Environmental Protection Agency (EPA) listed the 250-acre area as a Superfund Site. Cleanup activities occurred. In 1995, EPA conducted an inspection of the facility and determined that the cleanup was successful. The facility is continually monitored, and contaminants remain within acceptable levels. Conditions have been incorporated in the permit for ongoing monitoring by BPA.

Wastes Managed

The permitted facility accepts and manages a wide range of waste, including:

- Flammable and combustible waste.
- Corrosive waste (acids or bases; non-neutral pH).
- Reactive waste (physical shock or exposure to water or air can explode reactive waste).
- Toxic waste (poisonous).
- Oily wastes.
- Polychlorinated biphenyl (PCB) waste under TSCA levels contained in mineral oil dielectric fluid (may cause cancer).
- Industrial waste waters.
- Solids and sludges.

- Aerosol cans (managed as dangerous waste).
- Universal waste (batteries, mercury-containing equipment, light tubes, and paints).

The permit allows BPA to keep operating the TSD facility located in the HMB. They will continue to accept and store the same types of waste as they have been for years.

Protective Permit Conditions

Ecology reviewed the facility's permit application to make sure that all areas used for waste management meet design standards for dangerous waste facilities. The permit has detailed conditions on how the areas are used, inspected, and maintained.

The permitted facility accepts wastes at a single receiving area that has coated concrete secondary containment. The facility sorts waste to make sure that wastes that could react with each other are kept separate. Facility personnel must move the waste containers to the long-term storage area within 24 hours.

The main purpose of the HMB is to accumulate enough containers for economical shipment to other off-site waste management facilities for treatment and recycling or disposal. The facility also does limited consolidation of chemically compatible wastes within containers. The shipping area is used to prepare containers for off-site shipment.

Environmental Justice and Title VI

Environmental justice promotes fair treatment of all people under environmental laws and policies, regardless of their race, color, national origin, or income.

In Washington (and across the United States), more people of color and/or low-income people live and work near industrial facilities, contaminated sites, and in neighborhoods without easy access to fresh food, green spaces, or clean air and water. These conditions negatively and unfairly affect their health and safety.

Environmental justice strategies and compliance with Title VI of the Civil Rights Act are key to addressing these inequities—especially through public involvement. We make every effort to inform and involve all people. To do this, we use demographic and environmental health disparities information to design our messaging to fit the community.

Area community

The census tract surrounding the BPA Ross Complex shows several socioeconomic and demographic characteristics that help guide Ecology's outreach approach. Ecology's 2021 demographic analysis using EPA's EJSCREEN tool identified key indicators for environmental justice considerations in the one-mile area around the facility, including low-income households, linguistically isolated residents, people with less than a high school education, children under age five, and adults over age 64.

Census data from the 2014–2018 American Community Survey show that the largest racial and ethnic group in the area is Hispanic, with 263 residents. A separate Washougal study area assessment found that 15 percent of the population identifies as a minority, 25 percent is low-income, 7 percent

has less than a high school education, and 1 percent lives in a linguistically isolated household. The population includes proportionally more young children (7 percent) and older adults (16 percent) than the statewide average.

In 2025, Ecology used the Washington Tracking Network and identified that the tract ranks 7 out of 10 for environmental health disparities and 6 out of 10 for socioeconomic factors, based on measures such as poverty, primary language, education level, and unemployment rate. Spanish is the most widely spoken non-English language near the facility, and Ecology will provide outreach materials in Spanish and work with cultural community organizations to support meaningful engagement.

To request information in another language, please contact Emilie Kadhim at 564-250-2586 or emilie.kadhim@ecy.wa.gov and remain on the line while an interpreter is connected. Ecology strives to make public participation inclusive and welcomes input on how best to reach community members.

Tribal engagement

The federally recognized Cowlitz Indian Tribe, Grand Ronde Confederate Tribes, and the Yakama Nation owns land and relies on resources that could be affected by this facility. The permitting process may also uncover cultural resources.

We will reach out to Tribes to offer opportunities to engage in the permitting process that are separate from the public involvement process. This engagement is described in a site-specific Tribal Engagement Plan, as required by [WAC 173-340-620](#).⁹ We invite Tribal members and other indigenous peoples to engage in the public involvement process as well.

⁹ <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-620>

Abbreviations and Acronyms

ADA

Americans with Disabilities Act

BPA

Bonneville Power Administration

Ecology

Washington State Department of Ecology

EPA

U.S. Environmental Protection Agency

HMB

Hazardous Waste and Toxic Materials Handling Building

MTCA

Model Toxics Control Act

PCBs

Polychlorinated biphenyls

PPP

Public participation plan

RCRA

Resource Conservation and Recovery Act

SEPA

State Environmental Policy Act

TSCA

Toxic Substances Control Act

TSD

Treatment, storage, and disposal facility

WAC

Washington Administrative Code