



Bonneville Power Administration, Ross Complex Fact Sheet



Photo of Hazardous Materials Building (HMB) – BPA Ross Complex,
courtesy of Bonneville Power Administration.

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Table of Contents

Summary	4
Ecology Authorities and Responsibilities (Chapter 70A.300 RCW)	4
Toxic Substances Control Act(TSCA)(Chapter 173-303-071(3)(k),-515 WAC,40 C.F.R. Part 761)	4
State Environmental Policy Act (SEPA) (Chapter 197-11 WAC)	5
Facility Overview and History	5
Permit Requirements (Chapter 173-303-200, and -800 through -840 WAC).....	6
Universal Waste Management (Chapter 173-303-573 WAC)	7
General Requirements for Dangerous Waste Management Facilities (Chapter 173-303-280; and -830 WAC).....	7
Waste Analysis Requirements (Chapter 173-303-300 WAC)	8
Methods for Waste Sampling and Analysis (Waste Analysis Plan) (Chapter 173-303-300(5), and -806 WAC).....	8
Waste Characterization (WAC 173-303-300)	8
Waste Designation (Chapter 173-303-070 through -100, -173, and -280 through -395 WAC).....	9
Waste Verification	10
Waste Tracking (Chapter 173-303-370 WAC)	10
Procedures for Waste Discrepancies (Chapter 173-303-370 WAC)	10
Procedures for Damaged Shipments (Chapter 173-303-201, -350 WAC)	11
Security (Chapter 173-303-310(1) and (2), -806(4)(a)(iv) WAC).....	11
Inspections (Chapter 173-303-320, -395(1)(d), -630(6), -690 through -692, -806(4)(a)(v) WAC)	11
Emergency Planning (Chapter 173-303-350 WAC).....	12
Training (Chapter 173-303-330 WAC).....	13
Corrective Action (Hazardous/Dangerous Waste Clean Up) (Chapter 173-303-645, -646, and -64610 through -646920 WAC)	13
Cleanup Activities Conducted Under CERCLA (42 U.S.C. Chapter 103)	14
Partial Closure.....	15
Closure (Chapter 173-303-610 WAC)	16
Financial Assurance (Chapter 173-303-620 WAC).....	17
Recordkeeping (Chapter 173-303-210, and -380 WAC).....	17
Reporting Requirements (Chapter 173-303-390 WAC)	17
Permit Modifications (Chapter 173-303-830 WAC).....	17
Changes to RCRA/RCRA Rules under the Hazardous and Solid Waste Amendments	18
Conclusion.....	18
Appendix A: Public Involvement Participation (Chapter 173-303-900 WAC).....	19
Appendix B: Glossary / Acronyms.....	21

Summary

The **Washington State Department of Ecology**¹ (Ecology) first issued a dangerous waste permit to **Bonneville Power Administration** (BPA) for operations at the **Ross Complex** (BPA Ross) on March 15, 2001. With the initial permit renewed in 2011, BPA Ross has operated continuously under a dangerous waste permit for the past 25 years.

Ecology is proposing to reissue the dangerous waste permit for BPA to authorize the continued management of dangerous waste at the **Hazardous Materials Building** (HMB) at the Ross Complex under specified regulatory requirements. The proposed draft permit allows BPA Ross to consolidate dangerous waste from multiple BPA locations, store dangerous waste on site for up to one year prior to off-site disposal, and conduct cleanup of historical releases of dangerous waste associated with past operations. The entire Ross Complex is subject to corrective action under this permit.

This summary supports the permit reissuance process by providing factual and regulatory basis for the permit and its requirements, describing the dangerous waste management activities conducted at the HMB, and outlining the conditions BPA Ross must meet to continue operating as a permitted **Treatment, Storage, and Disposal** (TSD) facility. It also explains how the public may submit comments on the draft permit and how Ecology will consider those comments in making a final permit decision.

The proposed permit establishes facility design and operating requirements for dangerous waste management activities conducted in the HMB. These operational requirements are detailed in this fact sheet and are intended to ensure continued protection of human health and the environment while maintaining regulatory compliance.

Ecology Authorities and Responsibilities ([Chapter 70A.300 RCW](#))

The Washington State Legislature provided Ecology authority to regulate dangerous waste in the Washington State Hazardous Waste Management Act, Chapter 70A.300 RCW. The Dangerous Waste Regulations, [Chapter 173-303 WAC](#), are the implementing rules which regulate dangerous waste. As an **Environmental Protection Agency** (EPA) authorized state, Chapter 173-303 WAC also incorporates federal **Resource Conservation and Recovery Act** (RCRA) rules. Chapter 173-303-800 WAC specifies that facilities such as the HMB, which stores and treats dangerous waste, must obtain a permit.

Toxic Substances Control Act(TSCA) ([Chapter 173-303-071\(3\)\(k\),-515 WAC,40 C.F.R. Part 761](#))

Mineral oil dielectric fluid (MODF) with **polychlorinated biphenyl** (PCB) above 50 **parts per million** (ppm) are regulated by the EPA under the TSCA regulations. Management of MODFs in compliance with TSCA regulations exempts those materials from regulation under the dangerous waste regulations. MODFs with less than 50 ppm PCBs are not regulated by TSCA; depending on their origins and PCB concentrations, they are regulated by the dangerous waste regulations or the used oil regulations. Therefore some, but not all, of the MODFs managed by BPA Ross are

¹ All **bold words** are defined in the glossary section.

subject to this permit. The TSCA portion of the HMB is used to store electrical equipment scheduled for disposal or reuse; provide draining and flushing of electrical equipment; and store oil drained from the equipment.

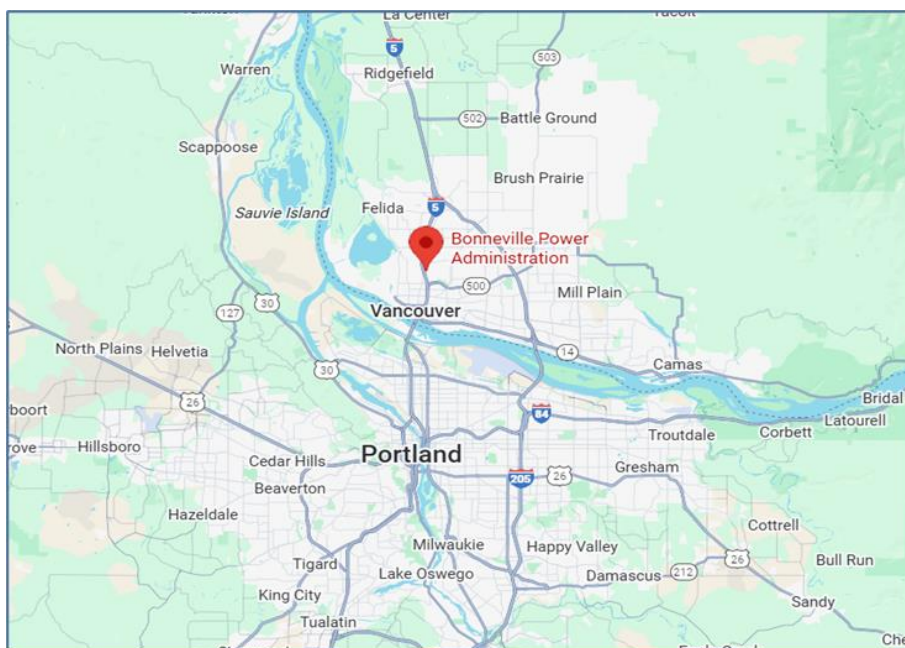
State Environmental Policy Act (SEPA) ([Chapter 197-11 WAC](#))

Ecology determined there were no probable significant adverse environmental impacts from issuing BPA Ross a dangerous waste permit and issued a “Determination of Nonsignificance” under SEPA regulations in 2001. Reissuing this permit does not require review under SEPA. SEPA regulations exempt license renewal when there are no material changes in operations (see Chapter 197-11-800(13)(i) WAC). The SEPA definition of license includes permits such as this Dangerous Waste Permit (Chapter 197-11-760 WAC).

Issuing this permit is a license renewal under definitions in the SEPA regulations, and there are no material changes in the way that BPA Ross manages dangerous waste. The HMB is not increasing their waste storage capacity, managing new or different wastes, or using different waste management processes. BPA Ross will continue using existing structures and the same operations for dangerous waste management as under the previous permit.

Facility Overview and History

BPA is a federal agency under the U.S. Department of Energy that regulates the generation and transmission of electricity throughout Washington, Oregon, Idaho, Montana, California, and Wyoming. The BPA Ross complex is located within the city limits of Vancouver, Washington. Dangerous waste management operations occur in single building called the Hazardous Materials Building (HMB).



Location of BPA Ross courtesy of Google Maps

The HMB operation provides centralized waste management services for BPA facilities located across the entire multi-state BPA service area. Operating requirements in the draft permit apply only to the parts of HMB at the Ross complex which handle dangerous waste. General categories of waste handled and stored at the HMB include used oil, dangerous waste, and PCB-containing

waste. The HMB is also used to store and handle TSCA level PCBs, this part of the facility is not included in the dangerous waste permit.

In 2023, the office and workshop area of BPA Ross's high voltage electricians were moved from another Ross Complex location to the HMB. A containment trench in this room runs continuously through the wall and is hydraulically tied to the containment trench in the adjacent shipping/receiving room. For this reason, this room is included in the dangerous waste permit, even though the room also falls under TSCA regulation. In 2024, an additional service area was added to the HMB to provide appraisal, testing, conditioning, and maintenance of electrical equipment. This service area was not incorporated into the dangerous waste permit.

According to the draft permit, Ecology must be notified prior to any construction being performed at the Ross Complex. Any **significant expansion at the HMB**, as defined in Chapter 173-303-282(3) WAC, greater than 25% of storage capacity requires a permit modification (Chapter 173-303-830 WAC). Ecology must also be notified when any construction activities occur at the Ross Complex that would disturb the property.

Permit Requirements

(Chapter 173-303-200, and -800 through -840 WAC)

BPA Ross must comply with all conditions of the permit. Any permit noncompliance constitutes a violation and is grounds for enforcement actions. This may require BPA Ross to halt or reduce activity at the HMB. BPA Ross must take all steps required by the department to minimize or correct any adverse impacts on the environment resulting from noncompliance with the permit. If BPA Ross wishes to continue an activity regulated by the permit after its expiration date, BPA Ross is required to apply for and obtain a new permit.

The major purpose of the dangerous waste section of the HMB is to accumulate a sufficient amount of waste to allow economic shipment to other off-site waste management facilities for treatment, recycling, or disposal. BPA Ross also does limited consolidation of chemically compatible waste within containers within the HMB.

Dangerous waste generated at the Ross Complex may be accumulated where first generated in **central accumulation areas** (CAA's) without a permit (Chapter 173-303-200 WAC). However, dangerous waste cannot be kept at those CAA's for more than 90 days. Therefore, BPA Ross transports waste from their CAA's to the HMB before the 90-day accumulation time limit elapses. BPA Ross can then store the waste for up to one year following the requirements in the permit.

The HMB also accepts dangerous waste from a number of BPA sites in their service area, but off site from the Ross Complex. These service areas include Montana, Wyoming, Idaho, Oregon, and California.

BPA Ross accepts all dangerous waste at a single shipping/receiving area at the HMB. This area has been designed, constructed, operated, and maintained to contain spills and leaks, prevent releases to ground and surface waters, capture wash water resulting from a cleanup, and allow removal of spilled or leaked waste as required by Chapter 173-303-395(4) WAC. BPA Ross is required to separate dangerous waste based on physical and chemical characteristics. Containers are sorted based on these characteristics. Incompatible waste is placed in individual secondary containment pallets and kept separate. HMB personnel move the containers to separate long-term storage areas each day; therefore, no storage occurs in the shipping/receiving area.

BPA Ross separates the waste according to the following Dangerous waste characteristics for shipping/receiving and storage.

- Ignitable waste (Chapter 173-303-090(5) WAC)
- Corrosive waste (Chapter 173-303-090(6) WAC)
- Reactive waste (Chapter 173-303-090(7) WAC)
- Toxic waste (Chapter 173-303-090(8) WAC)
- Oily waste (Chapter 173-303-515 WAC)
- Solids and sludges (Chapter 173-303-016 WAC)
- Universal waste (recycled): batteries, mercury-containing equipment, and lamps. (Chapter 173-303-573 WAC)
- Paint

The permit authorizes a maximum storage capacity volume of 31,240 gallons of dangerous waste in containers. No dangerous waste tanks are included in this permit.

Universal Waste Management ([Chapter 173-303-573 WAC](#))

The permit allows for management of universal waste. These include mercury switches, batteries, and lamps. Universal waste is also documented on an “Identified Waste Streams” (IWS) document. The permit is specific on how this waste is managed and stored at the HMB prior to recycling.

During review of BPA Ross’s permit renewal application, Ecology ensured the design of all areas used for waste management met dangerous waste facility standards. The permit includes detailed conditions on how dangerous waste management areas are used, inspected, and maintained.

Ecology reviewed the updated HMB plans submitted with BPA Ross’s permit renewal application and determined the following:

- Field measurements showed the depth of the secondary containment areas was sometimes deeper than indicated on the engineering plans. Ecology and BPA Ross agreed to use the depth of the written plans for a more conservative approach to estimating secondary containment capacity. Secondary containment calculations were updated in the draft permit to reflect the agreement.
- Room 101 is being used for mixed use work and office area for BPA Ross’s electricians. Dangerous waste is not stored in this room. There is, however, a containment trench for this room that was part of the original building design to allow for possible future dangerous waste storage. The containment trench runs continuously through the wall and is hydraulically tied to the containment trench in the adjacent Shipping and Receiving Room. For this reason, Room 101 is included as part of the Permitted Unit.

General Requirements for Dangerous Waste Management Facilities ([Chapter 173-303-280](#); and [-830 WAC](#))

The permit requires BPA Ross to properly operate and maintain all waste management systems in compliance with the dangerous waste regulations. BPA Ross must ensure adequate funding, staffing, training, and process controls to maintain compliance. BPA Ross should inform Ecology if they are out of compliance with any permit requirement.

The permit is specific about how BPA Ross must maintain compliance. If BPA Ross decides to change any equipment or procedures for waste management operations, they must first request, and Ecology must issue a permit modification. The permit and regulations prescribe the process

for permit modifications. It includes notification to the public about permit changes.

Waste Analysis Requirements ([Chapter 173-303-300 WAC](#))

The permit requires BPA Ross to obtain accurate and complete information for every waste stream it plans to manage. Insufficient information provided by a BPA generator is not an acceptable defense for mismanaging the waste. Requirements for waste characterization are complex and critical for the safe operation of the HMB. Waste characterization methods are used to analyze the composition and properties of waste. There are different types of waste characterization techniques, including laboratory and field analysis. The number and variety of waste streams BPA Ross accept at the HMB is limited. The HMB only manages dangerous waste generated by BPA. The permit does not allow BPA Ross to accept dangerous waste from other non-BPA entities or operations. The permit application provides specific information on the dangerous waste the HMB routinely manages or plans to manage.

Methods for Waste Sampling and Analysis (Waste Analysis Plan) ([Chapter 173-303-300\(5\)](#), and [-806 WAC](#))

BPA Ross has developed a waste analysis plan to describe the process and methods used at BPA generator locations to designate dangerous waste and the steps taken by the HMB to verify the waste once it is received for storage. Included in the waste analysis plan are specific approved methods for sampling and analyzing waste. This plan further defines verification steps, waste characterization processes, and discrepancy procedures. The waste analysis plan and the quality assurance program manual are an integral part of waste management.

Quality control follows established procedures for each type of analysis, as outlined in the Quality Assurance Program Manual. Ecology approved testing methods are defined in [Chapter 173-303-110 WAC](#). These procedures help ensure that results are reliable and consistent. Data quality is evaluated using key indicators, including:

- precision,
- accuracy,
- completeness,
- representativeness, and
- comparability.

Laboratories regularly perform internal checks using standard reference materials to confirm that testing methods are working correctly and to reduce the chance of errors. Routine audits of laboratory operations and equipment are also conducted to maintain accuracy. If any quality control results fall outside acceptable limits, corrective actions are promptly taken to address the issue and protect data quality.

Waste Characterization ([Chapter 173-303-300 WAC](#))

This permit requires reliable information on the physical and chemical properties of every waste stream BPA Ross accepts or plans to accept. This information ensures:

- Proper designation and management of waste
- Safe and effective operation of waste storage
- Compliance with this permit.
- Compliance with land disposal restrictions.

This permit supports the use of both “generator knowledge” and “laboratory analyses” to characterize a waste stream and complete a chemical waste profile. Sampling and analysis of a waste stream must be used when there is insufficient generator knowledge and manufacturer information about a waste stream that has been generated or if it is suspected that the waste stream has been contaminated with other hazardous constituents.

Waste Designation ([Chapter 173-303-070](#) through [-100](#), [-173](#), and [-280](#) through [-395](#) WAC)

Dangerous waste **designation** must begin promptly at the point of waste generation or upon the discovery of a solid waste. To assist BPA generators, BPA Ross maintains a list of commonly generated waste streams and associated profiles. BPA Ross maintains completed chemical waste profiles in a “**Identified Waste Streams**” (IWS) handbook. The IWS summarizes the waste identification, designation, and management information. It also outlines appropriate storage, DOT packaging and labeling requirements, and land disposal restrictions for each waste stream BPA Ross regularly manages. The IWSs’ are designed to account for the minor variability between generator locations. These variations will be noted on each IWS. These documents are maintained on-site at the HMB in the facility operating record.

BPA Ross has a list of 21 (routine) waste streams that their ongoing maintenance and operations generate routinely. BPA requires operators at their generating sites to follow standard operating procedures, to ensure the waste stream is managed according to the IWS. BPA Ross is required to review and recertify the IWS of each (routine) waste stream, at a minimum, every two years/24-months. BPA Ross has demonstrated to Ecology the uniformity and variability of the waste generated over time through representative sampling and consistent laboratory test results. BPA Ross must also evaluate and correct the IWS if the process of generating the waste changes or if verification testing indicates the waste has changed.

BPA generators may generate dangerous waste from episodic events, clean-up activities, or emergencies which result in wastes unique to the activity or event. The permit requires BPA generators to designate episodic, clean-up, and emergency event waste at the point of generation to meet the requirements of chapter 173-303-070(3)(a) WAC. BPA Ross may manage unique waste generated from special practices or other infrequent activities (non-routine wastes). A chemical waste profile will be created for each non-routine waste stream. Each chemical waste profile must be reviewed and approved by the BPA Ross Chemist before waste is delivered to the HMB. A waste analysis plan has been included in the permit that describes the process and methods used by BPA Ross to characterize and verify the waste received for storage at the HMB.

Clean-up waste typically consists of contaminated environmental media (e.g. soil) from ongoing BPA environmental investigation and restoration activities, including spill cleanup. These activities operate according to written site-specific or generic sampling and analysis plans that specify investigation-derived waste or remediation waste characterization and management. If contaminated media is generated as a component of a field program, these wastes must be sampled, analyzed, and designated in a manner equivalent to those identified as non-routine wastes.

Emergency event waste may include fire, natural disaster, or explosion debris, or an unplanned sudden release of dangerous waste to air, soil, surface water, or groundwater. These wastes must also be sampled, analyzed, and designated. Each waste analysis must be reviewed and approved by the BPA Ross chemist before waste can be delivered to the HMB. Parameters, analytical methods, and rationale for waste characterization are listed in the permit. Detection and

reporting limits, as appropriate, are defined by the EPA and Ecology approved methods being employed by the BPA Ross Chemistry laboratory (or another contracted laboratory).

Waste Verification

According to [Chapter 173-303-300\(2\) WAC](#), BPA Ross “must obtain a detailed chemical, physical, and/or biological analysis of the dangerous waste before they store, treat, or dispose of it”. The permit requires specific procedures, outlined in the waste analysis plan, HMB personnel must perform to verify the identity of each waste stream received at the HMB. The primary physical/chemical criterion for the safe management of wastes at the HMB is to provide segregated storage for wastes with potential incompatibilities. However, verification also ensures HMB personnel only accept waste authorized by the permit. BPA Ross provides the necessary information on a chemical waste profile and shipping papers for HMB personnel to complete necessary waste verification, determine proper waste storage, and arrange for proper off-site disposal at a permitted TSD.

BPA Ross uses a tiered verification system to check incoming shipments at the HMB:

- Tier I: All containers of each waste stream are subject to Tier I verification which includes cross-referencing shipping papers and labels, ensuring the waste codes referenced are listed in the permit, has a current profile, and visually meets the shipping paper description.
- Tier II: Select containers of each waste stream are automatically subject to a minimum of Tier I and II verification, and if needed Tier III at a frequency described in the permit. Tier II verification requires the collection of a representative sample from the tenth container of each waste stream for testing by the HMB personnel (i.e. specific gravity, pH, volatile organic chemical, ignitability).
- Tier III: The representative sample is sent to a laboratory for further analysis if sample fails previous tiers and additional analysis is needed to verify the waste stream. If multiple containers of the same waste stream are undergoing Tier III verification, then all containers of that waste stream will be placed on hold until verification is complete.

Waste Tracking ([Chapter 173-303-370 WAC](#))

BPA Ross has implemented a waste tracking system that allows tracking from the point of generation within the BPA service territory through final disposition at an offsite permitted TSDF. All containers are assigned a unique, non-repeating identification number at the point of generation. This ID number is noted both on the container label and shipping papers. The system incorporates both paper and electronic tracking mechanisms. The number remains with the container from initial generation to final disposition. The initial shipping papers and subsequent manifest are important to tracking dangerous waste.

Procedures for Waste Discrepancies ([Chapter 173-303-370 WAC](#))

Personnel are required to implement standard procedures when there is a discrepancy between the waste received at the HMB and the waste characterization or shipping papers. The waste will temporarily be stored in Room 102C within its own secondary containment device and physically isolated from other wastes stored in that room. The responsible generator will be contacted to resolve the problem. If the discrepancy is resolved, the waste containers are transferred to storage. If the discrepancy is not resolved, the waste is sampled and analyzed to determine its identity. If BPA Ross is authorized to manage the discrepant waste after the waste is characterized, the waste is transferred to HMB. If BPA Ross is not authorized to handle the

discrepant waste after characterization, then the waste is shipped via manifest to a TSD which is permitted to manage the waste.

Procedures for Damaged Shipments ([Chapter 173-303-201](#), [-350 WAC](#))

Personnel are required to inspect all incoming containers for damage during shipment. BPA Ross has implemented specific procedures in the permit in Section G: 8.4.8 for damaged shipments including steps to secure the shipment, clean up any released materials, enactment of the HMB contingency plan, and notification requirements.

Security ([Chapter 173-303-310\(1\) and \(2\)](#), [-806\(4\)\(a\)\(iv\) WAC](#))

The entire 250 acres of the Ross Complex is surrounded by a chain link fence. The main gate into the Ross Complex is attended by security guards who limit access to authorized personnel and visitors who have entry clearance. Other gates are closed and locked except when used by personnel with authorized access. A separate entry gate for trucks is attended by a security guard when deliveries are scheduled and is locked at all other times. The HMB where dangerous wastes management occurs remains locked at all times. The building is equipped with a card key activated security system. Security professionals are onsite at all times, including holidays and perform routine patrols of the facility as part of their work coverage.

Inspections ([Chapter 173-303-320](#), [-395\(1\)\(d\)](#), [-630\(6\)](#), [-690 through -692](#), [-806\(4\)\(a\)\(v\) WAC](#))

BPA Ross is required to conduct periodic inspections of the HMB areas included in this permit. The additional service area that is used by the high voltage electricians to provide appraisal, testing, conditioning, and maintenance of electrical equipment is not included in the inspection requirements. Inspections detect and prevent malfunctions, deterioration, operator error, and releases from containers and dangerous waste management units that could cause harm to human health or the environment. This permit includes:

- Daily inspections requirements were moved to the weekly schedule in this renewal. BPA Ross has advanced security measures and electronic leak detection to alert remotely in an emergency. Also, all containers are managed in storage locations with none being held in the receiving/shipping areas, thereby averting risk to human health and the environment.
- Weekly inspections of containers and secondary containment for sign of leaks, spills, releases, and evidence of cracks or other forms of deterioration.
- Monthly inspections to ensure fire extinguishers are fully charged.
- Biannual integrity inspections of secondary containment sumps by BPA Ross personnel not associated with the HMB. This person is knowledgeable in the inspection criteria outlined in the permit to evaluate the coating for defects or failure.
- Annual inspections of HMB areas where ignitable and reactive wastes are stored by a fire protection engineering contractor under the International Fire Code.

The permit specifies unacceptable conditions observed during the required inspections as well as actions and schedules required to address any problems discovered. Personnel must document results of all required inspections and any actions taken to address problems discovered. This documentation is stored at the HMB in the operating record. Unacceptable conditions include leaking or open containers, spill to containment, cracks in concrete flooring or containment system greater than 0.01-inch, damage to floor coating, and spill control equipment missing.

BPA Ross supplements their visual inspections for leaks with an automatic leak detection system in all dangerous waste storage areas within the HMB. The system is designed and operated to detect liquids released from containers. If the system detects liquid in secondary containment, it activates an alarm to alert the on-site security guard. The guard will then notify trained HMB personnel to respond.

Emergency Planning ([Chapter 173-303-350 WAC](#))

The permit includes a formal contingency plan HMB personnel must follow in the case of an emergency at the HMB. The plan includes specific procedures for responding to different types of emergencies, such as explosions, fires, spills, or releases. The permit also specifies emergency equipment and supplies BPA Ross must keep in the HMB at all times to respond to potential emergencies.

The permit clearly specifies criteria for incidents that must be immediately reported to Ecology. It also has criteria for incidents that require implementation of contingency plan procedures. If the facility implements the contingency plan, they must provide a written report to Ecology within 15 days. The report must describe the incident, explain its causes, describe emergency responses, assess environmental damage, and list steps taken to prevent recurrence. BPA Ross must also notify Ecology to report incidents of noncompliance with the permit. If the noncompliance could threaten human health or the environment, BPA Ross must notify Ecology immediately. For other noncompliance, the facility must notify Ecology in their next monitoring report but no later than six (6) months after the incident.

The permit identifies a trained emergency coordinator who is thoroughly familiar with all aspects of the facility's contingency plan, required by Chapter 173-303-350(2) WAC, who directs emergency response procedures. The person assigned as an emergency coordinator must meet qualifications and be trained according to the requirements outlined in the permit (Chapter 173-303-360 WAC). The emergency coordinator is authorized to use BPA funds that are needed to respond to any emergency. The permit also specifies an alternate emergency coordinator in case the primary person is not available to assume the responsibility and duties.

A new requirement for this draft permit is a quick reference guide with specific elements that are critical to local responders when an emergency has occurred at the HMB. This is an enhancement to BPA Ross's contingency plan.

BPA Ross is required to establish coordination agreements with local emergency response providers and with state and local emergency response teams. BPA Ross listed the following groups within their contingency plan and can request assistance from these groups in an emergency:

- Vancouver Fire Department
- Vancouver Police Department
- Legacy Salmon Creek Medical Center
- Southwest Washington Medical Center
- Washington State Department of Ecology
- Clark County Department of Emergency Services
- Private clean-up contractors: Clean Harbors, Cowlitz Clean Sweep, NWFF, and Republic Services (US Ecology)

BPA Ross Complex has an overarching contingency plan for emergency response within the entire complex which is not included in this permit. The HMB emergency plan is a subsection of

this overarching emergency response plan which specifically covers dangerous waste material and the permitted area of the HMB building. This plan can be activated independently of the overarching contingency plan, or as part of a larger response. However, they will not use the contingency plan in this permit unless the emergency threatens to affect the dangerous waste management operations at the HMB.

Upon review of this draft permit, Ecology determined that containment of fire suppression water in the office space was inadequate for that particular part of the building. BPA Ross updated their HMB emergency procedures to include spill prevention equipment available in the office space to contain any fire suppression water from entering the office space. Also, internal training on emergency procedures for office personnel.

Training ([Chapter 173-303-330 WAC](#))

The permit requires BPA Ross to conduct comprehensive training for personnel involved with dangerous waste management. Training includes the following general topics:

- Health and safety
- HMB operations
- Permit and other regulatory requirements
- Emergency procedures
- Job-specific training

Two examples of job-specific training include HMB inspection requirements and dangerous waste container management.

The training program includes general training and job-specific training for new personnel and personnel doing new duties. BPA Ross must ensure an experienced, trained person supervises new personnel until completion of their new employee/position training. This initial training must be completed within the first six months of employment (or transfer to new duties). Refresher training occurs annually and includes a combination of formal courses and **on-the-job training** (OJT). OJT can include meetings, hands-on demonstrations, working under the guidance of a trained mentor, and review of written material such as operating procedures.

The purpose of OJT is to ensure personnel use required dangerous waste management procedures and to provide location-specific, task-specific, hands-on training to supplement classroom training. The **HMB Manager** is responsible for ensuring that OJT is conducted as required and for making the final determination that personnel working at the HMB have successfully completed all required training.

Corrective Action (Hazardous/Dangerous Waste Clean Up) ([Chapter 173-303-645](#), [-646](#), and [-64610](#) through [-646920 WAC](#))

Ecology requires environmental cleanup at permitted dangerous waste management facilities resulting from past activities causing dangerous waste or dangerous constituent releases to the environment. These types of facilities may have had unacceptable levels of contamination in environmental media, such as soil, ground water, and surface water. These clean-up activities are referred to as “**corrective action**.” Ecology is authorized to require facilities to perform corrective action (chapter 173-303-645, -64610 through -64690 WAC). Requirements for corrective action are part of this dangerous waste permit. Ecology uses the procedures and standards found in the state cleanup law, **Model Toxics Control Act** (MTCA, chapter 70A.305 RCW), to require facilities to conduct environmental cleanups. EPA requires federal facilities conduct environmental cleanup

under the **Comprehensive Environmental Response, Compensation, and Liability Act** (CERCLA, commonly called “Superfund”).

BPA has performed a significant amount of environmental cleanup under CERCLA at the Ross Complex in coordination with EPA and Ecology. BPA have completed contaminant removal and construction needed to address and monitor environmental contamination as determined by **Record of Decisions** (RODs) under CERCLA. BPAs cleanup obligations involve maintenance and monitoring of previously installed systems. Additional remediation will be required at the time of closure or if any below groundwater is proposed in areas where contamination has remained in place.

Corrective action requirements in this draft permit incorporate ongoing CERCLA clean-up efforts by reference. This approach avoids duplication of effort by different state and federal programs having the same objectives.

Cleanup Activities Conducted Under CERCLA (42 U.S.C. Chapter 103)

BPA has operated the Ross Complex since 1939. Their past activities, including disposing of dangerous waste on-site, resulted in soil and groundwater contamination.

- **1987–1988**
 - BPA discovered that groundwater beneath part of the Ross Complex was contaminated.
- **1989**
 - EPA listed the Ross Complex as a CERCLA Superfund Site due to **volatile organic compounds** (VOCs) in groundwater near the City of Vancouver drinking water supply.
- **1990**
 - EPA divided the property into two cleanup areas—Area A and Area B—to better evaluate contamination and potential remedies.
- **1991**
 - BPA completed a **Remedial Investigation (RI)** and **Feasibility Study (FS)** to determine the extent of contamination and evaluate cleanup options.
 - Under Washington’s MTCA, BPA removed contaminated soils at seven localized areas around the property.
- **1993**
 - EPA issued two RODs under CERCLA outlining cleanup actions, including soil excavation and treatment, capping, institutional controls, and groundwater monitoring.
 - EPA conducted a **Remedial Facility Assessment (RFA)** under RCRA authority and recommended no additional action beyond Superfund requirements, except for one area involving a leaking drum discovered during a 1987 TSCA inspection.
- **1995**
 - EPA inspected the Ross Complex and determined the remedial actions were successful.
- **1996**
 - EPA formally deleted the Ross Complex from the CERCLA Superfund Site list.
 - BPA closed four dangerous waste management operations, all achieving clean closure under RCRA.
- **1997**
 - BPA decommissioned 20 groundwater monitoring wells.

- Thirteen groundwater monitoring wells remained in place and are maintained indefinitely.
- **1999**
 - EPA issued the first five-year review under CERCLA.
 - The review determined groundwater monitoring was no longer necessary due to low contaminant levels and no interaction between upper and lower aquifers.
 - The review recommended strengthening and formalizing **institutional controls**, including mapping waste units, dig permits, placards, EPA notifications, inspections, and reporting requirements.
- **2001**
 - EPA issued an **Explanation of Significant Difference (ESD)** to clarify and modify previous RODs.
 - The ESD established detailed institutional control requirements consistent with the 1999 five-year review.
 - The ESD was incorporated into the dangerous waste permit, giving Ecology authority to enforce its conditions.
- **2004**
 - BPA submitted the second five-year review, focusing on institutional controls in several specific areas.
 - The review concluded that remedies were functioning as designed and were protective of human health and the environment.
 - Continued institutional controls and quarterly inspections were recommended.
- **2009**
 - The third five-year review recommended continued implementation of institutional controls and quarterly inspections.
 - It concluded no additional action was needed.
- **2014**
 - The fourth five-year review recommended continued institutional controls.
 - No site condition changes affecting remedy protectiveness were identified.
- **2019**
 - The fifth five-year review confirmed that remedies remained protective and institutional controls remained effective.
- **2024**
 - The sixth five-year review concluded that remedies and institutional controls remain protective.
 - EPA recommended continued institutional controls and quarterly inspections.
 - A draft dangerous waste management permit established conditions for ongoing corrective action, including:
 - Incorporating cleanup requirements from the 2001 ESD into dangerous waste corrective action requirements.
 - Ecology review of future five-year reviews.
 - Notification to Ecology of newly identified contamination or releases.
 - Use of permit modifications if additional corrective action is required.
- **2029**
 - The next five-year review process expected.

Partial Closure

“Closure” is the term used in the Dangerous Waste Regulations to refer to the process of taking a unit out of service and properly cleaning up or decontaminating the unit and any areas affected by releases from the unit. When this process is finished, a unit is referred to as “closed.” When

closure is being carried out, a unit is referred to as “closing” or “in closure”. Closures are carried out on a unit-by-unit basis. Partial closure will follow the approved permit requirements for the closing unit. This means a dangerous waste facility might have operating units, closed units, and closing units all at the same time. Closures that occur at facilities where other dangerous waste units continue to operate are referred to as “partial closures.” BPA Ross is required to follow closure standards in the event of contamination to a unit or unit replacement.

Closure ([Chapter 173-303-610 WAC](#))

BPA Ross must meet final closure standards when a decision is made to stop using the HMB for dangerous waste management and storage. BPA Ross must notify Ecology by letter at least 45 days before final closure activities will begin. Closure involves removing all dangerous waste from the building and decontaminating or removing all equipment, structures, and contaminated environmental media (for example, soil) that contacted dangerous wastes. If this cannot be accomplished, the contaminated location(s) will be subject to corrective action requirements.

The permit sets detailed step-by-step procedures that BPA Ross must follow for closure. First, BPA Ross must remove all dangerous waste from container management areas. BPA Ross will ship these dangerous wastes to another permitted TSD facility.

BPA Ross will decontaminate the HMB using high pressure washing of concrete and metal surfaces. The wash water from the decontamination process will be designated and disposed of according to waste verification procedures. A representative sample will be obtained and analyzed to determine if residual contamination remains. Before additional decontamination is carried out, the horizontal and vertical extent of the residual contamination will be determined through chip or core sampling of the concrete. If the concrete surfaces still contain residual contamination above clean-closure levels specified in the closure regulations (chapter 173-303-610(2) WAC) and the permit, then BPA Ross must perform focused decontamination procedures using alternative treatment standards as specified in 40 CFR 268.45, Table 1.

After decontaminating the HMB, BPA Ross will sample soil beneath the building to determine whether any contamination from HMB operations have entered the soil. Representative soil sampling will be performed according to the Sample and Analysis Plan in the permit, at:

Locations where constituents were detected in concrete chip samples above the cleanup level.

Random locations within each secondary containment “unit” or room within the permitted unit at a minimum of one sample for every 3,000 square feet.

- The mid-point or lowest point of each containment sump.
- The mid-point or lowest point of each trench.
- Any location where documented floor damage such as significant cracks exists or has been repaired.
- Any area where a significant spill resulted in deterioration of the floor coating.

The permit includes general sampling and analytical procedures, minimum number of sampling locations, criteria for selecting additional sampling locations, and minimum laboratory analyses.

BPA Ross and Ecology will compare results to the established MTCA cleanup standards for unrestricted site use. If all results fall below these cleanup standards, the HMB qualifies for closure. If results fail to meet MTCA clean-up standards, BPA Ross will need to remove or decontaminate the soils to achieve acceptable soil contamination levels at or below MTCA standards.

BPA Ross must submit an updated Sampling and Analysis Plan for review at least 60 days before closure begins. This updated plan will be submitted and approved through the permit modification process outlined in chapter 173-303-800 through 173-303-840 WAC. Certain information needed to develop the final detailed sampling and analysis plan, including current analytical procedures and up-to-date HMB operating history, will not be available until then. An independent qualified professional engineer will observe and document closure activities. The engineer will write a report of observations and certify whether BPA Ross followed procedures in the permit while conducting closure as required by chapter 173-303-610(11) WAC.

BPA Ross does not plan to close the HMB within the next 10 years, therefore the permit does not include a plan for post-closure care.

Financial Assurance ([Chapter 173-303-620 WAC](#))

BPA is a federal agency, therefore, it does not need to provide assurance that it has finances available to conduct a complete closure of the facility. However, BPA Ross has estimated its closure cost so that amount can be placed in their budget for closing the HMB. BPA Ross is required per chapter 173-303-620(3)(c) WAC to adjust closure cost estimates for inflation annually. This cost estimate must be maintained at the facility.

BPA Ross is exempt from having liability insurance specified in chapter 173-303 WAC. Therefore, the permit does not contain financial assurance mechanisms for either closure or liability coverage.

Recordkeeping ([Chapter 173-303-210](#), and [-380 WAC](#))

The HMB must maintain detailed operating records. These records document compliance with conditions of the permit and the dangerous waste regulations. The HMB must also maintain records of spills, releases, incidents of noncompliance, and emergencies. These records must be kept for periods ranging from three years to when HMB closure is completed, depending on the type of record. The permit lists specific recordkeeping requirements.

Reporting Requirements ([Chapter 173-303-390 WAC](#))

BPA Ross is required to report to Ecology the following:

- When incidents cause the facility to implement its contingency plan.
- A waste shipment received that does not agree with the accompanied manifest or shipping paper and if the discrepancy is not resolved within 20 days, BPA Ross is required to report to Ecology the waste discrepancy.
- Annual report on the HMB's operations, including waste minimization efforts.

This list provides examples of the types of reports required. It does not include all reports BPA Ross must submit to Ecology.

Permit Modifications ([Chapter 173-303-830 WAC](#))

BPA Ross or Ecology can modify the permit at any time. Certain permit modifications are subject to public review. Chapter 173-303-830 WAC provides procedures for modifying a permit and presents the types of permit changes that are subject to public review and comment.

Changes to RCRA/RCRA Rules under the Hazardous and Solid Waste Amendments

In general, new or amended requirements in the Hazardous and Solid Waste Amendments of 1984 and related regulations will automatically apply to BPA Ross's dangerous waste management activities. The exception is new requirements that are less stringent than those in effect when Ecology issues the final permit.

Conclusion

In its permit application, BPA Ross has demonstrated it is capable of safely operating its dangerous waste management facility under the conditions required for a final permit. Therefore, Ecology has made a tentative decision to re-issue a final status permit to the facility.

Appendix A: Public Involvement Participation ([Chapter 173-303-900 WAC](#))

Public Comment Period

Ecology invites public comment on the draft BPA Ross Complex permit and related documents from 12:00 a.m. on October 5, 2026, until 11:59 p.m. on November 18, 2026. Written comments must be postmarked or emailed no later than 11:59 p.m. on November 18, 2026.

How to Participate

Ecology welcomes all comments on the draft permit, especially those that address the provisions Ecology has proposed to revise. In order for Ecology to adequately address comments, please include the following information with each comment:

- Provide specific permit language on which you are commenting, along with the page number(s) of where the language can be found.
- A brief, concise basis for the comment, including but not limited to the administrative, legal, technical, or other foundation for the comment.
- Reference any of the following topics if possible: technical issues, accuracy and completeness of information, scope of proposed coverage, adequacy of environmental protection and permit conditions, any other concern that would result from issuance of this draft permit.
- Suggest permit language or conceptual alternative. You may submit written comments or oral comments. There is no need to provide your comments both in writing and orally. The format in which you submit comments does not matter, all comments receive equal consideration.

Send written comments to Ecology using the contact address listed below by the end of the comment period. For further information about the public review process, please refer to the following regulation: WAC 173-303-840(3) through (9).

Washington State Department of Ecology
Attn: Renae Z'berg, HWTR
PO Box 47600
Olympia, WA 98504-7600
Phone: (360) 999-3493
E-mail: renae.zberg@ecy.wa.gov

Southwest Region Office
Hazardous Waste and Toxic Reduction
300 Desmond Drive
Lacey, Washington 98503
Phone: (360) 407-6700

Public Hearing & Informational Session

An informational session will be held at 4:30 p.m., followed by a public hearing starting at 5:00 p.m. on November 5, 2026, at the Vancouver Community Library, located at 901 C St. in Vancouver.

We will collect oral comments during the public hearing as part of our public input process. You may also submit written (hard copy and electronic) comments during the comment period. Written comments are given the same weight and consideration as oral comments.

Public notice regarding the hearing will be circulated at least thirty (30) days in advance of the hearing through mail, social media, and the Ecology website.

Permit Issuance

Final decision

After considering public comments and testimony, Ecology will make a final permit decision on whether to reissue this permit. If Ecology reissues this permit, it will be valid for ten years from its effective date. Ecology will inform BPA Ross and all people who comment during the public comment period of the final permit decision.

Effective date of permit

Normally, a permit is effective 30 days after issuance or reissuance. However, if there are no comments on the draft permit, Ecology may specify an earlier effective date for the final permit.

Appealing the final permit decision

The appeal of Ecology actions and the process of appeals is governed by:

- Chapter 173-303-845 WAC
- Chapter 43.21B RCW
- Chapter 371-08 WAC

You have the right to appeal the final permit decision to the ***Pollution Control Hearings Board*** (PCHB) within 30 days of notification that Ecology has issued the permit. Your appeal documents **must be received before 5:00 PM on the close of the appeal period**. You may appeal only by filing in writing to the PCHB and Ecology. Send a copy of your appeal documents to Ecology by mail, in person, or by email (see addresses below). For the most current information regarding filing with the PCHB, visit: <https://eluhho.wa.gov/> or call: 360-664-9160.

Your appeal filing addresses for Department of Ecology

In Person:

Department of Ecology

Attn: Appeals Processing Desk
300 Desmond Drive Southeast
Lacey, WA 98503

By Mail:

Department of Ecology

Attn: Appeals Processing Desk
PO Box 47608
Olympia, WA. 98504-7608

Email: ecologyappeals@ecy.wa.gov

Appendix B: Glossary / Acronyms

Director – The Director of the Washington Department of Ecology or his/her authorized representative.

Central Accumulation Areas (CAA) – any on-site dangerous waste accumulation area subject to chapter 173-303-200 WAC. Commonly referred to by their storage time limit as “90 day storage area”.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, commonly called “Superfund”) – a federal law (42 U.S.C. Chapter 103) enacted by the President to address the cleanup of hazardous waste sites. Allows for response to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes a trust fund, financed by taxes on chemical and petroleum industries, to provide the federal government with the resources needed for cleanup efforts. The act also holds responsible parties liable for cleanup costs, ensuring that those responsible for contamination are accountable for their actions.

Corrective Action – the environmental cleanup program for dangerous waste treatment, storage, and disposal facilities (TSDF). A federal program delegated by EPA to WA. State Department of Ecology. Ecology uses CERCLA, MTCA, cleanup procedures and requirements to implement corrective action.

Designation - is the process of determining whether a waste is regulated under the dangerous waste lists, chapter [173-303-080](#) through [173-303-082](#) WAC; or characteristics, chapter [173-303-090](#) WAC; or criteria, chapter [173-303-100](#) WAC. The procedures for designating wastes are in chapter [173-303-070](#) WAC. A waste that has been designated as a dangerous waste may be either dangerous waste (DW) or extremely hazardous waste (EHW).

Episodic event ([Chapter 173-303-173 WAC](#)) – an activity or activities, either planned or unplanned, that does not normally occur during generator operations, resulting in an increase in the generation of dangerous wastes that exceeds the calendar month quantity exclusion limits for the generator's usual category.

Explanation of Significant Difference (ESD) – a document issued by EPA that describes significant changes made to the Record of Decision (ROD) after the ROD has been signed. The ESD summarizes the information that led to the changes and affirms that the revised remedy complies with the statutory requirements of CERCLA.

Feasibility Study (FS) – conducted by EPA as part of a remedial investigation process. The study assesses site conditions, evaluates potential remedial actions, and determines the nature of the waste to ensure effective cleanup. Involves data collection, risk assessment, and analysis of alternatives to select the most appropriate remedial actions for addressing contamination and minimizing risks to human health and the environment.

HMB Manager – BPA Ross’s Hazardous and Toxic Materials Handling Building Manager responsibility for regulatory compliance at the HMB who has been trained in emergency response and dangerous waste management.

Identified Waste Streams Handbook (IWS) – a comprehensive online guidance manual that

provides an overview of the management of dangerous waste for BPA Ross. Organized into three volumes: (1) IWS descriptions that include a solid waste determination and dangerous waste characterization for waste streams that are routinely generated by BPA on a regular basis; Waste Minimization; Sampling Protocols; Packaging; Labeling; Used Oil Management; Accumulation/Storage; Manifesting/Tracking; Transportation; and Land Disposal Restrictions. (2) IWS Kits for BPA Ross's most common waste streams that includes a waste stream description; packaging, labeling, storage, and shipping requirements; and links to chemical waste profiles for each IWS. (3) Waste profiles that include analytical results and safety data sheet documentation that satisfies record keeping requirements for dangerous waste generators.

Knowledge - means sufficient information about a waste to reliably substitute for direct testing of the waste. To be sufficient and reliable, the "knowledge" used must provide information necessary to manage the waste in accordance chapter 173-303 WAC. "Knowledge" may be used by itself or in combination with testing to designate a waste pursuant to chapter [173-303-070\(3\)\(e\)](#) WAC, or to obtain a detailed chemical, physical, and/or biological analysis of a waste as required in chapter [173-303-300\(2\)](#) WAC.

Independent qualified registered professional engineer - means a person who is licensed by the state of Washington, or a state which has reciprocity with the state of Washington as defined in RCW [18.43.100](#), and who is not an employee of the owner or operator of the facility for which construction or modification certification is required. A qualified professional engineer is an engineer with expertise in the specific area for which a certification is given.

Manifest (eManifest)- EPA Form 8700-22 (including, if necessary, EPA Form 8700-22A), or the electronic manifest originated and signed by the generator or offeror in accordance with the requirements of chapter [173-303-180](#) WAC (Manifest), and the applicable requirements of chapter [173-303-170](#) through [173-303-692](#) WAC.

Manifest tracking number - means the alphanumeric identification number (a unique three letter suffix preceded by nine numerical digits), that is preprinted in Item 4 of the Manifest by a registered source.

Mineral oil dielectric fluid (MODF) – a type of dielectric fluid that is primarily composed of refined mineral oils and used for electrical insulation and cooling treatments. Known to have flammability characteristics and toxic environmental impacts.

Model Toxics Control Act (MTCA, chapter 70A.305 RCW) – establishes administrative processes and standards for identifying, investigating and cleaning up sites contaminated with hazardous substances. The act grants Ecology's Toxic Cleanup Program the responsibility for implementation and enforcement of MTCA, development of rules, policies, and guidance, and oversee most cleanups in Washington state.

Permit – an authorization which allows a person to perform dangerous waste transfer, storage, treatment, or disposal operations, and which typically will include specific conditions for such facility operations issued by the director of Ecology.

Polychlorinated biphenyl (PCBs) – a group of 209 human-made compounds that generally occur in complex mixtures. PCBs are persistent, toxic, and bioaccumulative. Produced for commercial uses from about 1929 until their ban under the 1976 TSCA act. Used mostly in heat-transfer fluids, in electrical transformers and capacitors, but also plasticizers, wax and pesticide extenders, lubricants,

and caulk used to seal cracks in buildings. In 2024, Washington petitioned the EPA to initiate rulemaking to protect public health against PCBs in consumer products.

Record of Decisions (RODs) – a formal public document that explains the decision made regarding a specific action in context with CERCLA site cleanup. Created by the EPA, it includes a brief description of the proposed action and alternatives considered along with environmental factors and project impacts.

Remedial Facility Assessment (RFA) – identifies solid waste management units (SWMU) which are subject or suspected to be source of releases in the environment. EPAs' goal for the RFA is to determine the nature and extent of releases of hazardous wastes or hazardous constituents from regulated units, SWMU, and other source areas at the facility, and to gather all necessary site-specific data.

Remedial Investigation (RI) (chapter 173-340-350 WAC) – an “investigation is conducted under chapter 173-340-350 WAC to identify the sources of contamination; to characterize the nature, extent, and magnitude of contamination; and to assess the threats posed by the contamination to human health and the environment. The results of the investigation are used to establish cleanup standards and to develop and evaluate cleanup action alternatives in a feasibility study” (chapter 173-340-120(6) WAC).

Representative Sample – means a sample of a universe or whole (e.g. waste pile, lagoon, ground water) which can be expected to exhibit the average properties of the universe or whole. (40 CFR 260.10) The approved equivalent methods and equipment used for obtaining representative samples of a waste as outlined in chapter 173-303-110 WAC.

SEPA (State Environmental Policy Act) - The Washington State Law, RCW 43.21C.020, intended to prevent or eliminate damage to the environment. (chapter 197-11 WAC)

Significant expansion (chapter 173-303-282(3) WAC) is a single or cumulative increase of greater than twenty-five percent of the storage design capacity as described in the facility's original Part A permit application, or of the storage capacity approved for the previous significant expansion, whichever is more recent. Also, any change that would qualify as a class 3 permit modification under chapter 173-303-830(4) WAC. (chapter 173-303-281(4)(a) WAC).

Solid waste management unit (SWMU) - means any discernible location at a facility, as defined for the purposes of corrective action, where solid wastes have been placed at any time, irrespective of whether the location was intended for the management of solid or dangerous waste. Such locations include any area at a facility at which solid wastes, including spills, have been routinely and systematically released. Such units include regulated units as defined by chapter 173-303 WAC.

Treatment - means the physical, chemical, or biological processing of dangerous waste to make such wastes nondangerous or less dangerous, safer for transport, amenable for energy or material resource recovery, amenable for storage, or reduced in volume, with the exception of compacting, repackaging, and sorting as allowed under chapter [173-303-400](#)(2) and [173-303-600](#)(3) WAC.

Toxic Substances Control Act (TSCA) (15 U.S.C. §2601 et seq. (1976)) – This act provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. TSCA addresses the production, importation, use, and disposal of specific chemicals not covered by other federal regulations such as PCBs, asbestos,

radon, and lead-based paint.

Universal waste - means any of the following dangerous wastes that are subject to the universal waste requirements of chapter [173-303-573](#) WAC: Batteries as described in chapter [173-303-573](#)(2) WAC; Mercury-containing equipment as described in chapter [173-303-573](#)(3) WAC; and Lamps as described in chapter [173-303-573](#)(5) WAC.

Volatile organic compounds (VOCs) – organic compounds that have a high vapor pressure and low water solubility. They are commonly found in paints, petroleum fuels, hydraulic fluids, paint thinner, and dry-cleaning agents. VOCs are regulated to minimize their impacts on air quality and human health.

Acronyms

ADA – Americans with Disabilities Act

BPA – Bonneville Power Administration

BPA Ross – Bonneville Power Administration Ross Complex

CAA – Central Accumulation Areas

CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act (42 U.S.C. Chapter 103), commonly known as Superfund

Ecology – Washington State Department of Ecology

EPA / USEPA – United States Environmental Protection Agency

ESD – Explanation of Significant Difference

FS – Feasibility Study

HMB – Hazardous Materials Building

IWS – Identified Waste Streams

MODF – Mineral Oil Dielectric Fluid

MTCA – Model Toxics Control Act (chapter 70A.305 RCW)

PCHB – Pollution Control Hearings Board

PCB – Polychlorinated Biphenyls

ppm – Parts Per Million

RCRA – Resource Conservation and Recovery Act

RCW – Revised Code of Washington

RFA – Remedial Facility Assessment

RI – Remedial Investigation

ROD – Records of Decision

SEPA – State Environmental Policy Act (chapter 197-11 WAC)

TSD – Treatment, Storage, and Disposal

TSCA – Toxic Substances Control Act (15 U.S.C. § 2601 et seq. (1976))

VOC – Volatile Organic Compounds

WAC – Washington Administrative Code