



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

November 20, 2019

Eric Crowell
Community Development
City of Yakima
129 North 2nd Street
Yakima, WA 98901

Re: SEPA#035-19

Dear Eric Crowell:

Thank you for the opportunity to comment during the optional determination of nonsignificance process for the demolition of Apple Valley Elementary School, proposed by West Valley School District. We have reviewed the documents and have the following comments.

HAZARDOUS WASTE & TOXIC REDUCTION

The Environmental Checklist indicates lead-containing materials are present. If the structure or its lead-bearing components designate as dangerous waste under Chapter 173-303 Washington Administrative Code, all related debris must be managed appropriately and cannot be disposed of as municipal trash. Additional information on lead in dangerous waste is available on the Department of Ecology website: <http://www.ecy.wa.gov/programs/hwtr/dangermat/lead.html> .

Mercury-containing fluorescent lamps that designate as dangerous waste may be managed as dangerous waste or universal waste under Washington Administrative Code 173-303-573. For more information, refer to Ecology's publication Universal Waste Rule for Lamps: <https://fortress.wa.gov/ecy/publications/summarypages/98407c.html> .

The "Mercury-Containing Lights - Proper Disposal" law, Chapter 70.275 RCW, requires that all persons, residents, government, commercial, industrial, and retail facilities and office buildings must recycle their end-of-life mercury-containing lights. This includes mercury-containing lamps that do not designate as dangerous waste, often called "green tip" lights. Although green tip lights may pass dangerous waste testing, they still contain mercury. Disposal to landfills is prohibited for all mercury-containing lights.

Some of the other building materials that can pose a risk to human health and the environment if not managed separately can include:

- Electronic equipment
- Self-luminous exit signs
- Mercury switches in light switches or thermostats
- Batteries from emergency lights, exit signs, security systems, and alarms
- Lighting ballasts
- PCB caulking
- Refrigerants from air conditioning systems (this was addressed in the checklist)



Eric Crowell
November 20, 2019
Page 2

- Asbestos (this was addressed in checklist)

For compliance assistance, please contact **Tami Applebee**, Dangerous Waste Inspector, at 509-457-7147 or tami.applebee@ecy.wa.gov.

TOXICS CLEAN-UP

The facility addressed in this proposal is on Ecology's Hazardous Site List, Ecology Facility/Site ID # 3464749, TCP Cleanup Site ID # 882. The Site is ranked 3. Hazardous substances may be present at the site in amounts and/or concentrations likely to affect human health or the environment. Site cleanup may be required in the future by Ecology under the Model Toxics Control Act. Site characterization and/or cleanup may be desirable prior to site alteration or development.

If you have any questions or would like to respond to these Toxics Clean-up comments, please contact **Valerie Bound** at 509-454-7886 or email at valerie.bound@ecy.wa.gov.

WATER QUALITY

Project with Potential to Discharge Off-Site

If the project anticipates disturbing ground with the potential for stormwater discharge off-site, the NPDES Construction Stormwater General Permit is recommended. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit may take 38-60 days.

The permit requires that a Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) shall be prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water and storm drains by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading, or construction.

In the event that an unpermitted Stormwater discharge does occur off-site, it is a violation of Chapter 90.48 RCW, Water Pollution Control and is subject to enforcement action.

More information on the stormwater program may be found on Ecology's stormwater website at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/>. Please submit an application or contact **Lloyd Stevens, Jr.** at the Dept. of Ecology, 509-574-3991, with questions about this permit.

Sincerely,



Gwen Clear
Environmental Review Coordinator
Central Regional Office
509-575-2012
crosepa@ecy.wa.gov