

Focus on: Cleanup of Small Spills to Soil



What is a small spill cleanup?

Small-scale spills of hazardous substances to soil require minimal excavation and tend not to extend onto other properties or impact media like surface water, groundwater, or sediment. Excavation of contaminated soil is a permanent and relatively quick cleanup method that can often be completed before the Department of Ecology (Ecology) completes an Initial Investigation. Cleanups involving other media are more complex and usually cannot be completed quickly.

What is an Initial Investigation?

Within 90 days after receiving a report of a suspected or confirmed environmental spill, Ecology conducts an Initial Investigation to determine whether further action is needed to investigate or clean up the spill under the state's [Model Toxics Control Act](#) (MTCA).¹ Ecology typically does not review cleanups of heating oil tank releases. For those, work directly with the [Pollution Liability Insurance Agency](#) (PLIA).²

Benefits of a quick cleanup

If you finish your soil cleanup before we complete our Initial Investigation, we will review your cleanup for no fee. Also, if we determine no further action is needed to meet MTCA cleanup standards, your property will

avoid placement on the [Confirmed and Suspected Contaminated Sites List](#) (CSCSL).³

A CSCSL listing may affect a property's value and make property transactions more challenging. To remove a site from the CSCSL usually requires review of your cleanup through enrollment in a fee-based [technical assistance program](#).⁴

Note: The following sections list the **minimum** needs for cleanup actions, documentation, and Ecology review criteria. Additional actions or information may be needed, depending on the specific details of the spill. Ecology will work with you to determine what those are.

Required steps for cleanup

For an excavation to meet MTCA cleanup standards, it must include at least the following actions.

- Remove all visibly contaminated soil. Use field-detection equipment, if available, to help identify the area to excavate.
- Safely transport contaminated soil to a permitted disposal facility, and maintain disposal receipts. Contact your county's [local health department or district](#)⁵ to identify an appropriate disposal facility, based on hazardous substance concentrations.
- Collect enough soil samples from the outer edges and/or bottom of the excavated area to comply with MTCA cleanup standards. The number of samples needed depends on the excavated area size.
- Analyze the soil samples at an [Ecology-accredited analytical laboratory](#)⁶ for chemicals likely to be present.

Documentation we need

You need to provide us with at least the following information for us to evaluate your cleanup. We will notify you if more information is needed.

- Prepare a sampling figure showing the spill area and sampling locations with sample IDs (use the same sample IDs on all documentation).

Toxics Cleanup Program

- Include photos taken at the time of the spill, during cleanup, and after cleanup (if available).
- Provide a color aerial image of the property showing the location of each spill area (if the sampling figure does not include one).
- Summarize in a table the sample information, including sample IDs, collection dates and depths, and chemical concentrations.
- Note the depth to groundwater in or near the spill area (if known).
- Provide a copy of the analytical laboratory report, including QA/QC data and complete chain-of-custody documentation.
- Include disposal receipts and manifests (if applicable).

Ecology's review process

Once we receive your cleanup information, usually in the form of a report, our Initial Investigator will review it to determine whether no further action is needed to clean up a spill. The Initial Investigator needs to determine that, at a minimum, the following criteria are met.

- An adequate number of samples were collected, and analytical results indicate no remaining soil contamination greater than applicable MTCA cleanup levels.
- Soil contamination does not pose a threat to groundwater, surface water, sediment, or air quality.

If your cleanup does not meet these criteria, we will likely place the property on the CSCSL for additional

investigation and assessment using the [MTCA cleanup process](#).⁷ Cleanups where the selected remedy includes institutional controls (e.g., soil containment) cannot receive a no further action determination from an Initial Investigation.

Hiring environmental professionals

We advise hiring a qualified and experienced professional environmental consultant or cleanup contractor to perform the cleanup and confirm compliance with MTCA cleanup standards. A contract for this work should include all activities and documentation listed above. Our [general guidance](#)⁸ provides information on selecting a consultant or contractor.

Working with us

We recommend having open communications with the Initial Investigator assigned to your incident to learn if any additional site-specific steps are needed to complete or document your cleanup. MTCA allows some flexibility in the length of the Initial Investigation review period.

Contact information

Eileen.Webb@ecy.wa.gov
(360) 763-2305

ADA accessibility

To request ADA accommodation, contact our ADA Coordinator at 360-407-6831, email us at EcyADACoordinator@ecy.wa.gov, or visit ecology.wa.gov/accessibility. For Relay Service or TTY call 711 or 877-833-6341.

¹ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Rules-directing-our-cleanup-work/Model-Toxics-Control-Act>

² <https://plia.wa.gov/>

³ <https://apps.ecology.wa.gov/cleanupsearch/reports/cleanup/contaminated>

⁴ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process/Cleanup-options>

⁵ <https://www.doh.wa.gov/AboutUs/PublicHealthSystem/LocalHealthJurisdictions>

⁶ <https://apps.ecology.wa.gov/laboratorysearch/Default.aspx>

⁷ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-process>

⁸ <https://apps.ecology.wa.gov/publications/documents/ftcp92116.pdf>