



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

February 8, 2024

Zach Torrance-Smith
Kittitas County Planner I
411 N. Ruby St. Suite 2
Ellensburg WA 98926

RE: PF-24-00001

Dear Zach Torrance-Smith:

Thank you for the opportunity to comment on the Notice of Application for the WSDOT Bullfrog Maintenance Facility. The Department of Ecology (Ecology) has reviewed the application and has the following comments.

SPILLS Program

The Spill Prevention, Preparedness, and Response Program at Ecology would like to submit the below comments and questions to consider on the project.

- Due to the volume of oil stored onsite, a SPCC plan is probably required (40 CFR 112.7) if one has not been written already. Please refer to those regulations for any requirements that need to be met in order to have aboveground storage tanks.
- Is the fuel line to the dispenser double walled? If not, WSDOT may consider using double walled piping to allow any leaks to leak from the damaged fuel line into of the sumps for easier detection by onsite staff.
- Are the storage tanks double walled? What type of interspatial leak detection do these tanks have?

Please contact Angela Zeigenfuse, Project Specialist with the Spills Program, at 360-480-2263 or angela.zeigenfuse@ecy.wa.gov for questions.

Toxics Cleanup

A notice of intent to permanently close tanks must be filed with Ecology at least 30 days prior to closure. The closure must be completed within 30 days prior to closure. The closure must be complete within 60 days after expiration of the 30-day notice unless a written request for an extension is approved (Chapter 173-360A

WAC). <https://apps.ecology.wa.gov/publications/SummaryPages/ECY02095.html>

The on-site supervisor providing tank-closing services must be licensed by passing an exam administered by the International Code Council, or by another state with which Washington has a reciprocity agreement. Within 30 days after closing, a permanent closure checklist form must be provided to Ecology by the owner. The checklist must be signed by the certified supervisor that was on-site during the closure. <https://apps.ecology.wa.gov/publications/SummaryPages/ECY02094.html>

A site assessment to determine whether contamination has occurred must be completed by a qualified Site Assessor, as described in Chapter 173-360A WAC. These regulations provide minimum sampling requirements for contamination in the excavation area and in a published guidance document. This document, forms, and regulations are available online at <https://ecology.wa.gov/Regulations-Permits/Compliance-enforcement/Underground-Storage-Tank-closures>. Within 30 days after completion, a site assessment checklist must be submitted to Ecology.

If contamination of soil or groundwater is readily visible, or is revealed by sampling, Ecology must be notified within 24 hours by the owner and within 72 hours by the service providing supervisor. Contact the Environmental Report Tracking System Coordinator at the Central Regional Office at (509) 575-2490. Call the regional office for assistance and information about subsequent cleanup and to identify the type of testing that will be required.

If wastes generated at this site are designated as hazardous or dangerous waste pursuant to the Dangerous Waste Regulations, Chapter 173-303 WAC, and are generated in quantities sufficient to be regulated, the applicant must apply for a site identification number from Ecology by submitting a Notification of Dangerous Waste Activities form. The site identification number must be obtained prior to generating a regulated quantity of waste, prior to shipping wastes off-site for treatment, storage, or disposal.

Ecology requires the results of the site assessment be maintained for five years after completion of permanent closure or change-in-service. We recommend that the records be kept in the property file indefinitely for any future property owners to fulfill liability requirements under the Washington Model Toxics Control Act.

If storage tanks contain dangerous or hazardous wastes as defined in Chapter 173-303 WAC please contact Ecology's Central Regional Office, Hazardous Waste and Toxics Reduction Section, for closure requirements.

Under the Uniform Fire Code (UFC), other local permits may be required for the closure of underground storage tanks. The local official charged with administration of the UFC should be contacted regarding the permit requirements.

The submitted information does not state whether the fuel replacement system will include underground storage tanks. If underground storage tanks will be installed, the following comments apply to your project:

February 8, 2024

Page 3 of 3

Installation of new underground storage tanks must meet the requirements of the state underground storage tank regulations (Chapter 173-360A WAC). All new tanks and piping must have double-wall construction and be interstitially monitored for releases. Copies of these regulations and required forms are available from the Ecology by calling (360) 407-7270 or toll-free in state 1-800-826-7716. <http://app.leg.wa.gov/WAC/default.aspx?cite=173-360A>
<https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Underground-Storage-Tank-checklists-forms>

A notice of intent to install tanks must be filed with Ecology at least 30 days prior to installation. Within 30 days after coming into service, the tanks must be registered with the Department of Revenue's Business License Service on a state notification form. <https://dor.wa.gov/sites/default/files/2022-02/700041.pdf>
<https://apps.ecology.wa.gov/publications/SummaryPages/ECY02095.html>

The supervisor on-site during the installation must be licensed by passing an exam administered by the International Code Council. www.iccsafe.org

New tanks and any connected piping must be protected from corrosion by either a cathodic protection system, or by being constructed or coated with a non-corrosive material such as fiberglass. An acceptable method of leak detection must be employed, and the tanks must be equipped with spill prevention and overfill protection equipment.

Stage I vapor recovery equipment is required on all new gasoline dispensing facilities with a total gasoline nominal storage capacity greater than 10,000 gallons.

Other local permits may be required for the installation of underground storage tanks. Contact your local fire marshal and planning department to procure any permits required by county or other local jurisdictions.

If you have questions about Ecology's Underground Storage Tank Regulations, please contact Alex Ward at 509-504-5501 or alex.ward@ecy.wa.gov.

Sincerely,



Joy Espinoza
SEPA Coordinator
Central Regional Office
509-379-3967
crosepacoordinator@ecy.wa.gov

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