



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Northwest Region Office
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December 11, 2024

Ryan Harriman, Planning Manager
Community Planning & Development Department
City of Mercer Island
9611 SE 36th St
Mercer Island, WA 98040

Re: Town Center Long-Term Regional Transit Commuter Parking Project
File# SEP24-016, Ecology SEPA# 202404986

Dear Ryan Harriman:

Thank you for the opportunity to provide comments on the State Environmental Policy Act (SEPA) notice of application utilizing the optional determination of nonsignificance (ODNS/NOA) process for the Town Center Long-Term Regional Transit Commuter Parking Project. Based on review of the checklist associated with this project, the Department of Ecology (Ecology) has the following comments:

Ecology has reviewed files associated with and in the vicinity of the proposed project. The proposed project is located on a known contaminated site identified as CSID 11021 (<https://apps.ecology.wa.gov/cleanupsearch/site/11021>). Please incorporate the following Ecology comments into the SEPA Checklist:

Section A - 11

The project property is a listed contaminated site (Ecology CSID 11021). The proposal also includes removing contaminated surface soil (see Section B – Environmental Elements); therefore, Ecology strongly recommends working with an environmental professional to assist with regulatory compliance requirements, including interim cleanup activities (removal of contaminated soil), soil sampling, underground storage tank decommissioning (if needed), and reporting to Ecology.

Section B - 1(h)

The proposal includes the excavation of contaminated soil. If contaminated soil is to be temporarily stockpiled on the property, the stockpile will be underlain and covered with plastic sheeting, to prevent contact with uncontaminated soil and the generation of contaminated runoff from rainfall.

Section B - 7(a)

The project property (King County Parcel 5315101235) is the location of an Ecology Cleanup Site identified as CSID 11021 (<https://apps.ecology.wa.gov/cleanupsearch/site/11021>). The project property is also identified as a leaking underground storage tank site (LUST 2030). The property may also be affected by the adjacent property (King County Parcel 769844000), Ecology Cleanup Site CSID 4138 (<https://apps.ecology.wa.gov/cleanupsearch/site/4138>). There is a potential that contamination from the adjacent property may have migrated onto the project property.

Given that the project property is a listed contaminated site, all workers who may contact contamination must have 40-hour hazardous waste training, current annual 8-hour refresher training, and conduct work in accordance with site-specific health and safety plan (HASP) prepared by a qualified person (see [WAC 296-843](#)). The HASP should include procedures to prevent exposure to site workers and the public, and additional releases of contamination during excavation, handling, transport, and disposal operations.

Section B - 7(a)(i)

Petroleum-related contaminants in soil and groundwater are primarily volatile organics associated with gasoline, and as such, precautions should be taken regarding inhalation of potential hazardous volatile compounds (this should be addressed in the HASP). Note that diesel is also a contaminant of concern for groundwater.

Section B - 7(a)(ii)

If an underground storage tank is encountered during demolition activities, it must be decommissioned in accordance with local fire department regulations. In addition, if soil or groundwater contamination is encountered during tank decommissioning, the contamination must be reported, characterized, and cleaned up in accordance with Ecology regulations ([WAC 173-340](#)).

Section B – 7(a)(iv)

Any new, unexpected releases of chemicals to the environment must be contained and cleaned up, and should be reported to Ecology (<https://ecology.wa.gov/Footer/Report-an-environmental-issue>).

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Section B - 7(a)(v)

Soil sampling conducted during excavation of soil in contaminated areas must be conducted by an environmental professional. Results of soil sampling are to be submitted to Ecology referencing CSID 11021.

Thank you for considering these comments from Ecology. If you have any questions or would like to respond to these comments, please contact Kim Vik from the Toxics Cleanup Program at (206) 556-5258 or by email at kim.vik@ecy.wa.gov.

Sincerely,



Kelli Price
SEPA Coordinator

Sent by email: Ryan Harriman, ryan.harriman@mercerisland.gov

ecc: Kim Vik, Ecology