



December 22, 2021

Chris Beale, AICP, Senior Planner
City of Puyallup
Development Services Department
333 South Meridian
Puyallup, WA 98371

Dear Chris Beale:

Thank you for the opportunity to comment on the optional determination of nonsignificance/notice of application for the Larson River Road Storage Project (P-21-0087) as proposed by Todd Sawin for AHBL. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SOLID WASTE MANAGEMENT: Derek Rockett (360) 407-6287

The applicant proposes to demolish an existing structure(s). In addition to any required asbestos abatement procedures, the applicant should ensure that any other potentially dangerous or hazardous materials present are removed prior to demolition. It is important that these materials and wastes are removed and appropriately managed prior to demolition. It is equally important that demolition debris is also safely managed, especially if it contains painted wood or concrete, treated wood, or other possibly dangerous materials. Please review the "Dangerous Waste Rules for Demolition, Construction, and Renovation Wastes," on Ecology's website at: Construction & Demolition Guidance. All removed debris resulting from this project must be disposed of at an approved site. All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. Contact the local jurisdictional health department for proper management of these materials.

TOXICS CLEANUP: Sandy Smith (360) 407-7269

This property is within a quarter mile of one known or suspected contaminated site. The site is Style F/X, Facility Site Identification (FSID) 22278. To search and access information concerning this site see <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Cleanup-sites>.

If contamination is suspected, discovered, or occurs during demolition, site preparation, or construction of the auto storage lot, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by sampling, the Department of Ecology must be notified. To notify Ecology, contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at

(360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Sandy Smith with the Toxics Cleanup Program at the Southwest Regional Office at (360) 407-7269.

**WATER QUALITY/WATERSHED RESOURCES UNIT:
Jessica Eakens (360) 407-0246**

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Construction Stormwater General Permit:

The following construction activities require coverage under the Construction Stormwater General Permit:

1. Clearing, grading and/or excavation that results in the disturbance of one or more acres **and** discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more **and** discharge stormwater to surface waters of the State.
 - a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, **and** discharge to surface waters of the State; and
3. Any size construction activity discharging stormwater to waters of the State that Ecology:
 - a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
 - b) Reasonably expects to cause a violation of any water quality standard.

If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted. For additional information on contaminated construction sites, please contact Carol Serdar at Carol.Serdar@ecy.wa.gov, or by phone at (360) 742-9751.

Additionally, sites that discharge to segments of waterbodies listed as impaired by the State of Washington under Section 303(d) of the Clean Water Act for turbidity, fine sediment, high pH, or phosphorous, or to waterbodies covered by a TMDL may need to meet additional sampling and record keeping requirements. See condition S8 of the Construction Stormwater General Permit for a description of these requirements. To see if your site discharges to a

TMDL or 303(d)-listed waterbody, use Ecology's Water Quality Atlas at:
<https://fortress.wa.gov/ecy/waterqualityatlas/StartPage.aspx>.

The applicant may apply online or obtain an application from Ecology's website at:
[http://www.ecy.wa.gov/programs/wq/stormwater/construction/- Application](http://www.ecy.wa.gov/programs/wq/stormwater/construction/-Application). Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

WATER QUALITY/INDUSTRIAL OPERATIONS UNIT:
Honor Carpenter, Senior Industrial Stormwater Permit Facility Manager
(360) 407-6273 | Honor.Carpenter@ecy.wa.gov

Facilities conducting certain industrial activities that discharge stormwater to a surface waterbody or storm sewer system that drains to a surface waterbody are required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for those industrial stormwater discharges under the Department of Ecology's Industrial Stormwater General Permit (ISGP). More information about the Industrial Stormwater General Permit (ISGP) is available at the link below:

<https://ecology.wa.gov/Regulations-Permits/Permits-certifications/Stormwater-general-permits/Industrial-stormwater-permit>

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(GMP:202106315)

cc: Derek Rockett, SWM
Sandy Smith, TCP
Jessica Eakens, WQ
Honor Carpenter, WQ
Todd Sawin, AHBL (Proponent)