



City of Puyallup
Planning Division
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**Addendum to
Determination of Non-Significance (DNS)
Previous Document ID P-18-0154
Addendum ID P-21-0116**

for
**EcoLube Recovery LLC (213 10TH ST SE)
SEPA Standalone & SEPA Environmental Checklist**

Date of Addendum Issuance:	February 24, 2022
Date of Original SEPA Determination Issuance:	November 13, 2019
Project Location:	213 10TH ST SE, PUYALLUP, WA 98372
Proponent:	EcoLube Recovery, LLC
Lead Agency:	City of Puyallup
Lead Agency Responsible Official:	Katie Baker, AICP City of Puyallup Planning Division 333 S. Meridian Puyallup, WA 98371 (253) 864-4165 www.cityofpuyallup.org
Original SEPA Document:	Determination of Non-significance (DNS)
Description:	Request to refurbish and reuse an out-of-service tank ("Tank 3") which was previously identified as not to be used under the previously approved Conditional Use Permit. The tank is proposed to be used for storage/segregation of used motor oil.
Anticipated Areas of Impact:	Transportation, Water, Environmental Health
Location of Background Information:	Puyallup City Hall, 333 South Meridian, Puyallup 98371

PROJECT SPECIFIC MATERIALS (INCORPORATION BY REFERENCE – WAC 197-11-635):

- I. The subject Addendum herein and associated environmental findings are based upon review of the following document(s) submitted by the applicant and official responses from the city in regard to the underlying permit(s). These documents are incorporated by reference, in accordance with WAC 197-11-635, and are available for public review. To request access to electronic copies of project materials, please contact Planning@PuyallupWA.gov or (253) 864-4165, or visit <https://permits.puyallupwa.gov/Portal> and search for the permit (P-21-0116) by selecting “application search” under Planning Division section.
- SEPA Environmental Checklist, dated **September 10, 2021**.
 - Letter from David R. Ravander, P.E., ChemE Consulting LLC, regarding the scope of work for reuse of Tank 3, dated **September 10, 2021**.

- c. Letter from applicant, Eric Spencer, EcoLube Recovery, LLC, regarding the proposal, dated **September 17, 2021**.
 - d. Oil Spill Prevention, Control, and Countermeasure (SPCC) Plan prepared by EVREN Northwest, Inc., dated **October 2021**.
 - e. Critical Aquifer Recharge Areas Report review letter prepared by Lynn Green, L.E.G., EVREN Northwest Inc., dated **November 10, 2021**.
 - f. Response to first Development Review Team (DRT) Letter from the applicant, Eric Spencer, dated **December 1, 2021**.
 - g. Emergency Action Plan prepared by Ricci Keller, received **December 13, 2021**.
 - h. Accidental Spill Prevention/Slug Discharge Plan prepared by EcoLube Recovery, LLC, received **December 13, 2021**.
 - i. Piping plan for Tank 3 prepared by ChemE Consulting, received **December 13, 2021**.
 - j. Site plan prepared by ChemE Consulting, received **December 13, 2021**.
 - k. Traffic Scoping Worksheet prepared by Gregory B. Heath, Heath & Associates, Inc, received **December 13, 2021**.
2. The subject Addendum herein and associated environmental findings are based upon review of the following document(s) previously issued by the City of Puyallup in relation to the proposed project:
 - a. SEPA Determination of Non-Significance (DNS) for Project ID P-18-0154, issued **November 13, 2019** (Attachment A).
 3. Notice of Application (NOA):
 - a. Notice was sent **October 21, 2021**, comment period expired **November 4, 2021**.
 - b. List of recipients, comments received, and a copy of NOA materials are available in the project file, which can be accessed online by visiting <https://permits.puyallupwa.gov/Portal> and searching for the permit (P-21-0116) by selecting "application search" under Planning Division section. Contact Planning@PuyallupWA.gov or the Lead Agency Responsible Official for further information.

BACKGROUND

1. Under prior case number P-18-0154, the subject site received an approved Conditional Use Permit (CUP) to convert an existing facility, previously used for processing bulk quantities of corn syrup, for storage and transfer of used motor oil and byproducts. The previous determination evaluated the reuse of existing storage tanks 1, 2, 4, 7, 8 and 9 for suitability for storing used oil (Class IIIB combustible) material. At that time, five existing tanks on site (numbers 3, 5, 6, 10, 11) were proposed to remain out of service.
2. Since the new use was established, the applicant identified a need for additional storage of used motor oil onsite for segregation and transport volumes. As part of used oil recycling regulation, there are requirements for collection, holding for lab screening and storage for out-bound product(s). EcoLube Recovery LLC intends to separate out-bound products into different distribution grades and requires another storage tank to adequately segregate grades. The applicant also noted that there has been an increase in used oil volumes by 15 to 20% since the original tank plan design.

PROJECT DESCRIPTION

1. The applicant requests to refurbish and reuse an out-of-service tank ("Tank 3") which was previously identified as not to be used under the previously approved Conditional Use Permit. The tank is proposed to be used for storage and segregation of used motor oil distribution grades.

POTENTIAL SIGNIFICANT IMPACTS

1. Transportation

- a. Staff reviewed and approved the traffic scoping worksheet under the original project review. Additional traffic impacts were suspected; however, the applicant has demonstrated that the proposed use of Tank 3 will not increase traffic volumes.
2. Water
 - a. The original DNS documented that the subject site is located within a critical aquifer recharge area. Due to the proposed storage and handling of hazardous substances, the project required completion of a Critical Aquifer Recharge Area (CARA) hydrogeologic report, which found that none of the wells within 1,300 feet of the site were found to be adversely impacted by the proposed use and improvements of the subject site. The applicant provided an additional memo from an engineering geologist which reviewed the new proposal and determined that the additional storage of petroleum product in Tank 3 would not change the findings and that the risk of potential impacts to nearby wells (ground water) and surface water is low.
3. Environmental Health
 - a. The applicant provided a letter from ChemE Consulting regarding the reuse of Tank 3, which noted the following:
 - i. The subject tank was evaluated by a third-party tank inspection firm, Mistras, to evaluate the condition of the tank and it was found to be in satisfactory condition pending implementation of mandatory recommendations. The Mistras tank inspection report was provided as Appendix I to the ChemE Consulting letter.
 - ii. Tank 3's anchoring design was further evaluated by a structural engineer, Conlee Engineers, to verify that the anchoring is consistent with the building code at the time of installation. The structural engineer's report shows that the anchoring was consistent with building code with the addition of one missing anchor bolt component. The structural engineer's calculations are included as Appendix 2 to the ChemE Consulting letter.
 - iii. The detailed scope of work for Tank 3 was provided in the ChemE Consulting letter per the Mistras inspection report recommendations.
 - b. As noted, the subject property is located within a critical aquifer recharge area and potential risk/impacts were assessed through a memo from EVREN Northwest, Inc. The potential risk was found to be low due to several findings, including the implementation of a Storm Water Pollution Prevention Plan and an updated Oil Spill Prevention, Control, and Countermeasure (SPCC) plan to implement best management practices and minimize risk of spills.
 - c. The subject site is located within a volcanic hazard area. Per 21.06.1260, new hazardous facilities are prohibited within volcanic hazard areas. This is an existing use/site that was previously determined to not meet the definition of a "hazardous facility" under PMC 21.06.210(65). In review of the subject application, based on review of the current building codes for hazardous occupancies, the city building code official has determined that the proposed modification would not change the prior determination, i.e. the site would not be considered a hazardous facility.

FINDINGS TO SUPPORT ADDENDUM

1. Staff received a comment letter from the Department of Ecology (ECY) on the subject application, dated November 4, 2021, with comments regarding solid waste management, spill prevention, preparedness and response, toxics cleanup, water quality/industrial operations, and erosion control and water quality measures. The applicant responded to ECY comments and staff confirmed with ECY staff that there were no outstanding concerns with the proposal. The responsible official finds that none of the subject comments from Ecology have substantially changed any current or previous environmental review for the subject site; and,
2. The applicant has demonstrated that the proposed use of Tank 3 will not increase traffic volumes. Therefore, the proposed modification is not anticipated to create new traffic impacts and additional analysis is not warranted; and,

3. Staff has reviewed the proposed project and finds that it is substantially the same as the previous project environmental determination (#P-18-0154) for the site; and,
4. Staff has reviewed the previous SEPA document (#P-18-0154) and finds that anticipated impacts are the same.

DETERMINATION

The Responsible Official determines herein that the project environmental review, while adding new information, did not result in substantial new analysis of significant impacts thus not necessitating a new Threshold Determination. The project SEPA shall reflect:

1. On March 12, 2021, the property owner executed an assignment of funds for onsite landscaping that was required as part of the original Conditional Use Permit approval in order to postpone improvements. As a condition for the subject application, remaining uninstalled onsite landscaping shall be installed and receive final approval in order for the applicant to start operations on proposed Tank 3. Tank 3 shall not be operational, e.g. not used for testing, filling, or otherwise used for product storage until the landscaping improvements are complete.
2. The subject site is located within a volcanic hazard area. Per 21.06.1260, new hazardous facilities are prohibited within volcanic hazard areas. This is an existing use/site that was previously determined to not meet the definition of a "hazardous facility" under PMC 21.06.210(65). In review of the subject application, based on review of the current building codes for hazardous occupancies, the city building code official has determined that the proposed modification would not change the prior determination, i.e. the site would not be considered a hazardous facility.
3. Traffic Impact fees (TIF) will be assessed in accordance with fees adopted by ordinance, per PMC 21.10.
4. Any existing improvements which are damaged now or during construction, or which do not meet current City Standards, shall be replaced.
5. Abide by the current City of Puyallup POTW discharge permit. Follow all accidental spill preventions plans in place in case of a spill.
6. Project shall comply with the recommendations and methods outlined in the Critical Aquifer Recharge Area (CARA) hydrological report and subsequent addendums, as well as the Emergency Action Plan (Rev. 06/01/2021) and the Spill Prevention, Control and Countermeasure Plan (Rev. October 2021).
7. The Accidental Spill Prevention/Slug Discharge Plan (ASSP) shall be updated to recognize Tank 3 prior to Tank 3 becoming operational.
8. Separate permits are required for review and inspection. Compliance with the original CUP determination is required for this tank restoration and service. Reference the Fire Protection Consulting technical report dated August 8, 2019, the ChemE consulting LLC technical report dated October 8, 2019, the ChemE Consultation LLC dated September 10, 2021; to provide qualified third party assessment and inspection reports as part of the permit and inspections required to meet all applicable code requirements (eg, IFC, IBC, NFPA and related standards).



Katie Baker, SEPA Responsible Official

February 24, 2022
Date

ATTACHMENTS

- A. Original SEPA DNS (P-18-0154)