



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 13, 2019

Jennifer Priddy, Assistant Superintendent
Olympia School District No. 111
1113 Legion Way SE, Room 210
Olympia, WA 98501

Dear Jennifer Priddy:

Thank you for the opportunity to comment on the mitigated determination of nonsignificance for the Capital High School Performing Arts Center and Associated CHS Improvements Project located at 2707 Conger Avenue Northwest in Olympia. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

TOXICS CLEANUP: Thomas Middleton (360) 407-7263

If contamination is suspected, discovered, or occurs during the proposed SEPA action, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by testing, Ecology must be notified. Contact the Environmental Report Tracking System Coordinator for the Southwest Regional Office (SWRO) at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact Thomas Middleton with the SWRO, Toxics Cleanup Program at (360) 407-7263.

**WATER QUALITY/WATERSHED RESOURCES UNIT:
Chris Montague-Breakwell (360) 407-6364**

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.

You may apply online or obtain an application from Ecology's website at: <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.

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

(MLD:201900464)

cc: Thomas Middleton, TCP
Chris Montague-Breakwell, WQ
Brett Bures, SCJ Alliance (Lead Agency Contact)
Matt Lane, AIA, McGranahan Architects (Proponent)

ORCAA Comment on SEPA #201900464

Lauren Whybrew <lauren.whybrew@orcaa.org>

Archived/Ross Projects/CHS PAC/SEPA/SEPA Comments

- I recently reviewed a notice regarding the Capital High School Performing Arts Center project. The project proposes the demolition of walls and interior structures in order to attach a new structure to the existing structure. Olympic Region Clean Air Agency (ORCAA) has the following comments for the applicant:
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- ORCAA regulations require an asbestos survey for all demolition projects. Demolition projects by definition also include renovations performed to load-bearing structural members on the current building as part of a remodel.
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- Prior to any demolition project, the following must be completed:
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- -A good faith asbestos survey must be conducted on the structure by a certified Asbestos Hazardous Emergency Response Act (AHERA) building inspector;
- -If asbestos is found during the survey, an Asbestos Removal Notification must be completed and all asbestos containing material must be properly removed prior to the demolition; and,
- -If the structure is 120 sq. ft. or greater, a Demolition Notification must be submitted regardless of the results of the asbestos survey. There is a mandatory 14-day waiting period for the notification, so we recommend the applicant apply for the Demolition Notification as soon as possible.
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- Helpful Links:
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- A list of certified asbestos contractors is available at <https://www.orcaa.org/wp-content/uploads/2017/03/AsbestosContractors2017.pdf>
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- The Demolition Notification form is available at <https://www.orcaa.org/asbestos-demolition-programs/demolition-notification/>
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- If applicable, the Contractor Asbestos Removal Application is available at <https://www.orcaa.org/asbestos-demolition-programs/contractor-asbestos/>
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- If you have any questions or concerns regarding the process, please feel free to contact a member of our compliance team at 360-539-7610.

Thank you,

Lauren Whybrew, Engineer I
Olympic Region Clean Air Agency - "Clean Air is Everyone's Business"

- [2940 Limited Lane NW](#)
- [Olympia, WA 98502](#)
- (360) 539-7610 x 107
- www.orcaa.org