



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

Sent Electronically

June 8th, 2017

Heather Wright
City of Bainbridge Island
280 Madison Avenue North
Bainbridge Island, WA 98110
206-780-3754
pcd@bainbridgewa.gov

RE: Lead Agency File#: PLN50767 CUP, SPR, HMP
Ecology File#: 201702759
Applicant: Bainbridge Island School District

Dear Ms Wright:

Construction and demolition activities may result in dangerous wastes that need to be properly managed and disposed of in accordance with state and federal requirements. Older buildings often contain leaded paint, leaded pipes, paints containing mercury-based biocides, mercury-containing fluorescent lamps, asbestos, PCB ballasts, and other dangerous materials. When buildings are torn down, workers, neighbors, and the environment can be exposed to toxic chemicals. At a minimum, buildings that are slated for demolition must be assessed (a process known as dangerous waste designation) to determine if they contain or are themselves a dangerous waste. Some of the most frequently observed demolition related hazardous waste include:

Mercury containing fluorescent lamps - The "Mercury-Containing Lights - Proper Disposal" law, Chapter 70.275 RCW, requires that all persons, residents, government, commercial, industrial, and retail facilities and office buildings must now recycle their end-of-life mercury-containing lights. This includes mercury-containing lamps that do not designate as dangerous waste, often called "green tip" lights, and glass debris from drum top lamp crushing operations. Although green tip lights will pass TCLP testing, they still contain mercury. Disposal to landfills is prohibited for all mercury containing lights.

The law also requires producers of mercury-containing lights to set up a product stewardship collection and recycling program. This program began operating in January 2015. "LightRecycle Washington" will accept up to ten mercury-containing bulbs per day from individuals and

business at no charge. You must still comply with the regulations for Universal Hazardous Waste. LightRecycle provides another option for safe disposal of lamps. Please see the LightRecycle Washington website for more information, including collection site locations, at <http://lightrecyclewa.org/>.

Asbestos - Old linoleum, ceiling tiles, siding, insulation, and other materials in structures built before 1977 may contain asbestos. When asbestos deteriorates, falls apart or is disturbed the fibers can become airborne and are easily inhaled, settling deep into the lungs and may cause cancer. Prior to demolition the structure must be evaluated for asbestos. If asbestos is identified, removal and disposal must comply with Puget Sound Clean Air Agency regulations. Additional information is available on the PSCAA website:

<http://www.pscleanair.org/business/Asbestos/Pages/regsandresources.aspx>

Lead - Most buildings constructed before 1960 contain heavily leaded paint and buildings constructed as late as 1978 may also contain lead-based paint. Lead-based paint is the primary reason a building or its components may be designated as dangerous waste. Buildings intended for demolition need to be evaluated and possibly tested for lead concentrations to determine if they exceed dangerous waste thresholds. If the structure or its lead-bearing components designate as hazardous waste, all related debris must be managed appropriately and cannot be disposed of as municipal trash. Additional information on lead in dangerous waste is available on the Department of Ecology website: <http://www.ecy.wa.gov/programs/hwtr/dangermat/lead.html>

For additional information on identifying and managing construction and demolition wastes go to Ecology's website:

http://www.ecy.wa.gov/programs/hwtr/dangermat/demo_debris_constr_materials.html

Thank you for considering these comments from the Department of Ecology. If you have any questions or would like to respond to these comments please contact Katy Gibbs at 425-649-7038 or by email at katy.gibbs@ecy.wa.gov.

Sincerely,

Department of Ecology

Northwest Regional Office

(Yvonne Kicken: 201702759)

Cc: Katy Gibbs, Hazardous Waste & Toxics Reduction Program, Ecology