



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

March 14, 2023

Allan Gebhard
Barr Engineering
4300 Market Point Drive, Suite 200
Minneapolis, MN 55435

Re: Notice of Proposed Interim Action: Removal of Contaminated Soils Where Areas of Concern Impact City of Yakima Planned Work

- **Site Name:** Boise Cascade Mill (aka Yakima Mill Site)
- **Site Address:** 805 N. 7th Street, Yakima
- **Facility/Site ID:** 450
- **Cleanup Site ID:** 12095
- **Agreed Order No.:** DE 13959

Dear Allan Gebhard:

The Washington State Department of Ecology (Ecology) is proposing an interim action (IA) at the Boise Cascade Mill (aka Yakima Mill Site) (Site) in accordance with the conditions for IAs as established under Agreed Order referenced above, Section VI. Ecology Determinations, subsection H., and Section VII. Work To Be Performed, subsection H. The IA is necessary to address the health and safety and environmental concerns related to the City of Yakima's planned 2023 installation of utility lines. These utility lines lie within the Right-of-Way (ROW) for the East-West Corridor Project.

With this letter, Ecology is requiring a response to the proposed IA, consistent with our authority under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Supporting information for this proposed interim action is provided below:

City of Yakima Proposed Utility Work Summary

On March 8, 2023, the City of Yakima (City) first shared their plans for the installation of utility lines within the ROW for the future City of Yakima East-West Roadway corridor (East-West Corridor). At the same meeting, the City relayed they communicated with the Boise Cascade Mill PLP regarding the planned utility corridor work.

The Corridor is depicted in Figure 2 (Property Parcel Map, Revised Draft RI Report, Yakima Mill Site) of the Barr Engineering Revised Draft Remedial Investigation Report Yakima Mill Site (RI Report).

The City's planned utility work includes construction activities on the north side of the railroad tracks (the G Street alignment) in addition to work on the south side of the railroad tracks. The corridor passes through contaminated soils at the Small Log Sawmill (AOC12) and at the Log Yard Shop (AOC19). The corridor may pass through other contaminated areas such as the Large Log Sawmill (AOC11) and the Mill Transformers (AOC10). The City plans on bidding the utility work in April 2023 with construction to occur this summer of 2023.

Proposed Interim Action Summary

Ecology proposes the removal of contaminated soil from Areas of Concern (AOC) as identified in the RI Report that intersects with the planned City of Yakima East-West Corridor as depicted in RI Report Figures 25 – 31. The remediation work would not be limited to the City's Corridor, but encompass the entire AOC as presented in the RI Report. Cleanup would be to MTCA Level B cleanup standards for residential land use. At a minimum, the IA cleanup would address the Small Log Sawmill (AOC12), the Log Yard Shop (AOC19), may include the Large Log Sawmill (AOC11), and the Mill Transformers (AOC10). The IA should include coordination with the City to ensure access with any specific contractor requirements.

Ecology Determinations

Ecology believes that the proposed IA is technically necessary as follows:

- Removal of the contaminated soils ahead of construction will reduce threats to human health by eliminating exposure pathways.
- Removal of contamination now creates a preferable remediation scenario given that the other option is splitting up contaminated areas that are difficult to work around. It's also likely cost savings will be realized by removing the contaminated soils in advance of the utility work.
- Removing the contaminated soils in advance of the City's work is a best practice in source control and mitigates potential recontamination of the proposed utility corridor.

PLP Requirements

The PLP shall provide the following actions based on receipt of this letter:

- **Acknowledgement.** Upon receipt of this letter, provide written acknowledgment to Ecology.



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- **IA Response.** Within 10 working days of receipt of this letter, provide a response to Ecology's proposed IA, including a schedule for the development and implementation of the IA.

Assuming agreement with Ecology's proposed IA, next steps would include:

- **A meeting with Ecology and City** to discuss the proposal in detail.
- **The development of an Interim Action Work Plan**, including a Scope of Work and Schedule.
- Supporting Ecology as necessary in meeting the **public participation** requirements for an IA.
- **An amendment to the Agreed Order** to cover the scope and requirements of this IA.

Closing and Contact Information

We appreciate your commitment to cleanup at this Site and look forward to your response to this letter. If you have any questions, please contact me by phone at 509-225-0304 or by e-mail at John.Zinza@ecy.wa.gov.

Sincerely,



John Zinza, PE
Cleanup Project Manager
Toxics Cleanup Program
Central Regional Office

