



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Central Region Office

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

May 10, 2023

**Sent via email**

Shane DeGross  
BNSF Railway Company  
605 Puyallup Avenue  
Tacoma, WA 98421

**RE: Review of Initial Version of the Uplands Draft Cleanup Action Plan**

- **Site Name:** BNSF Track Switching Facility
- **Site Address:** 500 Main Street, Wishram
- **Facility Site ID:** 1625461
- **Cleanup Site ID:** 230

Dear Shane DeGross:

The Department of Ecology (Ecology) has reviewed the initial version of the document titled *“Uplands Draft Cleanup Action Plan, BNSF Wishram Railyard (Ecology Site Name BNSF Track Switching Facility), Wishram, Washington,”* prepared by Kennedy Jenks, and dated November 18, 2022. Comments on the Draft Cleanup Action Plan (DCAP) follow a status update compiled for subsequent Ecology reviewers.

Agreed Order DE 12897, which was issued in October 2015, required that the Potentially Liable Person (PLP) complete a Remedial Investigation (RI), a Feasibility Study (FS), and to prepare a Draft Cleanup Action Plan (DCAP), all of which pertain to the uplands. Ecology previously issued letters of approval for completion of the uplands RI in November 2020 and of the uplands FS in August 2022.

In March 2017, Ecology directed BNSF to conduct investigations of the in-water area along the shoreline adjacent to the uplands site. The sediments RI field work was completed in November 2022 and Ecology is awaiting submittal of the draft sediments RI report. Preparation and submittal of a sediments FS and DCAP will follow approval of the sediments RI report, likely in the latter half of 2023.

This concludes the status summary. Ecology's comments to the DCAP follow. Additional comments regarding the derivation of contaminants of concern and their applicable cleanup levels were provided under separate cover.

1. In the first bullet of **Section 4.5.1**, clarify in parenthesis that the MTCA CULS for soil are Method A Industrial for the railroad property. Delete reference to Method C CULS.
2. In the second bullet of **Section 4.5.1**, add wording in parenthesis that states 'unrestricted land use' after the reference to Method A CULS for the off-railroad property.
3. In the third paragraph of **Section 4.5.2**, change the wording to state the following:  
*"Therefore, for those groundwater contaminants that have individual surface water compliance levels, the surface water screening levels will be applied to site groundwater with the potential to enter the Columbia River. For those groundwater contaminants that do not have individual surface water compliance levels, the groundwater CULs will be used to determine compliance.*
4. In **Section 4.6**, correct the MTCA citation to WAC 173-340-360(2)(c)(ii)(A).
5. In **Section 4.6**, modify the following sentence: *"Cleanup objectives include remediation levels (REL) that will be used to identify when to transition from active to passive treatment."* Typically, when we speak of transitioning from active to passive treatment it refers to moving from engineering-based technologies to passive methods such as monitored natural attenuation where just performance monitoring occurs. This sentence should be clarified, for example, by stating, *"...used to identify when to transition from active to passive treatment of separate phase product."* This clarification emphasizes that the REL refers to the management of separate phase product as opposed to meeting the applicable cleanup levels.

Change the sentence, *"The LNAPL REL is not the same as the LNAPL CUL (Table 4-1)"* to *"The LNAPL REL is not the same as the applicable petroleum hydrocarbon CUL (Table 4-1)"*.

6. In the last bullet of **Section 5.4.2.1**, the comments on the RI and FS are broadly summarized as a preference for permanent solutions to the maximum extent practicable which is a requirement under MTCA.
7. Add a footnote to the header of the **CUL Value Source** column in **Table 4-1** that indicates that unrestricted Method A CULs will apply to that portion of the site that is off BNSF property and that industrial Method A CULs will apply to the BNSF property.

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8. In **Table 5-3**, add WAC 173-201A to the state regulations list and CWA §304 to the federal regulations.

Sincerely,



John Mefford, LHG  
Cleanup Project Manager  
Toxics Cleanup Program  
Central Region Office