

May 4, 2023

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***Submitted via email***

John Zinza  
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**Re: Response to February 27, 2023 Letter From Department of Ecology Regarding New Information – Log yard historical use on east side of I-82**

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

Dear Mr. Zinza:

This letter is submitted in response to the above referenced letter from the Washington Department of Ecology (Ecology) dated February 27, 2023, received by Barr Engineering Co. by email on March 3, 2023, and by US Mail on March 6, 2023 (February 27, 2023 Ecology Letter or Ecology Letter). The February 27, 2023 Ecology Letter provided information including aerial photos with apparent land disturbance in an area located north and south of the Columbia Basin Railroad tracks, east of I-82, and that was once owned by Boise Cascade. The Ecology Letter required that the Boise Cascade Mill Site (Mill Site) PLPs provide the following information within 30 days of receipt of the letter.

- **Acknowledgement.** Upon receipt of this letter, provide written acknowledgement to Ecology.
- **Assessment.** Provide an assessment of this new information in terms of the PLPs understanding of the site as presented in the Agreed Order.
- **Investigation Plan.** Identify the necessary steps to characterize the site, identify mill activities, contaminates and sources, the nature and extent of the contamination as consistent with MTCA and the Agreed Order.
- **Schedule.** Provide a reasonable schedule for appropriate work.

On March 28, 2023, the Mill Site PLPs requested a time extension until May 5, 2023 to respond to the Ecology Letter. The time extension request was approved by Ecology on March 29, 2023.

The following paragraphs provide the information requested in the February 27, 2023 Ecology Letter.

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

Completed with March 7, 2023 email from Allan Gebhard to Rhonda Luke, copy to John Zinza.

**Assessment. Provide an assessment of this new information in terms of the PLP's understanding of the site as presented in the Agreed Order.**

The Mill Site PLPs have reviewed the information in the February 27, 2023 Ecology Letter and Ecology's request and are prepared to investigate the area generally identified with red shading in Exhibits A, B and C attached to the Ecology Letter consistent with the investigation strategy used for areas containing log yard material (LYM) during the completed remedial investigation at the Mill Site. The identified area will be investigated as an additional potential area of concern (AOC) (i.e., AOC 28 – East Side Study Area) (AOC 28) under Agreed Order DE 13959 and applying the January 2019 Revised Final Remedial Investigation Work Plan (including the SAP, QAPP and PHASP) approved by Ecology (Approved RIWP).

The definition of Site, as presented in the Agreed Order is:

“Based upon factors currently known to Ecology, the Site is generally depicted in the Site Diagram (Exhibit A). The Site is further defined by the extent of contamination caused by releases of hazardous substances at the Site, which, based on facts known as of the effective date of this Order, is exclusive of any area 1) where municipal solid waste has come to be located, or 2) which is affected by a release or threatened release of hazardous substances from municipal solid waste.”

Consistent with MTCA, the above definition of the Site reflects the fact that the Site is defined by the extent of contamination caused by releases of hazardous substances at the Site.

AOC 28 was previously part of larger parcels owned by Boise Cascade and was divided by the present-day Columbia Basin Railroad tracks. The current owner of the property located north and south of the railroad tracks is listed on the Property Record Card for Yakima County as “Public Services-County Road”. The area encompassing AOC 28 is shown in Exhibit A to the Agreed Order. It was not however, included in the depiction of the Site boundaries because it was not identified as an area associated with facility operations that involved hazardous substances and was not an area of concern to Ecology or the PLPs.

Based on an initial review of aerial photographs and available test pit and boring logs, it appears that LYM may be present in the fill within AOC 28. No buildings or other developments are shown in the historical aerial photos. The presence of LYM itself does not mean an adjustment of the Site boundary is warranted. If LYM is present, further evaluation of the fill (including the presence/depth of the LYM) and evaluation of groundwater conditions may need to be undertaken to determine if the depiction of the Site boundary in Exhibit A to the Agreed Order merits adjustment. As acknowledged previously, LYM that is not impacted by hazardous substances is not a waste and can be beneficially recycled, composted, or reused without restriction, consistent with WAC 173-350-020(2)(b). Given that LYM is generally viewed as a resource and the apparent lack of facility operations that would have stored or used hazardous substances in AOC 28, we believe that revising the boundaries depicted in Exhibit A to the Agreed Order at this time would be premature.

**Investigation Plan. Identify the necessary steps to characterize the site, identify mill activities, contaminants and sources, the nature and extent of the contamination as consistent with the MTCA and the Agreed Order.**

The steps will be to:

1. Collect and evaluate available information on AOC 28 that may include physical setting, previous investigations and known conditions, facility operational history, aerial photographs, area topography, history of filling, grading and land use since donation of the property to the County, etc.
2. Meet with representatives of Yakima County, the owner of AOC 28 and the current manager of the Cascade Mill Parkway project to obtain access to the County property to perform the AOC 28 investigation, and to coordinate the AOC 28 investigation with the County's plans relating to the area so as not to interfere with the Cascade Mill Parkway Phase 3 project.
3. Develop a preliminary conceptual site model (CSM) for AOC 28 based on the definition in WAC 173-340-200, and on the review of previous investigations, historical operations, current conditions, and the pending public works construction project and property use.
4. Based on the preliminary CSM, identify data gaps relevant to defining the nature and extent of any releases of hazardous substances in AOC 28, and the presence of methane and potential groundwater impacts to the area due to conditions upgradient of AOC 28.
5. Prepare a work plan addendum to the Approved RIWP to address any identified data gaps consistent with the process for evaluating AOCs in the remedial investigation completed on the west side of I-82, incorporating the elements of the Approved RIWP that apply to the investigation of AOC 28 (AOC 28 Work Plan) and submit the AOC 28 Work Plan to Ecology for approval.
6. Complete the investigation as described in the AOC 28 Work Plan after approval by Ecology. The preliminary CSM for AOC 28 will be refined as information is collected during the investigation.
7. Prepare an investigation report and a recommended path forward, all consistent with MTCA and submit the report to Ecology as an addendum to the approved 2021 Final Draft Remedial Investigation Report, consistent with the Agreed Order, the Approved RIWP, and the approved AOC 28 Work Plan.

**Schedule. Provide a reasonable schedule for appropriate work.**

We anticipate completing the investigation of this new AOC concurrent with completion of the planned studies and preparation of the Feasibility Study (FS), as described below.

The schedule for the work described above involves submitting the AOC 28 Work Plan within 45 days of receiving Ecology's approval of this response. The detailed schedule for completing the work will be described in the AOC 28 Work Plan and will depend on the scope of work and on the ability of the Mill Site PLPs to obtain access for the investigation. A general schedule is provided below. The general schedule below assumes timely (within 30 days of receipt) review and concurrence by Ecology to the details of the approach and no delays in gaining access for the work.

The investigation of AOC 28, as required by Ecology's February 27, 2023 Letter, will need to be performed before the draft FS Report can be prepared. Consequently, following is a revised schedule for preparation of the draft FS Report that represents a change to the schedule in our January 13, 2023, letter to Ecology responding to the December 6, 2022 letter from Ecology requesting an updated FS schedule.

In the event approval delays make it necessary to modify the schedule outlined below, we will communicate accordingly with Ecology to adjust the schedule, as necessary. Otherwise, the work elements for the investigation of AOC 28 will be coordinated with the FS field work on the Site west of I-82 in accordance with the revised schedule detailed below.

## **Second Quarter – 2023**

### **Investigation of AOC 28 (East Side of I-82)**

- Identify proposed locations and methods to be used in investigating AOC 28.
- Prepare AOC 28 Work Plan and submit to Ecology for approval.

### **FS Field Work (West Side of I-82)**

- Conduct groundwater sampling for SVOCs at MW-6, MW-12, MW-20, MW-24, MW-100, and MW-101R (this will complete four quarters of sampling at all wells except MW-101R)
- Prepare for and coordinate with subcontractors to complete LYM treatability testing. This information is needed to inform the detailed analysis of alternatives involving the removal of LYM. At the time of LYM treatability testing, soil samples may be collected for analysis of total petroleum hydrocarbon (TPH) or other analytes consistent with methods described in the Approved RIWP. Soil samples will also be collected for analysis of total organic carbon (TOC) to better inform the geochemical model being developed as part of the FS. Ecology will be informed of the activities planned for the LYM treatability testing and the collection of related soil samples with the understanding that the information collected will be incorporated with other portions of the FS and presented comprehensively in the FS Report.
- Prepare for and conduct slug tests in selected monitoring wells to better estimate groundwater flow velocities across the Site. This information will be used to inform the geochemistry modeling for the Site and the placement of performance monitoring wells during groundwater treatability studies. Ecology will be informed of the activities planned for this testing with the understanding that the information collected will be incorporated with other portions of the FS and presented comprehensively in the FS Report.

## **Third Quarter – 2023**

### **Investigation of AOC 28**

- Ecology approval of AOC 28 Work Plan.
- Obtain access from the County to conduct the approved AOC 28 Work Plan.
- Conduct the field work portion of the AOC 28 investigation consistent with the approved AOC 28 Work Plan, including the collection and analysis of soil, soil gas and the first quarterly round of groundwater samples and the verification of laboratory results.

### **FS Field Work**

- Conduct groundwater sampling for SVOCs at MW-101R.
- Conduct LYM treatability testing and collection and analysis of soil samples and verification of laboratory results, consistent with methods described in the Approved RIWP.
- Conduct the slug testing investigation.
- Conduct the first round of sub-slab vapor sampling beneath occupied buildings.
- Provide documentation on the location of the section of piping near MW-6 as required by Ecology.

## **Fourth Quarter – 2023**

### **Investigation of AOC 28**

- Collect the second quarterly round of samples from the AOC 28 monitoring wells, as necessary, consistent with Ecology guidance.

Except as described below, it is anticipated that other field investigation work for AOC 28 will have been completed and that any warranted further actions will be incorporated into the sitewide FS.

### **FS Field Work**

- Conduct groundwater sampling for SVOCs at MW-101R (this will complete the four quarters of sampling of this well).
- Update the PHREEQ geochemical model with additional data gathered from the 2023FS field work.
- Prepare for on-site groundwater treatability testing and advise Ecology of the scope and approach for the planned testing.

### **First Quarter – 2024**

#### **Investigation of AOC 28**

- Collect the third quarterly round of groundwater samples from the AOC 28 monitoring wells, as necessary consistent with Ecology guidance.

#### **FS Field Work**

- Initiate on-site groundwater treatability testing field work, anticipated to include, installing performance monitoring wells, collecting samples, and implementing groundwater treatability testing.
- Conduct the second round of sub-slab vapor sampling beneath occupied buildings.

### **Second Quarter – 2024**

#### **Investigation of AOC 28**

- Collect the fourth quarterly round of groundwater samples from the AOC 28 monitoring wells, as necessary consistent with Ecology guidance.
- Prepare an investigation report for AOC 28 as an addendum to the approved 2021 Final Draft Remedial Investigation Report, including a description of the investigation work, soil boring and test pit logs, monitoring well installation documentation, presentation and evaluation of the data collected in the investigation, an updated CSM for AOC 28 and the overall Site, summaries of the magnitude and extent of soil and groundwater in AOC 28 exceeding applicable preliminary cleanup levels (PCULs) and a description of how the information correlates with the information available for the study area west of I-82.

#### **FS Field Work**

- Conduct on-site groundwater treatability testing field work.
- Compile and analyze results from the groundwater treatability testing.
- Update the PHREEQ geochemical model with additional data gathered from the groundwater treatability testing.

### **Third and Fourth Quarters – 2024**

Prepare draft FS report, including the results from the FS field work and the AOC 28 investigation, for submittal to Ecology within 120 days of receipt of the results from the groundwater treatability testing.

Other work in support of the draft FS Report will occur throughout the schedule presented above. Such work is anticipated to include, compiling background information, establishing applicable or relevant and appropriate requirements (ARARs), evaluating alternatives, and developing cost estimates. The draft FS Report will combine the information in a holistic manner designed to allow Ecology to evaluate the alternatives and select a cleanup action plan according to WAC 173-340-360. Work will be completed consistent with MTCA, and guidance provided by Ecology.

In the event the scope of work is adjusted, or circumstances arise that make it necessary to modify the schedule outlined above, we will communicate accordingly with Ecology with an adjustment to the schedule and the reasons the adjustment is necessary.

We look forward to Ecology's prompt concurrence with the schedule and approach to investigating AOC 28 described above so that we can prepare and submit the AOC 28 Work Plan for Ecology's review and approval.

Please contact Alec or me with any questions or comments.

Thank You  
Allan Gebhard  
Project Coordinator

cc. Rhonda Luke, Valerie Bound, Jennifer Lind