



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

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

June 2, 2023

Sent via email and hard copy

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

Re: Response to PLPs Steps Regarding New Information – Log Yard Historical Use on the East Side of I-82:

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

Dear Allan Gebhard:

The Washington State Department of Ecology (Ecology) has reviewed the Barr Engineering May 4, 2023 letter with the subject Response to February 27, 2023 Letter From Department of Ecology Regarding New information – Log yard historical use on east side of I-82. Your response presents an effort to meet the requirements we identified in our February 27, 2023 letter.

We appreciate your effort and presentation of a route forward. It's enabled Ecology to further develop requirements for this site. In general, Ecology is in agreement that the steps you outlined in your response letter make sense. On the following page, we present our comments and concerns for your consideration.

This letter notification proposes the following steps for Ecology and the public to have a complete understanding of the site, consistent with our authority under the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW¹.

¹ <https://app.leg.wa.gov/rcw/default.aspx?cite=70A.305>

Steps for investigation plan

Consider Ecology's comments below.

Step 1: Collecting available information on AOC 28

Ecology agrees that this step is necessary. A complete and clear presentation of the site is critical to Ecology and the public needs in understanding the site. Your research should reflect that Ecology is considering metals in the groundwater to be a hazardous substance. We understand that the reducing conditions caused by the buried wood waste are recognized to have caused metals previously bound to soils, become mobilized and contaminate the Site groundwater. The information should include a discussion of the portion of the site that is within the footprint of Interstate I-82, and especially focus on any log yard materials that may have been identified, encountered and/or removed during the planning, design, and construction of the interstate. Please ensure that any additional parcels associated with the site that are not covered in our February 27, 2023. Please consider the need to revise the summaries of site history presented in Appendix B of the January 2019 Remedial Investigation Work Plan. Ecology is requesting that we receive the updated summary of site history with appropriate figures in advance on the conceptual site model and work plans.

Step 2: Meeting with representatives of Yakima County.

Ecology appreciates your efforts in meeting and coordinating with Yakima County.

Step 3: Develop a conceptual site model (CSM).

Ecology is requesting an updated conceptual site model for the entire site. The model should identify the areas of concern (AOCs) as well as identifying the planned remedial areas that we understand you are planning to present in the Feasibility Study (FS).

Step 4: Data gaps.

Ecology is requesting a submittal that presents and discusses the data gaps. Ecology views that the data gaps warrant a reevaluation of the CSM. Filling these data gaps are part of the Remedial Investigation (RI) phase and need to occur in advance of the FS. See our response below in Step 7 about reopening the RI.

Step 5: Work plan addendum to Remedial Investigation Work Plan (RIWP).



The development of the addendum RIWP shall be based on the assumption that the existing RIWP does not reflect the current understanding of the site and be developed to reflect the current site understanding. Please ensure that the addendum includes the appropriate figures and content that it can be evaluated as a standalone document by Ecology, the public, and other interested parties.

Step 6: Investigation.

Ecology has no comments at this time.

Step 7: RI report.

Ecology will evaluate if an addendum report is acceptable or if the RI needs to be reopened. The Ecology approval of the RI identified that the Ecology reserves the right to re-open the RI report based on new information. We believe that the new information regarding log yard waste may be sufficient to reopen the RI. However, we will hold off on requiring a re-opening of the RI pending a review of the work plan, investigation results, and/or an evaluation of comments (if received) during the public comment period for the RI.

Schedule

Ecology thanks you for the schedule you provided, which gives us an idea of your plans and goals. We will re-evaluate the schedule after you consider the comments we've shared.

Available to Meet, Closing and Contact Information

Ecology is available to meet as necessary to discuss your plans and the route forward for the cleanup of this site. The meeting will allow us to present additional comments and questions that should benefit your work. We look forward to hearing from you and receiving your submittals for the site.

If you have any questions about this response and these opinions, please contact me by phone at 509-225-0304 or e-mail at John.Zinza@ecy.wa.gov.

Sincerely,



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

