

**From:** [Winslow, Frank \(ECY\)](#)  
**To:** [Hal Lee](#)  
**Cc:** "[Sarah Snyder](#)"; [Peter Kingston](#); [Mitchell, Treasure \(ECY\)](#)  
**Subject:** Ross Simmons Lumber Co - XS0013 - No Further Action Likely Letter  
**Date:** Wednesday, September 6, 2023 8:28:44 AM  
**Attachments:** [2023.09.02\\_RossSimmonsLumberCo\\_XS0013\\_NFA-Likely.pdf](#)

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Hi Hal,

Please find attached Ecology's No Further Action (NFA) Likely letter for the Ross Simmons Lumber Co Site. This letter is being sent via email only, so please reply that you have received this email and are able to open the attachment.

Ecology's NFA Likely letter is based on several presumptions and conditions – one presumption of primary importance is that continued groundwater monitoring will result in groundwater cleanup levels being achieved due to continued natural attenuation. The actual timeframe for this is highly uncertain, and if this does not occur within roughly 5 years, contingency measures may be needed.

The letter includes a list of anticipated next steps, including several deliverables. Please ensure that Ecology is continually updated as this work proceeds.

Ecology suggests that the excavation and offsite disposal portion of the cleanup work proceed as soon as possible, since that work may facilitate natural attenuation of groundwater to some degree. Note that Ecology requests a few interim deliverables prior to conducting the excavation work.

The cleanup plan also includes capping and covering of the remaining soil contamination following excavation cleanup to serve as an ecological barrier. The cap will consist of structures, pavement, and potentially, aggregate of sufficient compaction and thickness. Ecology suggests that this cap be considered as you prepare site development plans. Ecology will be needing a cap design document as well as documentation of the construction of that cap.

As mentioned during previous telephone calls, we understand that the planned operations on the Property will include placement and storage of lime. In addition to meeting local and state regulatory requirements for this operation, Ecology suggests consideration of prevention of any groundwater recharge by waters infiltrating the lime, so that pH impacts to groundwater are not caused by the operation. Ecology Toxic Cleanup Program has cleanup sites where contamination concerns have been caused by high pH groundwater resulting in mobilization of metals and arsenic.

Please let us know if you have any questions regarding this letter. Ecology appreciates that ongoing efforts to clean up this site.

Thanks, Frank

**Frank P. Winslow, LHG**

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