



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

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February 12, 2024

Sent via email and hard copy

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

RE: Ecology Comments on Revised Agency Review Draft Sediment Remedial Investigation Report for the Following Site:

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

Dear Shane DeGross:

Ecology has additional comments on the revised draft Sediment Remedial Investigation Report. Note that there are changes to the text that may not be described in our comment callout boxes. These changes may be as simple as the addition of a single word.

Through email, I will send our version of the draft report that shows our text revisions and our comments that are set off in callout boxes or directly inserted into the text.

Comment 1. **Executive Summary:** The risk language consistently minimizes the risk for subsistence fishers. Wording such as “slight” and “limited” should be removed from the document. An exceedance is an exceedance and the data shows exceedances. Rather than using these adverbs, a figure should be added, or an existing figure should be modified to show the exceedance factors if you want to communicate the magnitude of the exceedances.



- Comment 2. **Section 4.6.3, Human Health Exposure Scenarios and Pathways:** Regarding the second sentence of the first paragraph, it appears that a calculation for risk-based concentrations was done, however, this calculation should be added here to show that the child exposure is different for cPAHs.
- Comment 3. **Section 4.6.3, Human Health Exposure Scenarios and Pathways:** The Yakama Nation informed Ecology that subsistence net fishing is occurring at the in-water portion of the site. Please add reference to net fishing in the last paragraph of this section.
- Comment 4. **Section 5.1, Ecological Risk Screening:** Please revise the first paragraph consistent with our two comments described in the callout boxes.
- Comment 5. **Section 5.1.1, Identifying Cleanup Sites Based on Benthic Criteria:** Revise the text to reference the entire data set, which includes all data collected in the 2018 investigation. Incorporate our text revision in this section.
- Comment 6. **Section 5.1.2, Identifying Cleanup Sites Based on Bioaccumulative Criteria:** Revise the wording in the third paragraph as we have indicated in our comment. While there may be other sources unrelated to the site, the data shows that the site is a source.
- Comment 7. **Section 5.1.2, Identifying Cleanup Sites Based on Bioaccumulative Criteria:** The statement in the fourth paragraph that there weren't any CSL exceedances is inaccurate. Exceedances in benthic CSL are a driver for requiring more sampling as was done in this case. See our revised text in Section 5.1.1.
- Comment 8. **Section 5.2, Human Health Risk Screening:** In reference to the paragraph under the heading of Shellfish Consumption, a value 8X background is not a "slight" exceedance. Revise the text consistent with our comment.
- Comment 9. **Section 5.2, Human Health Risk Screening:** In the paragraph under the heading of Beach Play, revise the text by eliminating the adverb "slightly".
- Comment 10. **Section 5.3, Standards Comparison:** Revise this section to add the 2018 investigation results. The 2018 data shows SCO and CSL exceedances for TPH-Diesel and TPH-Heavy Oil.
- Comment 11. **Section 5.3, Standards Comparison, Table 5-1, Step 1 Standards Comparison:** Add the 2018 data as shown by our revision. Ensure that all relevant data from the 2018 investigation are included in this table.

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- Comment 12. **Section 6, Summary and Conclusions:** Revise the text in the summary and conclusions to reference the 2018 data which shows benthic CSL exceedances for TPH-Diesel and TPH-Heavy Oil.
- Comment 13. **Section 6, Summary and Conclusions:** Revise the text in the third bullet point paragraph to reference risks to the benthic community that are posed by CSL exceedances.
- Comment 14. **Section 6, Summary and Conclusions:** In the paragraph for the fourth bullet point, remove the words “slight” and “limited”. Remove language throughout the draft report that minimizes risk posed to subsistence fishers and other receptors.
- Comment 15: **Figures:** As we have stated previously comments, add figures that show each exceedance for each chemical on a map. One of these figures should depict the locations of the sediment core samples with callouts that show the intervals where NAPL was detected in these cores as well as the chemistry and their concentrations compared to the SMS benthic criteria. This information is significant since the conclusions in the report state that TPH-DRO/HRO concentrations exceeded the SCOs at just a few stations, yet we cannot determine which intervals of each relevant core was analyzed.
- Comment 16. In closing, I want to emphasize that Ecology’s changes to the draft report are not discretionary. We will not grant approval of the Sediment RI Report unless the text is revised with what we deem to be appropriate responses to our comments. Failure to revise the draft report to Ecology’s satisfaction especially regarding the risks posed by NAPL will generate another round of edits and a continued lack of regulatory approval until our comments are sufficiently addressed.

Sincerely,



John Mefford
Hydrogeologist
Toxics Cleanup Program
Central Region Office

cc: Elena Ramirez Groszowski, Yakama Nation