



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

February 23, 2024

Eric Rapp
Director Environmental Compliance
JELD-WEN, Inc
500 JELD-WEN Road
Craigsville, WV 26205

Re: Clarification on Creosote Area Cleanup Plans at the Jeld Wen Site

- **Site Name:** Jeld Wen
- **Site Address:** 300 W Marine View Drive, Everett, WA 98201-1030
- **Facility/Site No.:** 2757
- **Cleanup Site No.:** 4402
- **Agreed Order No.:** DE 5095

Dear Eric Rapp:

As we have discussed, the Washington State Department of Ecology (Ecology) has suggested a modification in the approach of developing and implementing the Step 2 pre-remedial design investigation (PRDI) for the Creosote Area. The Step 2 investigations are intended to gather data to support design of the remedial systems defined within the Cleanup Action Plan (CAP), dated August 2023. Components of the selected cleanup alternative for the Creosote Area portion of the Site detailed within the CAP are as follows:

1. Shallow Soil Excavation and Offsite Disposal
2. Enhanced In-Situ Bioremediation (BIO)
 - a. Air Sparge (As) and Soil Vapor Extraction (SVE)
 - b. Nitrate, Nutrients, and Surfactant (NNS) Recirculation
3. Monitored Natural Attenuation (MNA)
4. Contingency Measures (Thermal Treatment)

Success of the remedial measures implemented in the Creosote Area will be ultimately determined through performance and compliance monitoring activities.

Ecology has determined that there is a reasonable likelihood of achieving the cleanup objectives stated within the CAP by implementation of components 1, 2a, and 3. Hence, Ecology is suggesting that component 2b, NNS recirculation can be considered a contingency measure in case components 1, 2a, and 3 do not result in cleanup objectives being met.

Therefore, the collection of data to support design of NNS recirculation can be deferred until such time that Ecology has made a determination that components 1, 2a, and 3 are unlikely to result in achieving cleanup objectives. Such a determination could be made following either 1) review of data following implementation of Step 2 PRDI work plan activities, or 2) following implementation of CAP cleanup components. The timeframe for such a determination would solely be at Ecology's discretion; however, Ecology is optimistic that the execution of cleanup components 1, 2a, and 3 will result in cleanup objectives being met, and no need for NNS being identified. Ecology notes that the existing contingency measure within the CAP of thermal treatment is unchanged; however, thermal treatment essentially becomes a second contingency measure should a primary contingency measure of NNS recirculation (if needed) fail to result in achieving cleanup objectives.

The above change is not considered to be a significant change to the CAP, but rather primarily results in a modification of the sequencing of the cleanup components specified within the CAP. No modification to Agreed Order DE 5095 appears to be warranted at this time.

Please contact me at (509) 424-0543 or frank.winslow@ecy.wa.gov with any questions regarding this letter.

Sincerely,

A handwritten signature in blue ink that reads "Frank P. Winslow".

Frank P. Winslow, LHG
Cleanup Site Manager
Toxics Cleanup Program
Headquarters Cleanup Section

fpw: af