From:	Winslow, Frank (ECY)
To:	"Eric Rapp"
Cc:	"Nathan Soccorsy"; "Jason Cornetta"; Morman, Josh (ECY); Edwards, Susannah (ECY); Hardwick, Ryan (ECY)
Subject:	RE: Jeld Wen - Ecology Initial Comments on Step 2 Sediments Work Plan
Date:	Monday, March 4, 2024 8:37:21 AM
Attachments:	Ecology Comments on Step 2 Work Plan - Sediments 2024_03_04.pdf

Hi Eric,

Please find attached Ecology's comments on the PRDI Step 2 Work Plan, Marine. These comments are being sent via email only, so please reply that you have received this email and are able to open the attachment.

As stated in the attached memorandum, new comments are highlighted for your convenience, and are based on the supplemental figures provided to Ecology on February 23, 2024. As discussed in the attached, Ecology is requesting four additional sampling locations within the Southern Shoreline area to provide for a more refined definition of the SMAs in this area.

Ecology notes that as with any investigation, the possibility of new data gaps being identified by the new data cannot be precluded. While none of us are wanting to have an additional PRDI investigation phase, and the existing work plan will hopefully provide sufficient data to support design, we must nonetheless retain some flexibility in case new data result in a change in the site conceptual model or understanding of contaminant extent.

Ecology anticipates having an Ecology representative onsite during the Step 2 sampling work. As previously discussed, this will be especially important during the selection of samples for sieving analysis. We are all hopeful that a correlation can be made between sieved wood waste percentage and visual observations such that the amount of sample sieving can be reduced. We also hope to work closely with your team during the decision process for selecting samples for laboratory analysis and anticipate that there may be potential for efficiencies to be made during that process. As such we anticipate that maintaining a collaborative working relationship will be critical for the execution of this work.

Please let me know if you have any questions regarding the attached.

Thanks, Frank

Frank P. Winslow, LHG

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Frank.Winslow@ecy.wa.gov

From: Winslow, Frank (ECY)
Sent: Monday, February 26, 2024 10:09 AM
To: Eric Rapp <ERapp@jeldwen.com>
Cc: Nathan Soccorsy <nsoccorsy@anchorqea.com>; Jason Cornetta <jcornetta@anchorqea.com>; Morman, Josh (ECY) <jomo461@ECY.WA.GOV>; Edwards, Susannah (ECY)

<sued461@ECY.WA.GOV>; Hardwick, Ryan (ECY) <ryha461@ECY.WA.GOV>
Subject: Jeld Wen - Ecology Initial Comments on Step 2 Sediments Work Plan

Hi Eric,

Please find attached Ecology's initial comments on the Step 2 Sediments (Marine) Work Plan. These comments are being sent via email only, so please reply that you have received this email and are able to open the attachment.

As mentioned in the attached comments memo, Ecology received requested maps on February 23, 2024 and we anticipate providing additional feedback based on these maps. In addition, there could be comments or feedback from our team regarding other elements of this work plan. We will strive to get any additional feedback to you as soon as possible.

Please let me know if you have any questions regarding the attached comments.

We recognize that it is a disappointment that Ecology has rejected the use of selected Step 1 sediments data for mapping (SMA delineation) purposes (see General Comment #1 in the attached). We recognize that your team does not agree with this conclusion, but Ecology's sediments team believes that this decision is technically sound and necessary. Therefore, I suggest that we move forward on this point without further discussion, since this has already been discussed numerous times.

Another consequential comment (General Comment #2) pertains to the selection of core samples for analysis, based on other depths. We recognize that the number of samples submitted for laboratory analysis has significant cost consequences. However, it is important that any assumptions of contamination based on data collected at various depths be conservative, and we can't make assumptions of intermediate samples being uncontaminated outside of the Knoll area, where a strong contamination depth trend has been noted.

Ecology anticipates having an Ecology representative onsite during the Step 2 sampling work. As previously discussed, this will be especially important during the selection of samples for sieving analysis. We are all hopeful that a correlation can be made between sieved wood waste percentage and visual observations such that the amount of sample sieving can be reduced. We also hope to work closely with your team during the decision process for selecting samples for laboratory analysis and anticipate that there may be potential for efficiencies to be made during that process.

We appreciate Jeld Wen's team's efforts in preparing the Step 2 work plans, and addressing Ecology's comments.

Thanks, Frank

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