

**From:** [Winslow, Frank \(ECY\)](#)  
**To:** "Eric Rapp"  
**Cc:** [R. Scott Miller](#); [Chris Kramer](#); [Hardwick, Ryan \(ECY\)](#)  
**Subject:** RE: JELD-WEN - Step 2 Uplands Revised Work Plan  
**Date:** Thursday, March 28, 2024 4:05:18 PM  
**Attachments:** [DRAFT FINAL PRDI Work Plan - Upland Areas of Jeld Wen Site\\_032224\\_TRACKED\\_ECY\\_feedback.docx](#)  
[DRAFT FINAL App A SAP and QAPP- Upland Areas of Jeld Wen Site\\_032224\\_TRACKED\\_ECY\\_feedback.docx](#)

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Hi Eric,

Ecology has completed our review of the revised PRDI Step 2 Uplands Work Plan and SAP/QAPP documents, including the responses to Ecology's comments.

Attached are the two documents, in track changes format, with some additional feedback from Ecology. There is one comment within the work plan that includes a minor edit. Other comments in both documents are not requesting a revision but are just providing some additional feedback from Ecology.

Please proceed with finalizing the uplands work plan and resubmitting it, with licensing stamp and signature. We will provide our final concurrence on the work plan within a letter regarding both the uplands and marine work plans, following our review and response of concurrence for the marine work plan.

Ecology appreciates the thorough work done within these documents and we look forward to the results of these investigation activities. As discussed within the work plan, there may be some need for some field decisions. Ecology will plan to have designated personnel available to discuss any such field decisions. I plan to be Ecology's contact for the uplands work, provided no schedule conflicts are forthcoming. Please keep us in the loop as you get closer to executing these investigations.

As previously discussed, potential future flooding of the Creosote Area during King/ very high tides remains of concern to Ecology. The work plan includes additional planned activities (e.g. surveying) to further assess this concern. We recommend continued discussions with the current property owner to ensure that existing and new/planned infrastructure can be made as resilient as possible to potential impacts from flooding events.

Thanks, Frank

**Frank P. Winslow, LHG**

WA Expedited VCP Site Manager  
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(509) 424-0543 (cell)

[Frank.Winslow@ecy.wa.gov](mailto:Frank.Winslow@ecy.wa.gov)

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**From:** Eric Rapp <ERapp@jeldwen.com>  
**Sent:** Friday, March 8, 2024 1:37 PM  
**To:** Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>

**Cc:** R. Scott Miller <[smiller@slrconsulting.com](mailto:smiller@slrconsulting.com)>; Chris Kramer <[ckramer@slrconsulting.com](mailto:ckramer@slrconsulting.com)>;  
Hardwick, Ryan (ECY) <[ryha461@ECY.WA.GOV](mailto:ryha461@ECY.WA.GOV)>

**Subject:** RE: JELD-WEN - Initial Comments on Step 2 Uplands Work Plan

External Email

Hi Frank,

The formal response to Ecology's revised comments on the draft Pre-remedial Design Investigation (PRDI) Work Plan for Upland Areas of Jeld Wen Site, received on February 21, 2024 is provided for Ecology's review. This response also references the February 23, 2024 Clarification on Creosote Area Cleanup Plans at the Jeld Wen Site letter sent by Ecology. Responses to the comments were also verbally discussed with Ecology during a virtual meeting on February 21<sup>st</sup>. It is our understanding that Ecology will not be issuing additional comments and that the next step is preparation and submittal of the final PRDI Work Plan. With your review and concurrence of the attached responses, JELD-WEN will submit the Final PRDI Work Plan – Uplands per the Agreed Order schedule.

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

Thank you,

**ERIC RAPP** | DIRECTOR ENVIRONMENTAL COMPLIANCE – GLOBAL ENVIRONMENTAL, HEALTH & SAFETY

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**From:** Eric Rapp <[ERapp@jeldwen.com](mailto:ERapp@jeldwen.com)>  
**Sent:** Thursday, February 22, 2024 6:01 AM  
**To:** Winslow, Frank (ECY) <[fwin461@ECY.WA.GOV](mailto:fwin461@ECY.WA.GOV)>  
**Cc:** R. Scott Miller <[smiller@slrconsulting.com](mailto:smiller@slrconsulting.com)>; Chris Kramer <[ckramer@slrconsulting.com](mailto:ckramer@slrconsulting.com)>;  
Hardwick, Ryan (ECY) <[ryha461@ECY.WA.GOV](mailto:ryha461@ECY.WA.GOV)>  
**Subject:** RE: JELD-WEN - Initial Comments on Step 2 Uplands Work Plan

Hi Frank,

Thank you for updating, and the discussion surrounding the BIO testing deferral. We will continue to

process the comments and revert back Ecology soon.

**ERIC RAPP** | DIRECTOR ENVIRONMENTAL COMPLIANCE – GLOBAL ENVIRONMENTAL, HEALTH & SAFETY

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**Please consider the environment before printing this email**

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**From:** Winslow, Frank (ECY) <[fwin461@ECY.WA.GOV](mailto:fwin461@ECY.WA.GOV)>  
**Sent:** Wednesday, February 21, 2024 6:22 PM  
**To:** Eric Rapp <[ERapp@jeldwen.com](mailto:ERapp@jeldwen.com)>  
**Cc:** R. Scott Miller <[smiller@slrconsulting.com](mailto:smiller@slrconsulting.com)>; Chris Kramer <[ckramer@slrconsulting.com](mailto:ckramer@slrconsulting.com)>;  
Hardwick, Ryan (ECY) <[ryha461@ECY.WA.GOV](mailto:ryha461@ECY.WA.GOV)>  
**Subject:** RE: JELD-WEN - Initial Comments on Step 2 Uplands Work Plan

**CAUTION:** This email originated from outside of JELD-WEN! Do not click links or open attachments unless you recognize the sender and know the content is safe! If you are unsure, verify with the sender by phone.

Hi Eric,

Please find attached an updated version of Ecology's comments memo for the Uplands Step 2 PRDI Work Plan.

As discussed in the memo, comments related to BIO elements of remediation other than air sparge (AS) and soil vapor extraction (SVE) have been removed. In addition, two additional edits have been added as highlighted text. Ecology will be sending a separate letter to memorialize the deferral of the BIO testing components from the Step 2 PRDI Work Plan.

Please let me know if you have any questions regarding this updated comments memorandum.

Thanks, Frank

**Frank P. Winslow, LHG**

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**From:** Winslow, Frank (ECY)

**Sent:** Wednesday, February 14, 2024 10:32 AM

**To:** 'Eric Rapp' <[ERapp@jeldwen.com](mailto:ERapp@jeldwen.com)>

**Cc:** 'R. Scott Miller' <[smiller@slrconsulting.com](mailto:smiller@slrconsulting.com)>; 'Chris Kramer' <[ckramer@slrconsulting.com](mailto:ckramer@slrconsulting.com)>; 'Jason Cornetta' <[jcornetta@anchorgea.com](mailto:jcornetta@anchorgea.com)>; Hardwick, Ryan (ECY) <[ryha461@ECY.WA.GOV](mailto:ryha461@ECY.WA.GOV)>; 'Nathan Soccorsy' <[nsoccorsy@anchorgea.com](mailto:nsoccorsy@anchorgea.com)>; Morman, Josh (ECY) <[jomo461@ECY.WA.GOV](mailto:jomo461@ECY.WA.GOV)>; Edwards, Susannah (ECY) <[sued461@ECY.WA.GOV](mailto:sued461@ECY.WA.GOV)>

**Subject:** RE: JELD-WEN - Initial Comments on Step 2 Uplands Work Plan

Hi Eric and Jeld-Wen Team,

Please find attached Ecology's comments on the Draft Jeld-Wen PRDI Step 2 Uplands Work Plan. As you are aware, this work plan is intended to address potential data needs for the design of the upland remedial actions for the Site. Please let me know if you have any questions regarding these comments.

Ecology notes that our initial comments were provided to you on February 8, 2024 and additional clarification on comment B-10 was provided via email on February 9, 2024. Comment text that was not included within the February 8, 2024 initial comments are **highlighted** in the attached for your convenience. In addition, **bold** font had been added for selected action items and summary points.

As discussed during the call yesterday, we are expecting to schedule a Teams call with you to discuss Comment B-10, and potentially selected other comments such as on the proposed bench scale testing.

Also, it may be advisable to provide your comment responses prior to submitting the revised work plan in order to hopefully prevent any additional rounds of comments on this document. Such comment responses do not need to include all of the specific revisions within the work plan, but should make it clear on how the comment is being addressed.

Ecology notes that actions regarding the uplands stormwater system are required within the Cleanup Action Plan dated August 2023. No work regarding stormwater is currently within the PDRDI work plan or Ecology's comments (except for requested discussion of preventing runoff from reaching the proposed Woodlife excavation). Ecology has concluded that data needs for executing the stormwater work required within the CAP should be determined by Jeld Wen. However, we would like to note that the Cleanup Action Plan states on page 32:

*Therefore, as part of source control, the performing PLPs must remove and dispose accumulated sediment and/or debris from stormwater systems including but not limited to stormwater pipes, catch basins, vaults and manholes prior to marine sediment cleanup action.*

We look forward to working with you toward the completion and execution of this work plan.

Thanks, Frank

**Frank P. Winslow, LHG**

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**From:** Winslow, Frank (ECY)

**Sent:** Thursday, February 8, 2024 11:55 AM

**To:** Eric Rapp <[ERapp@jeldwen.com](mailto:ERapp@jeldwen.com)>

**Cc:** R. Scott Miller <[smiller@slrconsulting.com](mailto:smiller@slrconsulting.com)>; Chris Kramer <[ckramer@slrconsulting.com](mailto:ckramer@slrconsulting.com)>; 'Jason Cornetta' <[jcornetta@anchorqea.com](mailto:jcornetta@anchorqea.com)>; Hardwick, Ryan (ECY) <[ryha461@ECY.WA.GOV](mailto:ryha461@ECY.WA.GOV)>; Nathan Soccorsy <[nsoccorsy@anchorqea.com](mailto:nsoccorsy@anchorqea.com)>; Morman, Josh (ECY) <[jomo461@ECY.WA.GOV](mailto:jomo461@ECY.WA.GOV)>; Edwards, Susannah (ECY) <[sued461@ECY.WA.GOV](mailto:sued461@ECY.WA.GOV)>

**Subject:** JELD-WEN - Initial Comments on Step 2 Uplands Work Plan

Hi Eric and Jeld-Wen Team,

Please find attached Ecology's initial comments on the Jeld-Wen PRDI Step 2 Uplands Work Plan. We are referring to these as "initial comments" because we have not fully completed our review of this document. Generally, we would want to provide all of our comments at one time, but scheduling constraints may slightly extend our completion of the review of this document, and we wanted to get you what we have at this time to facilitate timely finalization of the work plans. We are currently also working on our review of the PRDI Step 2 Sediments Work Plan and will be providing our comments on that document when they are available.

As discussed in the attached comments memo, not all comments are requesting a revision to the work plan. Some, such as feedback on Health & Safety, are provided to emphasize the importance of a topic.

Let us know if you would like to discuss any of the attached comments during our call on next Tuesday. Some comments are within technically nuanced subjects, and may be better discussed within a core group call rather than the entire team. If you would like to have a separate call(s), just let us know.

Also if you could provide the anticipated agenda for the Tuesday call, we would appreciate it.

Thanks, Frank

**Frank P. Winslow, LHG**

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