



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office
1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

April 22, 2024

Sent via email and hard copy

Marty Miller
Executive Director
Office of Rural and Farmworker Housing
1400 Summitview Avenue, #203
Yakima, WA 98902-2965

Re: Bours Greenhouse Cleanup Status

- **Site Name:** Bours Greenhouse
- **Property Address:** 1501 Folsom Avenue, Yakima
- **Facility/Site ID:** 100000762
- **Cleanup Site ID:** 17012
- **County Assessor's Parcel #'s:** 181324-23562, 181324-23564

Dear Director Miller:

Thank you for your letter of April 19, 2024, which expressed concerns with the listing of Bours Greenhouse¹ as a contaminated site. Ecology recognizes the difficulty in securing resources for affordable housing projects, and we'll do everything we can to ensure the funding remains intact.

To your primary concern about the site being contaminated, there is, unfortunately, soil contamination above state cleanup levels. Arsenic and dieldrin in soil are both above the state cleanup levels of 20 ppm, and 0.0028 ppm, respectively. The value you referenced in your letter for arsenic is actually incorrect. The laboratory reports for the project do not match the table in the report prepared by Blue Mountain Environmental & Consulting Company, Inc. (BMEC), "Phase I Environmental Site Assessment Report, 1518 West Lincoln Avenue, Yakima, Washington 98902, BMEC, May 10, 2022."² The lab reports show a value of 45 ppm vs the 16 ppm you shared. There are other values that do not match the lab reports. Dieldrin actually has a value of 2.8 ppm versus the 0.028 ppm you have in the table. This is likely due to a rounding error.

¹ <https://apps.ecology.wa.gov/cleanupsearch/site/17012>

² <https://apps.ecology.wa.gov/cleanupsearch/document/139743>

There were other contaminants above cleanup levels, but your assertion that Ecology has no basis for listing the site is incorrect. I understand your confusion, though, based on the table contained in the Blue Mountain Environmental report. Although Ecology reviewed the same report, we used supplemental information from laboratory reports in “Analytical Data Report for Project P2022/0408; 1518 W. Lincoln Yakima, OnSite Environmental, Inc., May 4, 2022”³ to make our determination that contamination exists at the property.

Blue Mountain Environmental also used incorrect cleanup levels. Ecology has outlined the correct cleanup levels in the table below. The highest contaminant value referenced against Ecology’s Cleanup Levels and Risk Calculation (CLARC),⁴ which lists protective values based on Direct Contact (lowest of Non-cancer vs. Cancer) and soil value determined to be protective of groundwater (based on vadose zone).

Analyte	Highest Detected Value (mg/kg)	Ecology Listed Protective Value (based on soil direct contact) (mg/kg)	Ecology Listed Protective Value (based on soil protective of groundwater) (mg/kg)	Final Protective Concentration (mg/kg)
4,4'DDE	1.6	2.9	0.22	0.22
4,4'-DDD	0.05	4.2	0.34	0.34
4,4'-DDT	1.9	2.9	3.5	2.9
Dieldrin	2.8	0.063	0.0028	0.0028
gamma-BHC	0.013	0.91	0.0062	0.0062
beta-BHC	0.12	0.56	0.0023	0.0023
Arsenic	45	0.67	2.9	20 ^A
Lead	190	250	3000	250

Note: shaded cell indicates contaminant exceeds one or more Ecology Listed Protective Value.

A – Cleanup level based on direct contact using Equation 740-2⁵ and protection of groundwater for drinking water use using the procedures in WAC 173-340-747(4),⁶ adjusted for natural background for soil.

³ <https://apps.ecology.wa.gov/cleanupsearch/document/139746>

⁴ <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Contamination-clean-up-tools/CLARC>

⁵ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-740>

⁶ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-747>

Marty Miller
Office of Rural and Farmworker Housing
April 22, 2024
Page 3

Ecology does acknowledge receiving several calls from neighbors expressing their opposition to the project. However, I can assure you that had no bearing on our listing of the site. Site listings are dependent on environmental sampling data showing levels above state cleanup standards.

I also noticed the report was completed in 2022. I think much of this could have been avoided by consulting with Ecology at that time. Please consider reaching out earlier about any environmental concerns. At this point, it's clear that more sampling will be necessary.

Ecology staff strive to communicate clearly and provide accurate information. I'm sorry if you felt you weren't getting the clarity you needed for your project. I appreciate that you are under pressure with funding and neighborhood concerns. I hope we can work together to clean up this important affordable housing project.

Please don't hesitate to reach out via email at valerie.bound@ecy.wa.gov or by phone at 509-901-7107.

Sincerely,



Valerie Bound
Section Manager Toxics
Cleanup Program
Central Regional Office

cc: Jennifer Schlenske, Director, Justice Housing
David Bowen, Regional Director, Ecology