



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

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

June 7, 2024

Sent via email

Allan Gebhard
Barr Engineering
4300 Market Point Drive, Suite 200
Minneapolis, MN 55435

Re: Ecology Comments on Agency Review of the Draft 2022-2023 Supplemental Groundwater Sampling at Mill Site

- **Site Name:** Boise Cascade Mill
- **Site Address:** 805 N 7th Street, Yakima
- **Facility Site No.:** 450
- **Cleanup Site ID No.:** 12095
- **Agreed Order No.:** DE 13959

Dear Allan Gebhard:

Thank you for submitting the above-referenced document in accordance with Agreed Order DE 13959. Provided below are the Department of Ecology's (Ecology) comments on the draft 2022-2023 Supplemental Groundwater Sampling at Mill Site. Ecology welcomes a discussion of the comments if needed.

Comment 1: The technical memorandum should include cumulative sampling results.

Discussion: Ecology expects the technical memorandum, requesting removal of Contaminants of Potential Concern (COPCs), to include sampling results from previous monitoring events. This is a standard best practice for technical reports and should be incorporated into all future submittals.

Resolution: The final document shall contain the previous sampling results in the appropriate text, tables, and figures.

Comment 2: Ecology conditionally approves the removal of pentachlorophenol (PCP) as a COPC from the groundwater to drinking water pathway.

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Discussion: Ecology provided an opportunity for the City of Yakima's consultant for the adjacent and down-gradient contaminated site (Interstate 82 Exit 33A Yakima City Landfill – Cleanup Site 3853 (I-82 Landfill)) to comment on your request to remove PCP as a COPC from the groundwater to drinking water pathway. The consultant provided information that allows Ecology to conditionally approve the removal of PCP as a COPC on the Boise Cascade Mill site.

Resolution: For Ecology to agree with the request to remove PCP as a COPC from the groundwater to drinking water pathway, the Boise Cascade Mill PLP is to provide a stamped technical memorandum that acknowledges PCP will need to be addressed as a COPC if PCP appears in the future at either site.

Comment 3: At this time, Ecology does not approve of the removal of bis(2-ethylhexyl)phthalate (DEHP) as a COPC from the groundwater-to-drinking water pathway.

Discussion: Ecology provided an opportunity for the City of Yakima's consultant for the adjacent and down-gradient site (I-82 Landfill) to comment on your request to remove DEHP as a COPC from the groundwater to drinking water pathway. The consultant informed Ecology that DEHP is still a COPC at the I-82 Landfill site and has concerns about removing DEHP from the Mill Site at this time. Ecology agrees with the comments provided by the consultant.

Resolution: As long as DEHP is a COPC on the I-82 Landfill Site, DEHP will remain a COPC on the Boise Cascade Mill site. The Boise Cascade Mill's site PLP may revisit this request at a later date. You are welcome to continue evaluating the data collected from the Landfill Site for data that supports your request and re-request the removal of DEHP as a COPC as appropriate.

At this time we will not require continued quarterly sampling for bis(2-ethylhexyl)phthalate as a COPC for the groundwater to drinking water pathway.

Bis(2-ethylhexyl)phthalate will need to be addressed in the Feasibility Study (FS) as a COPC for the groundwater to drinking water pathway. As a reminder, the Agreed Order provides provisions for Resolution of Disputes if you wish to dispute our decision.

We sincerely appreciate the cooperation and collaboration efforts made to move this site forward. Please contact me at (509) 225-0304 or john.zinza@ecy.wa.gov if you require any clarification of these comments or have further questions.

Sincerely,



John Zinza
Cleanup Project Manager
Toxics Cleanup Program
Central Regional Office