



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 1, 2024

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

Re: Stormwater system cleanup at the Jeld Wen site:

Site Name: Jeld Wen
Site Address: 300 W Marine View Dr, Everett, Snohomish County, WA 98201-1030
Cleanup Site ID: 4402
Facility Site ID: 2757
Agreed Order No. DE 5095

Dear Eric Rapp:

We have had a few conversations with you regarding the stormwater system cleanup component of the Cleanup Action Plan (CAP) dated August 2023, during several Teams calls. We understand that the Jeld Wen team is planning to perform an update of the stormwater system survey work that was performed in 2019.

Ecology recent received a phone call from a potential purchaser. This party indicated that they may be interested in purchasing a portion of the former Jeld Wen property, to the west of the Creosote and Dioxin area, and were working to assess potential environmental risk from a due diligence perspective. Their primary concern pertained potential concerns from the stormwater system.

The CAP stated:

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.

Prior to implementing the marine sediment cleanup action, the Step 2 pre-remedial design investigation (PRDI) activities will need to be completed as well as remedial designs prepared. Therefore, we anticipate that cleanup of the stormwater system is not necessarily an immediately concern.

However, Ecology advises timely progress on this task in order to ensure that it could not delay implementation of the marine sediment cleanup action. In addition, there may be other considerations that could help prioritize this work.

Besides the cleanup action for the stormwater system discussed in Section 3.2.2 of the CAP, Ecology recommended repairing damaged and/or deteriorated stormwater structures to prevent or reduce infiltration of upland fill material and/or groundwater into the stormwater system.

Ecology recognizes that Jeld Wen is not the current owner of the property and that they are not eager to perform work with an objective of enhancing the operability of the stormwater system. Cleanup of the stormwater system may be most efficiently done within the context of the rehabilitation of the stormwater system. However, we have no information to suggest that the current owner is planning to perform work to enhance the operability of the stormwater system, and the cleanup of the stormwater system cannot be delayed for too long. Ecology suggests that the following course of action may be most appropriate to address these concerns:

- 1) Update the 2019 stormwater system survey to determine which outfalls are currently functioning. We recommend that inspections take place following a significant rainfall event and during low tide to assess flow from outfalls. Video surveys inside the stormwater lines are also anticipated to be helpful. Ecology anticipates that a detailed mapping of the stormwater system would be one outcome from this task.
- 2) Following the survey of the stormwater lines and determination of what outfalls are currently functioning, perform vacuum truck cleanouts of the stormwater lines and vault structures, to the extent possible. Re-videoing of lines following vacuum cleanouts may be appropriate to document post-cleanup conditions.
- 3) For non-functional outfalls, permanently plug both ends (inlet and outfall) to prevent future releases of potentially contaminated materials within these lines.
- 4) The possibility of needing to excavate a portion of such lines if contamination is found that cannot be removed via vacuum truck cannot be precluded at this time.

Based on previous site visits, Ecology believes that there may be currently three outfalls that are functioning at this time; two on the northeast side, and one on the southwest side near where the property line has a near 90-degree bend.

Ecology does not advise any water jetting or water-based cleaning of the stormwater lines since this could result in the possibility of a contamination release to groundwater or (to surface water from groundwater) via breaks in the stormwater lines.

Ecology also recommends discussing this concern with the current property owner. Ecology would be happy to participate in such conversations if that would be helpful.

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Ecology appreciates the efforts by the Jeld Wen team in cleaning up this Site. Please contact me at frank.winslow@ecy.wa.gov or at (509) 424-0543 if you have any questions regarding this letter.

Sincerely,



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

cc: Erik Gerking, Port of Everett
Nathan Soccorsy, Anchor QEA, LLC
Ron Woolworth, W&W Investments
Susannah Edwards, Ecology
Ryan Hardwick, Ecology
Josh Morman, Ecology