



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Central Region Office

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November 25, 2024

**Sent via email**

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

**Re: Ecology comments on draft East Side Conceptual Site Model and Data Gaps Report**

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

Dear Allan Gebhard:

The Washington State Department of Ecology (Ecology) received the Barr Engineering, draft East Side Conceptual Site Model and Data Gaps Report (CSM-DG Report) on March 29, 2024. Thank you for submitting the above-referenced document in accordance with Agreed Order DE 13959 and the requirements of the Model Toxics Control Act (MTCA).

As you are aware from your meetings with Ecology staff, Ecology has delayed in responding to the CSM-DG Report, pending receipt of an environmental investigation report from Yakima County. On August 29, 2024, Ecology received a copy of the draft Initial Investigation Report, East-West Corridor Roadway (II-EWC Report), Yakima County, Washington prepared by Maul Foster & Alongi, Inc. (MFA) for Yakima County. Ecology assumes you have a copy of the MFA II-EWC Report; and thus, are not enclosing a copy with this letter. If this assumption is incorrect, Ecology can forward a copy.

Provided below are Ecology's comments on the draft CSM-DG Report with consideration to the information in the MFA II-EWC Report. Note that Ecology may provide additional comments under separate correspondence based on our engagement with the Yakama Nation.

Ecology is available for further discussion of the comments if necessary. Our responses are consistent with our authority under the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW<sup>1</sup>.

### **Ecology comments on CSM-DG Report**

**Comment 1: Report Structure.** The report structure presented Ecology with review challenges and consumed significant review time.

Discussion: While Ecology's appreciates the PLPs efforts to achieve the cleanup of the Site and the effort on this draft CSM-DG Report, we found the report structure challenging to review in terms of Ecology's goals to understand the environmental data gaps associated with historical mill operations and periods of operations. This challenge resulted in additional review time on the part of Ecology staff. We have prepared our comments to help you create a revised draft of the CSM-DG Report, with the goal of better informing Ecology of the data gaps, and the subsequent effort to fill the data gaps. The comments provided our major concerns with the report and information provided. We anticipate performing a more detailed review of the next draft.

Resolution: Provide a revised draft CSM-DG Report that addresses Ecology's comments. Upon reviewing a revised draft CSM-DG Report, Ecology will comment on the appropriate next investigation steps for the overall Boise Cascade Mill Site (BCM Site).

**Comment 2: Extents of the Site.** Ecology's opinion is that the Boise Cascade Mill MTCA cleanup site extends east beyond the east side of Interstate 82 (I-82) onto property utilized during the operation of the former Boise Cascade Mill (Yakima Mill).

Discussion: On page 4 of Agreed Order No. DE 13959 (AO) under part IV. Definitions, subpart A. Site, the AO provides a general location of the Site and that the Site is generally depicted in the Site Diagram (Exhibit A). The AO goes on to say that the "Site is further defined by the extent of contamination caused by releases of hazardous substances at the Site...". Based on the extents of contaminated soils and groundwater identified in the MFA II-EWC Report on parcels 191318-11002 & 191318-41002 the Site is further defined to include contaminated media on 191318-11002 & 191318-41002.

Resolution: The CSM-DG Report should be updated to reflect the currently known extents of contamination at the Boise Cascade Mill Site extending to properties east of I-82 in comparison to the former mill operations and not totally focus on property boundaries. This opinion is reflected in our more specific comments below.

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<sup>1</sup> <https://app.leg.wa.gov/rcw/default.aspx?cite=70A.305>

**Comment 3: Report size.** The size of the report (376 MB) is too large for Ecology's electronic file storage system.

Discussion: Thank for using a file service, but the file was too large to manage and upload to the Ecology's Document Storage and Retrieval System (DSARS). DSARS has a 100 MB limit for uploading documents.

Resolution: Future electronic deliverables must stay below the 100 MB limit. If you have to split a document to address the file size limit, split the document at key locations such as appendices, figures, tables, sections, etc.

**Comment 4: Copies of reference documents and records.** Provide Ecology a copy of all referenced documents and records per the Agreed Order. VIII. Terms and Conditions, G. Retention of Records.

Discussion: Ecology is requesting copies of all documents and records referenced in the report and the report transmittal letter. This request includes all drafts, correspondence, communications, and comments sent to and received from the County.

Resolution: Provide Ecology with the requested documents and records.

**Comment 5: Next steps, to be determined after finalizing report.** As part of finalizing the CSM-DG report, Ecology will determine the next steps including the preparation of an RI Work Plan addendum.

Discussion: Ecology expects that the RI Work Plan Addendum will not take a lot of effort on Ecology's part (or for the public) to coordinate with the RI, during Ecology's review. Ecology requires that the work plan be prepared in accordance with WAC 173-340-350 (4)(a)<sup>2</sup> and meet the requirements of WAC 173-340-350 (5). Ecology is requiring the submittal of the RI Work Plan for our review and approval,

Resolution: Prepare the work plan addendum in a manner that facilitates a relatively straightforward and efficient review for Ecology approval.

**Comment 6: Ecology view of previously prepared RI, and the RI report going forward (and public participation and tribal engagement).** Ecology will require the RI report to be revised and resubmitted; and include findings from the remainder of the site previously not investigated.

Discussion: Ecology's view is based on the Site encompassing I-82 and extending past I-82 onto property located on the east side of I-82 that is part of the historical mill site impact.

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<sup>2</sup> <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-350>

In addition to the previously prepared Barr Engineering RI report never going through the public participation process, the Yakama Nation has expressed concerns to Ecology that the RI report should cover the whole site (in addition to other comments about its content). Based on the contamination identified by the County on the east side, the RI Report must cover the full nature and extents of the site.

As part of our future review of an RI Work Plan document, Ecology will identify public participation requirements specific to the Boise Cascade Mill RI activities including the previous RI effort. The requirements may include the additional opportunities and additional methods identified in WAC 173-340-600 (3) & (4).<sup>3</sup>

Resolution: We are requiring a revised RI Report covering the entire site prior to going out for public comment.

**Comment 7: Report structure continued.** Let the historical mill operations drive the structure of the report versus the parcels. The report structure was very challenging to work through as a regulator when evaluating a submittal on a site.

Discussion: Section 3.2 is broken down into parcels resulting in a repetitive approach discussing the aerial photos, ground surface, previous investigations, and conclusions. While some of the information may be specific to each parcel it seems like a lot of overlapping information with a focus on parcels (such as in a phase 1 or 2) versus looking at the extents of the former mill operations and overlaying the parcels on a figure. Restructuring this section with an emphasis on clearly identifying the extents and activities on the former mill operational site (as well as the cleanup site) is critical to moving forward in reviewing and approving this data gaps report, the conceptual site model, and subsequent RI work plan addendum.

Resolution: Restructure this report as discussed above. Ecology is available to discuss this further and provide more details and clarification as needed. You might find the RI template helpful, located on Ecology's website.<sup>4</sup>

**Comment 8: Abbreviations and Acronyms.** Ensure abbreviations are consistent with the Agreed Order and abbreviations commonly used by Ecology.

Discussion: There is not much to discuss here, but the following examples will drive home the importance and intent of this comment. Example: The AO identifies Ecology as "Ecology" not as "DOE". Page iv, Abbreviations "PCUL". The report defines "PCUL" as "Potential Clean Up Level", while Ecology defines "PCUL" as "Preliminary Cleanup Level".

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<sup>3</sup> <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-600>

<sup>4</sup> <https://ecology.wa.gov/regulations-permits/guidance-technical-assistance/cleanup-report-checklists-and-templates>

Please avoid introducing a definition that conflicts with an Ecology acronym and definition. Note additionally that Barr Engineering identifies PCUL as Preliminary Cleanup Level in previously submitted documents, such as the RI.

Resolution: Review all abbreviations and acronyms for consistency with the AO and Ecology standards. Redefine an acronym for “Potential Cleanup Level” if that acronym is even needed. Provide Ecology the definition of a Potential Cleanup Level and the context in which it is used in this report.

**Comment 9: Number of parcels vs extents of historical operations.** Please consider this clarification regarding Ecology’s request and intent regarding information on portions of the historical mill operations not included in the RI investigation.

Discussion: In Ecology’s February 27, 2023, letter regarding “New Information – Log yard historical use on east side of I-82”, we requested an investigation plan for Parcels 191318-11002, and 191318-41002 as shown on Exhibit A of the letter.

In Ecology’s June 2, 2023, letter regarding “Response to PLPs Steps Regarding New Information – Log yard historical use on east side of I-82”, Ecology requested that the investigation effort also address any additional properties that were part of the former Boise Cascade Mill Site that are not covered in the AO and not covered in the February 27, 2023, letter. We want to be clear that we did not limit the additional investigation work to six parcels, and instead require a full understanding of known and suspected contamination related to historical mill operations. In Exhibit 1, the Fulcrum Environmental Consulting, Inc. “East of I-82 and I-82 Corridor Document Review and Site Reconnaissance Memorandum,” dated March 28, 2024, identifies that the Ecology February 27, 2023, letter to Barr Engineering directed the PLP to evaluate six parcels. Our subsequent letter sent a message to ensure that all parcels (the total number was not specified) that were owned and used in the historical log yard operations be evaluated for data gaps.

Resolution: Meet the intent of providing Ecology an understanding of known and suspected contamination related to historical mill operations on the former mill site previously not investigated including the I-82 corridor. Support the understanding narrative regarding the historical mill property graphically. Provide comments to Exhibit 1 as necessary to reflect Ecology’s request to look at all parcels and property related to former mill site operations.

**Comment 10: Emphasis on approval vs providing information in the introduction and throughout the document.** Please separate out the multiple unnecessary references to approved documents, and the identified next steps, and focus on the data gap analysis.

Discussion: The multiple references to the approved RI do not take into account that Ecology intends to allow the public to participate in reviewing the RI. We are anticipating comments that will likely result in the need to revise the RI.

In regard to public notices and participation for an RI, refer to WAC 173-340-350<sup>5</sup> Remedial Investigation (4)(a)(iii). Upon reviewing a revised CSM-DG Report that addresses our comments satisfactorily, Ecology will revisit the next steps to fill the data gaps including whether an RI work plan addendum is appropriate. Therefore, the steps you lay out on page 2 need to be validated upon addressing Ecology's comments satisfactorily.

To further emphasize this comment about the emphasis on "approval", the reference includes a report title with the word "Approved" in it that is not part of the report title. See the report "Barr Engineering Co., 2021a. Approved Revised Draft Investigation Report with Addendum to August 2021 Revised Draft Remedial Investigation Report...".

Resolution: You are welcome to provide a separate memo that identifies your view of the next steps and "approved" documents, which allows Ecology to respond separately. Update the report to focus on what the data gaps report is covering and how it came about.

**Comment 11: Defining mill operations leading to the nature and extent of contamination (narrative and graphically).** Section 2 - Mill Site Project Background. A figure that depicts the extents of the historical operation mill site, and not just the Mill Site depicted in the Exhibit to the Agreed Order is required.

Discussion: The descriptions and figures in this report don't provide a clear picture of the extents of the historical mill operations timewise and in different phases to understand the nature and extents of contamination. The focus seems to be on parcel boundaries. Although parcel boundary information is relevant, it should not drive how the report is developed.

The following citations from WAC 173-340-200<sup>6</sup> definitions should help in understanding the intent behind this comment and our need to understand the Site:

"Site" means the same as "facility."

"Facility" means (a) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, vessel, or aircraft, or (b) any site or area where a hazardous substance, other than a consumer product in consumer use, has been deposited, stored, disposed of, or placed, or otherwise come to be located.

Resolution: Clarify the extents of the historical mill site operations narratively and graphically and build the report around the site operations versus various parcel boundaries. The clarification of the nature and extents includes the entire site, including the portion that is not the I-82 corridor.

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<sup>5</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-350>

<sup>6</sup> <https://apps.leg.wa.gov/wac/default.aspx?cite=173-340&full=true#173-340-200>

The review should clearly identify offsite contamination or activities that could have caused contamination to extend past the historical mill operation footprint.

**Comment 12: Provide specific references to MTCA and Ecology Guidance.** There are statements in your report that reference MTCA and Ecology Guidance in general regarding log yard material. Please support your statements regarding your view of log yard waste.

Discussion: You express opinions about meeting MTCA and Ecology Guidance without specific citations. For example, see your footnote on page 6 regarding Log Yard material, without specific citations.

Resolution: Provide citations as needed throughout your document.

**Comment 13: Preliminary vs final COPCs and PCULs.** As a reminder, COPCs and PCULs are preliminary until the Cleanup Action Plan is approved.

Discussion: This reminder is provided based on comments in the report about finalized conclusions regarding Mill Site COPCs and PCULs.

Resolution: Ensure that the report context recognizes when COPCs and PCULs are final. Additionally, the analytical results from the County's effort should be compared to the list of COPCs and PCULs and updated as necessary.

**Comment 14: Identify previous environmental investigations.** Ensure that all previous environmental investigations are identified and included in the data gap assessment.

Discussion: Ecology understands that the previous investigations by Shannon & Wilson, Inc. (S&W) were both environmental and geotechnical. Though the focus of the S&W investigations was geotechnical, it clearly included an environmental element as evident in the title of their reports. See your section 3.2.4.3 Previous Investigations and Known Conditions. Of interest is that the Shannon & Wilson. 2023. Geotechnical Engineering and Environmental Report—Cascade Mill Parkway, Phase 3, Yakima County, Washington includes a reference to an earlier report in 2020 as follows:

Shannon & Wilson, 2020, Final design, geotechnical engineering and **environmental report**, stages 1 and 2, East-West Corridor Project, Yakima County, Washington: Report prepared by Shannon & Wilson, Inc., Seattle, Wash., 21-1-22425-002, for HW Lochner, Lacey, Wash., February.

Did Barr Engineering evaluate the 2020 S&W report as part of their data gaps analysis?

Resolution: Correctly identify that the S&W effort included an environmental investigation. Ensure the references are correct. Evaluate the 2020 S&W report as part of your data gaps analysis effort.

**Comment 15:** Section 4 - Area of Concern. Provide references.

Discussion: This section requires better support with references. For example, in the first sentence of paragraph 4, borings are referred to with no reference to provide supporting information as to when, where, and who placed the borings

Resolution: Support statements through this section by providing the appropriate references.

**Comment 16:** Section 5 - Conceptual Site Model, missing pathways. The conceptual site model (CSM) is incomplete since it does not include the preferential pathway that impacts sediments and terrestrial and ecological receptors.

Discussion: To meet the requirements for preparing a CSM in MTCA, the impact to sediments and the terrestrial and ecological receptors need to be accounted for in the CSM and the report.

Resolution: Address sediments and the terrestrial and ecological pathways in the report including but not limited to Section 5 - Conceptual Site Model, Figure 6 (North CSM Cross Section AOC 28), and Figure 7 South CSM Cross Section AOC 28.

**Comment 17:** Section 5 - Conceptual Site Model, for the Site. The CSM is incomplete since the parcels on the east side of I-82 are now understood to be part of the Site. Therefore, the CSM should include the whole Site, which means the extents of the Site on the west side of I-82 in addition to the extents of the Site on the east side of I-82.

Discussion: As presented in the opening of this letter, the parcels on the east side of I-82 are part of the Boise Cascade Mill Site. The introduction of Section 5 says that the "AOC 28 CSM is integrated with the CSM for the Boise Cascade Mill Site that is described in the 2021 RI Report and Addendum in Section 5.6 of this Report," yet the Figures for the CSM (Figure 6 and 7) don't support this integration.

Resolution: Update this section to adequately detail the Boise Cascade Mill Site including the contamination on the east side of I-82. Provide updated CSM to Ecology prior to the AOC 28 RI Report as presented in Section 5.6, last paragraph.

**Comment 18:** Section 5.2 last paragraph regarding a list minus bis(2-ethylhexyl)phthalate (DEHP).

Discussion: See Ecology's position on the removal of DEHP as expressed in our June 7, 2024, letter to Barr Engineering.



Resolution: Note Ecology’s position in future text and in moving forward with this cleanup.

**Comment 19: Sediment Management Standards.** In accordance with MTCA, compliance with state Sediment Management Standards is required. A data gap assessment that identifies data gaps associated with sediments and a conceptual site model that includes sediments is required.

Discussion: Meeting state sediment management standards is a requirement of MTCA as indicated below:

WAC 173-340-200<sup>7</sup> Definitions. “Sediment” means the term as defined in WAC 173-204-505.<sup>8</sup>

WAC 173-204-505 (22) "Surface sediment" or "sediment" means settled particulate matter located at or below the ordinary high water mark, where the water is present for a minimum of six consecutive weeks, to which biota (including benthic infauna) or humans may potentially be exposed, including that exposed by human activity (e.g., dredging).

WAC 173-340-760<sup>9</sup>– Sediment cleanup standards. In addition to complying with the requirements in this chapter, sediment cleanup actions conducted under this chapter must comply with the requirements of Chapter 173-204 WAC.<sup>10</sup>

The report references “pond bottom material” (Page. 32. Section 5.3 - Impacted Media), instead of the correct term “sediment,” and also excludes the Cascade Mill Pond from further investigation. Additionally, sediments are not included in the conceptual site model. The context of the report indicates that sediments are not being addressed.

Resolution: The data gaps effort, conceptual site model, and all activities going forward are required to meet the requirements of WAC 173-204 Sediment Management Standards. The revised draft CSM-DG report must address data gaps regarding sediments.

**Comment 20: Identify previous investigations.** The report contains generalities and ambiguity regarding past investigations.

Discussion: Provide Ecology with citations to support your statements. For example on Page. 32, the Section 5.3 - Impacted Media starts with “Previous investigations...”.

Resolution: Provide citations with specificity throughout the document.

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<sup>7</sup> <https://apps.leg.wa.gov/wac/default.aspx?cite=173-340&full=true#173-340-200>

<sup>8</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-204&full=true#173-204-505>

<sup>9</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-760>

<sup>10</sup> <https://apps.leg.wa.gov/WAC/default.aspx?cite=173-204>

**Comment 21: The Site and Cleanup levels.** Since the MTCA cleanup Site encompasses property on both sides of the highway, cleanup levels and COCs apply to both sides of the highway.

Discussion: Cleanup levels apply to the Site, which includes both sides of the highway. Cleanup levels and COCs established for the County's remedial work will be considered for the Boise Cascade Mill Site and vice versa. This currently is a data gap.

Resolution: Update the text to reflect that the east side of I-82 is part of the overall Site in terms of COCs and COPCs.

**Comment 22: Cultural Resources.** This topic needs to be more prominent in the report to ensure that it is easily addressed and given the level of attention that it is warranted.

Discussion: The topic of cultural resources is obscure in the report (see Section 6 - Data Gap analysis). The report needs to be clear that an Inadvertent Discovery Plan will be updated and included with any field activities going forward. Additionally, the report should be clear that tribal consultation shall occur in accordance with WA State requirements as expressed at WAC 173-340-815<sup>11</sup> Cultural resource protection. Additionally, the WA State Department of Archaeology and Historic Preservation (DAHP) website<sup>12</sup> provides information on meeting cultural resource requirements.

Resolution: The revised draft should be clear about your plan to address WA state cultural resource requirements.

**Comment 23: Next Steps.** The focus of the next steps should be solely on addressing Ecology's comments with the goal of submitting a CSM-DG Report that Ecology can approve. Ecology will not approve a CSM-DG report that lays out a path leading to an RI Report Addendum.

Discussion: **The next submittal will be a revised draft of the CSM-DG report.** The next steps may identify that an appropriate investigation work plan is necessary to address the data gaps. Describing anything past the work plan is premature and will likely impact Ecology's approval of the CSM-DG report. If it's necessary to describe the next steps, please do so in a separate letter. Ecology looks forward to your view on how the current redox study and additional groundwater study will address portions of the former mill (known part of Interstate 82 (I-82) and east of I-82).

Regarding the appropriate investigation work plan, refer to our July 3, 2024 letter in response to the Barr Engineering Request for a Conference Call to discuss Ecology's April 3, 2024 letter and memo to the Yakima County – East-West Corridor Project.

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<sup>11</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-815>

<sup>12</sup> <https://dahp.wa.gov/archaeology>

In our July 3 letter, we discuss that our approach to the County's investigation effort is consistent with an initial investigation. Ecology is carrying this approach forward to the extents of the historical mill operations on the east side of I-82 and inclusive of I-82.

Resolution: Please focus the next steps of leading towards a work plan for the appropriate investigation.

**Comment 24: References, additional comments.** This comment provides an expanded request and clarifies our earlier comment on providing references and records. Ecology needs unlocked copies of reports as well as copies of communications between the PLP and Yakima County for the referenced communications and any unreferenced communications.

A) Section 8 - References, second reference. Barr Engineering Co. and Fulcrum Environmental Consulting, 2019 Revised Final Remedial Investigation Work Plan, Yakima Mill Site.... Ecology needs a non-secured (unlocked) electronic copy of this work plan, as well as separate electronic copies of the Fulcrum Environmental Consulting documents in the Appendices of the work plan.

Discussion/Resolution: Provide the unlocked electronic work plan and standalone files of the Fulcrum Environmental Consulting summaries of site history Appendix B1 and B2.

- B) Section 8 - References. Please provide a copy of the following referenced documents.
- a) Yakima County, 2023a. Cascade Mill Parkway Phase 3 Improvements Project, 95% Design Project-RC 3446-6 Plan Set...
  - b) Yakima County, 2023b. Conference call with Brett Sheffield and Matt Peitrusiewicz....
  - c) Yakima County, 2023c. Conference call between Brett Sheffield and Matt Peitrusiewicz...
  - d) Yakima County, 2023d. Electronic Communication from Brett Sheffield, Yakima County Engineering Manager to Ryan Mathews...
  - e) Yakima County, 2024. Electronic Communication from Brett Sheffield, Yakima County to Ryan Mathews...

Discussion/Resolution: Please provide Ecology with an electronic copy of the above list of referenced documents.

**Comment 25: COPCS.** Ecology will comment on the COPCs after the findings come in from the Yakima County initial investigation. See Barr Engineering Appendix A. Development of Mill Site Contaminants of Potential Concern (COPCs).

Discussion: There is a potential data gap that will be determined and potentially influenced by the Ecology review of the Yakima County investigation.

Resolution: Expect future comments from Ecology on this matter.

**Comment 26: Figures, Mill Site limits of historical operations.** Graphically depict the former mill site operations and associated evolution of the operations for different eras.

Discussion: Identify the former mill site boundary on all figures. Where appropriate, identify extents of contamination. Without the former mill site boundary, there is a lack of perspective regarding the figures.

Resolution: Identify the outline (extents) of the entire former mill site property and operations in both the Barr Engineering and Fulcrum Environmental Consulting reports.

**Comment 27: Figures, Site Names.** Whenever you are referring to a MTCA cleanup site, use the Ecology names and facility/cleanup IDs. The legend needs to distinguish between what is the cleanup site versus the historical limits of the mill operations.

Discussion/Resolution: Use Boise Cascade Mill Facility Site 450 / Cleanup Site 12095; and Interstate 82 Exit 33A Yakima City Landfill Facility Site 1927 / Cleanup Site 3853.

### **Yakama Nation Comments – Review by Ecology**

As identified in WAC 173-340-620,<sup>13</sup> Ecology engages with tribes as an “integral part of Ecology’s responsibilities.” Additionally, Ecology has a Memorandum of Understanding (MOU) with the Yakama Nation. Per the MOU, the Yakama Nation is an “interested tribal government” for this site, and accordingly, Ecology confers with the Yakama Nation on key decision points in the cleanup process.

For this report, Ecology received a comment letter from the Yakama Nation Fisheries (YN) (represented by R. Elena Ramirez Groszowski, L.G.) on November 8, 2024. An initial review shows the Yakama Nation noticed many of the same report deficiencies as Ecology. Ecology plans to review the Yakama Nation comment letter more closely and will transmit our comments with direction in a separate correspondence at a future date.

Given the extensive comments from Ecology, we expect to see better quality reports in the future.

We sincerely appreciate the cooperation and efforts made to move this site forward. We reserve the right to add additional comments as appropriate.

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<sup>13</sup> <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-620>

Allan Gebhard  
Barr Engineering  
November 25, 2024  
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Please contact me at (509) 225-0304 or [john.zinza@ecy.wa.gov](mailto:john.zinza@ecy.wa.gov) if you require any clarification of these comments or have further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Zinza". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Zinza".

John Zinza  
Cleanup Project Manager  
Toxics Cleanup Program  
Central Regional Office