



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Central Region Office

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

March 13, 2025

**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:

Ecology is following up on our February 20, 2025 email reply to the Barr February 17, 2025 letter regarding Ecology's comments on the Barr Engineering, draft East Side Conceptual Site Model and Data Gaps Report (CSM-DG Report) on March 29, 2024. We are also taking this opportunity to request an updated schedule of activities. This follow-up correspondence is consistent with our authority under the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.<sup>1</sup>

**Ecology has NO additional comments on the draft CSM-DG Report.**

As expressed in our February 20, 2025 email, Ecology has no additional comments on the CSM-DG Report. Our December 20, 2024 letter's ending includes the text: "We reserve the right to add additional comments as appropriate." As a reminder, this text is Ecology's standard language on draft submittals and is not intended to be used to hold up addressing Ecology comments. Our February 20, 2025 email also identified that addressing some of our earlier comments should be independent of a revised CSM-DG Report, and thus should not be delayed by a revised CSM-DG Report. See below for more details.

---

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

Allan Gebhard  
Barr Engineering  
March 13, 2025  
Page 2 of 3

Your February 17, 2025 letter indicates that you are desiring to seek clarification and discuss the next steps. Ecology is open to scheduling a meeting for that purpose.

**Select comments from our November 25, 2024 letter requiring immediate action**

Our February 20<sup>th</sup> email identified that Comment 4 from Ecology’s November 25, 2024 letter should be addressed independent of a revised CSM-DG Report submittal. Comment 24 from our November 25, 2025 letter should also be addressed independent of a revised CSM-DG Report. For your convenience, we are including these comments in the below table. Please address these two comments by March 25, 2025.

Table: Select comments from Ecology’s Nov. 25, 2024 letter

|   |
|---|
| <p><b>Comment 4: Copies of reference documents and records.</b> Provide Ecology a copy of all referenced documents and records per the Agreed Order. VIII. Terms and Conditions, G. Retention of Records.</p> <p><u>Discussion:</u> Ecology is requesting all 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.</p> <p><u>Resolution:</u> Provide Ecology the requested documents and records</p>   |
| <p><b>Comment 24: References, additional comments.</b> This comment provides an expanded request and clarity to our earlier comment on providing references and records. We need to have copies of reports that are not locked up, and we need copies of communications between the PLP and Yakima County for the referenced communications and any unreferenced communications.</p> <p>A) Section 8 References, second reference. Barr Engineering Co. and Fulcrum Environmental Consulting, 2019 Revised Final Remedial Investigation Work Plan, Yakima Mill Site.... Ecology is requesting a non-secured (unlocked) electronic copy of this work plan. We are requesting separate electronic copies of the Fulcrum documents in the Appendices of the work plan.</p> <p><u>Discussion/Resolution:</u> Provide the requested unlocked electronic work plan and standalone files of the Fulcrum summaries of site history Appendix B1 and B2.</p> <p>B) Section 8 References. Please provide a copy of the following referenced documents.</p> <p>a) Yakima County, 2023a. Cascade Mill Parkway Phase 3 Improvements Project, 95% Design Project-RC 3446-6 Plan Set...</p> |

Allan Gebhard  
Barr Engineering  
March 13, 2025  
Page 3 of 3

- 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.

#### **Updated schedule of activities**

Please provide an updated schedule of activities. Ecology is requesting an updated schedule of activities in advance of a meeting with Barr, and not later than March 25, 2025.

We sincerely appreciate your cooperation in this request, with the goal of moving this site forward towards cleanup. We reserve the right to add additional comments as appropriate. 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,



John Zinza  
Cleanup Project Manager  
Toxics Cleanup Program  
Central Regional Office