



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office
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March 11, 2025

Sent via email

Molly Hanson, Holden Remedial Project Manager
US Forest Service, Pacific Northwest Region (R6)
215 Melody Lane
Wenatchee, WA 98801

RE: Ecology Comments on Draft Holden Mine Site, 2025 PSVP Monitoring Activities Memorandum

- **Site Name:** Holden Mine
- **Site Address:** Chelan County
- **Ecology Facility Site ID No.:** 338
- **Ecology Cleanup Site ID No.:** 4414
- **UAO, EPA Docket No:** CERCLA-10-2012-0127

Dear Molly Hanson:

Thank you for providing the State of Washington (State) (represented by the Department of Ecology (Ecology)) an opportunity to review and comment on the above-referenced document in accordance with part XIII of the Unilateral Administrative Order. Below are Ecology's comments on the Draft Holden Mine – 2025 PSVP (Performance Standards Verification) Monitoring Activities Memorandum dated February 6, 2025, received on February 19, 2025.

In regard to our comments, Ecology is providing an opinion of the presented activities in the draft ACAR in meeting state laws. Our opinions expressed in this letter are consistent with our authority under the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW¹. In addition to MTCA, our opinions are expressed consistent with our authority under Chapter 90.48 RCW², the Water Pollution Control, and Chapter 90.70 RCW³, the Puget Sound Water Quality Authority Act.

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

² <http://app.leg.wa.gov/RCW/default.aspx?cite=90.48>

³ <http://app.leg.wa.gov/RCW/default.aspx?cite=90.70>

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Ecology is available to review our comments with the US Forest Service as needed. Please distribute our comments to the Respondent as well as to the other members of the Government Team. Please advise Ecology on the USFS schedule for finalizing the, 2025 PSVP Monitoring Activities Memorandum.

Ecology Comments/Discussion/Resolution: Below are Ecology's comments, and as appropriate associated discussion and expectations about the resolution:

Comment 1: General. Ecology expects results will be compared to updated State WQ standards.

Discussion: This is a reminder of how Ecology views applying updated rules to cleanup projects.

Resolution: In the subsequent ACAR, compare results to current State WQ criteria.

Comment 2: Page 4 of 7, under the heading "Hydrogeological Measurements", provide an explanation on why the well is being decommissioned.

Discussion: An explanation would provide the reader with some clarity on why the decommissioning is happening.

Resolution: Provide an explanation.

Comment 3: Table 1. Provide a comprehensive table that identifies sampling locations and the changes over time.

Discussion: Ecology realizes that this table is a snapshot of changes for this year. However, it is challenging to grasp the magnitude of the changes, without a comprehensive picture of the changes in the PSVP program.

Resolution: Provide a comprehensive table of the changes to the PSVP sampling program. This could be a separate deliverable.

Comment 4: Table 1. RAO 2: Sediment. What happens when ferricrete is encountered?

Discussion: Do the ferricrete surveyors break up ferricrete if it is encountered?

Resolution: Clarify how ferricrete is addressed if encountered in the field.

Comment 5: Table 1 and Figures. Correlate discontinued and removed sampling locations and equipment identified in Table 1 with the figures.

Discussion: The text and table refer to changes that should be also presented in the figures. A good example of depicting changes is the symbol for the well-point decommissioning in Figure 2b.

Resolution: Depict changes and locations not sampled on the figures or provide a separate figure with the changes proposed.

Figures 1, 2, and 3. General comment. Ecology is requesting that the historical 1937 Railroad Creek channel be added to all figures.

Discussion: This historical feature helps in understanding the location of some of the sampling locations.

Resolution: Add the 1937 Railroad Creek channel.

Comment 6: Figure 3, West Area Seep Survey and Sampling Locations and Ferricrete Monitoring Stations. Clarify the legend symbol to show where seep samples are being collected.

Discussion: The figure title and the empty triangle in the legend indicate that samples are being collected in 2025, however, one does not find the empty triangle in the figure at a location. So, I assume all the shaded triangles are where samples are being collected.

Resolution: Provide some clarity to the legend regarding the relationship between the shaded triangles and the empty triangle in the legend. Add a symbol to indicate where samples are not being collected in this upcoming event.

Comment 7: Figure 3, West Area Seep Survey and Sampling Locations and Ferricrete Monitoring Stations. Expand the “Ferricrete Monitoring Zone” to include a new “Ferricrete and Iron Staining Survey Monitoring Station” co-located with sampling location RC-27.

Discussion: The ROD requires addressing the adverse effects of ferricrete. Since significant staining is encountered at the discharge downstream of the wetland, it should be added to this monitoring program.

ROD References:

- Page 2-47, Section 8.1 Remedial Action Objectives. RAO # 2. Reduce exposure to contaminants of concern in sediment, (including the adverse effects of ferricrete on aquatic life in Railroad Creek) to protect aquatic life and comply with ARARs.

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- Page 2-68, Section 9.1.5 Remedy Components Common to Alternatives 11M, 13M, and 14. Under the heading “Long-Term Monitoring”.

Resolution: Expand the “Ferricrete Monitoring Zone” and add a new “Ferricrete and Iron Staining Survey Monitoring Station” at sampling location RC-27.

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,

A handwritten signature in black ink, appearing to read "John Zinza", with a stylized, cursive script.

John Zinza
Cleanup Project Manager
Toxics Cleanup Program
Central Regional Office