



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 11, 2025

Tom Graham
Director EHS, North America
JELD-WEN, Inc.
2645 Silver Crescent Drive
Charlotte, NC 28273 USA

Re: Request for soil sampling at the following site:

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

Dear Tom Graham:

As discussed in an email to you dated March 4, 2025, the Washington State Department of Ecology (Ecology) is requesting soil sampling to characterize dioxins/furans in shallow soils in proximity to northeast and southwest shorelines of the peninsula associated with the Jeld Wen Site (Site). Currently, dioxin/furans (DFs) in shallow soils are suspected, based on the site conceptual model, two soil samples collected during the Remedial Investigation (RI) with results above background, and in particular, results from recent sampling of materials found within stormwater piping within the central part of the peninsula with elevated concentrations of DFs.

Ecology considers the DFs in soil near the proposed sediment remedies to be a data gap that needs to be filled prior to completion of the Engineering Design Report (EDR) for sediments. In addition, filling this data gap is anticipated to help to ensure institutional controls are implemented for the long-term protection of the sediment remedy.

Ecology understands that the National Marine Fisheries Service (NMFS) will likely be requesting an opinion from Ecology as to whether proposed shoreline improvements are needed for Model Toxics Control Act (MTCA) purposes (i.e. protection of the proposed remedy). Ecology cannot answer that question definitively without the requested additional data.

The following scope of work is suggested:

- Collection of approximately 20 soil samples at 10 locations for analysis of DFs along the northeast and southwest shorelines of the peninsula. These soil samples could presumably be collected via hand auger, though a power corer may be needed at the surface where paving is present. Sample depths of zero to six inches and one to two feet are suggested. The deeper sampling depth of one to two feet is suggested since some cleaner fill could have been placed on top of historical surface soils impacted by DFs, and since shoreline erosion would not only affect the shallowest soils.

Ecology requests that you submit a plan map showing proposed sampling locations for our review and comment. We advise collection of these samples as soon as possible, since the results could affect the ongoing Joint Aquatic Resources Permit Application (JARPA) processes.

Based on the results of the sampling, Ecology may adjust the definition of the Site boundary presented within the Cleanup Action Plan (CAP) dated August 2023. Unless results are significantly different than anticipated, we anticipate that the cleanup plans presented within the CAP would not be changed. Ecology notes that the CAP dated August 2023, discusses the need for an environmental covenant (EC) at the Site:

Institutional controls to be implemented under this CAP include the recording of a restrictive covenant on the property with the County Assessor's Office. This covenant will include restrictions on soil digging and placement of drinking water wells in the property. The performing PLPs shall develop a soil management plan to control potential exposure risks posed by direct exposure to residual subsurface contamination and to protect the integrity of the remedy.

As previously mentioned, Ecology appreciates the ongoing efforts of the Jeld Wen team to clean up the Site.

Sincerely,



Frank P. Winslow, LHG
Toxics Cleanup Program
Headquarters Section

cc: Erik Gerking, Port of Everett
Scott Miller, SLR Consulting
Nathan Soccorsy, Anchor QEA, LLC
Ron Woolworth, W&W Investments
Coleman Hoyt, Heidelberg Materials
Erik Snyder, Ecology