



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

April 2, 2025

Nicky Moody, Project Manager
AECOM Technical Services, Inc.
888 SW 5th Ave., Suite 600
Portland, OR 97204

Re: Expectations for working together

Dear Nicky Moody:

Welcome to the team. The Department of Ecology (Ecology) looks forward to working with you to clean up the Boise Cascade Mill site (Site), referenced below. This site is under an Agreed Order, with much work already accomplished. We realize project transition is always challenging. Therefore, the purpose of this letter is to share our expectations for the cleanup process, and our commitment to working collaboratively with you.

Site Name	Boise Cascade Mill
Site Address	805 N 7 th St, Yakima, WA 98901
Cleanup Site ID	12095
Facility/Site ID	450
Agreed Order No.	DE 13959

An understanding of Ecology's expectations will be helpful as you transition into the role of the Project Coordinator.

Ecology is committed to cleaning up and restoring this site in accordance with our state's cleanup law. With collaboration and a good working relationship, I believe we can make the cleanup process more efficient, timely, and effective.

Every cleanup site has a project manager. Your Cleanup Project Manager is John Zinza. He will be your point of contact for everything related to this site. John can be reached at 509-225-0304 or by email at john.zinza@ecy.wa.gov.

Nicky Moody, Project Manager
AECOM Technical Services, Inc.
April 2, 2025
Page 2

Expectations

To aide you in transitioning into the Project Coordinator role, we have enclosed General Standards of Work for managing cleanup projects. Each site is unique, so these standards should complement your professional judgment.

As you are aware, this project is under formal orders as established in Agreed Order DE 13959. This legal agreement sets a schedule of meetings and a timeline for you to submit key documents. We expect the PLP's consultant to work with Ecology staff and promptly resolve technical issues.

In general Ecology's goal is to review documents and respond to you within the timelines specified in the Order. The quality and completeness of the submitted deliverable expedites our review. Our goal is to have approval within two review cycles.

Site deliverables

We look forward to learning the status and schedule for receiving deliverables, including but not limited to a revised Conceptual Site Model – Data Gaps Report (CSM-DG Report). Ecology can share what we liked and what improvements are necessary to facilitate reviews. The CSM-DG Report offers a good starting point to begin this process. For example, while we appreciate the level of detail, the overall structure focused on parcel boundaries versus the nature and extent of contamination. This structure as well as other factors can contribute to a long review with extensive comments. Ecology's desire is to improve the initial submittals and limit the back-and-forth of document review.

Introductory meeting with new project coordinator

Please schedule an online Teams meeting so we can introduce ourselves to you. This Teams meeting will allow Ecology to share our view of the progress of the project and the improvements necessary to facilitate progress towards cleanup. During the introductory meeting with you, we can also discuss the future in-person meeting with the PLPs you discussed in your letter. Please provide dates and times you are available to John Zinza who will schedule the Teams meeting. We look forward to working with you to protect Washington's people and environment in a way that improves the quality of life for all of us.

Nicky Moody, Project Manager
AECOM Technical Services, Inc.
April 2, 2025
Page 3

Sincerely,



Valerie Bound
Section Manager
Central Regional Office
Toxics Cleanup Program

Enclosure: Toxics Cleanup Program General Standards of Work for Formal Cleanup Sites

cc: Derek Threet, Office of the Attorney General
Ecology Site File

Toxics Cleanup Program

General Standards of Work for Formal Cleanup Sites

These General Standards of Work established by Ecology's Toxics Cleanup Program apply to formal cleanup sites where Ecology is the lead agency. Ecology hopes completing the Remedial Investigation and Feasibility Study (RI/FS) will take no longer than two (2) years. Ecology also hopes completing the Final Cleanup Action Plan, Engineering Design Report, and remedy construction, should take no longer than three (3) years.

Ecology expects that the RI/FS will be conducted under an Agreed Order and the cleanup will be conducted under an Agreed Order or Consent Decree.

1. Communications

- Ecology and potentially liable persons (PLPs) will together identify stakeholders, local governments, and Tribes and plan for their involvement as appropriate.
- Clear expectations around communications will be established at the start of the project.
- Ecology requires that PLPs select a single point of contact (POC) to lead communications with Ecology. The POC will keep all PLPs informed of site discussions, changes, activities, etc., and will solicit and facilitate input to Ecology.
- Ecology will schedule the following key project meetings at specific points during the project (identified in the Scope of Work).

2. Project Documents

- The Ecology CPM will review key documents (RI Work Plan; RI/FS Report; etc.) within the review timelines outlined in the Order.
- Key documents will be reviewed by Ecology for:
 - Technical accuracy, objectivity, completeness, and clarity.
 - Compliance with the order or decree, MTCA, and other applicable regulations.
- Once tasks required by the Agreed Order are complete, Ecology will issue a letter documenting that the requirements of the Agreed Order have been satisfied.

3. Data Collection

- As time allows and during significant events, the Ecology CPM will participate in field activities so that decisions are made in real-time, with observations and discussion through the POC.

- Where appropriate, expedited site assessment techniques should be used to characterize the nature and extent of contamination (for example, source areas and down-gradient plume boundaries). This includes:
 - Existing information from previous site investigations; other nearby sites; and regional soil, geologic, and groundwater studies.
 - Field screening instruments (where possible).
 - Direct-push technology to sample soil and groundwater (as geologic conditions permit).
 - On-site mobile laboratories or off-site fast-turnaround analyses.
- Frequent and regular data reports will facilitate approval of key project documents (the RI Work Plan, RI/FS Report, etc.) after a single review cycle.
- Data reports should be informal, containing only information necessary for effective discussions between Ecology and the PLP/consultants. Include:
 - Figures showing sampling locations and currently known character and extent of contamination.
 - Field observations.
 - Laboratory sheets.
 - Tables of analytical results.
- Discuss data interpretations with Ecology as data sets are completed to facilitate mutual understanding of site conditions and data gaps.
- PLPs are required to submit sampling data into Ecology's Environmental Information Management (EIM) system. This should occur as soon as the data has been validated and accepted by Ecology and before key documents are submitted. Ecology data coordinators will assist as needed.

4. Keeping the Project Moving

- Look for activities where the RI and FS work can be performed concurrently.
- Delays or problems in getting permits should be communicated promptly; Ecology may be able to assist in moving the permit process forward.
- Disagreements about technical matters (site characterization) or financial matters (cost recovery) will be resolved through discussions:
 - A meeting will occur within 10 days of being requested by Ecology or the PLPs.
 - If no agreement is reached within 10 days following the meeting, the dispute resolution provisions of the Agreed Order will be followed.

- A new Ecology CPM assigned to a site will take no longer than fifteen (15) working days for the transition. Previously approved and agreed-upon work plans, schedules, reports, and protocols will remain.
- At the end of the RI/FS there will be a debriefing meeting to discuss what went well, what could have gone better, and to acknowledge completion of this phase of project work.