

From: [Winslow, Frank \(ECY\)](#)
To: ["Kristin Anderson"](#)
Cc: [Ron Woolworth](#); [Tom Graham](#)
Subject: Jeld Wen - Stormwater Clean Out in Central Area
Date: Friday, May 2, 2025 12:44:41 PM

Hi Kristin,

Thank you for the call today. It is Ecology's understanding from your report and our conversation that the stormwater lines within the central area of the Jeld Wen peninsula have been cleaned out to the extent practicable. There are several stormwater lines that could not be cleaned out due to collapse features, and temporary mechanical plugs were placed on those lines. The August 2023 Cleanup Action Plan (CAP) stipulated the cleanout of the stormwater lines and the work was conducted under a work plan. It is Ecology's understanding that the work proposed within that work plan was completed.

Language from the CAP is as follows:

Stormwater system cleanup

JELD-WEN performed an assessment of the stormwater system as part of the source control evaluation (SLR, 2019). SLR's "Summary of Source Control Evaluation to Assess Data Gaps for Completion of the Remedial Investigation (RI)/Feasibility Study" stated that "[i]t appears that the storm lines have not been serviced or cleaned for several years and many of the catch basins and stormwater lines were partially or completely filled with sediment, debris, and/or stagnant water. Several of the lines were completely blocked with sediment or debris, which made tracing of those lines unsuccessful. Several of the catch basins were filled with sediment and/or vegetation and did not allow sufficient drainage at the time of [the assessment]."

The RI included the finding that marine sediments were contaminated near the stormwater outfalls. Therefore, as part of source control, the performing PLPs must remove and dispose accumulated sediment and/or debris from stormwater systems including but not limited to stormwater pipes, catch basins, vaults and manholes prior to marine sediment cleanup action. In addition, Ecology recommends repairing damaged and/or deteriorated stormwater structures to prevent or reduce infiltration of upland fill material and/or groundwater into the stormwater system. If recontamination of marine sediment is observed after sediment cleanup during post construction monitoring, Ecology will require an investigation for possible causes of sediment recontamination. This investigation will focus on stormwater system pathway in addition to other potential causes.

After the remainder of stormwater lines on the peninsula have been cleaned out, we anticipate that the lines that could not be cleaned out will likely be addressed through permanent plugging and through institutional controls memorialized within an environmental covenant. It is our understanding that Jeld Wen's consultant will be performing additional work at the Site to ensure that the above CAP requirements are met throughout the Site. Ecology notes that Jeld Wen's consultant SLR has indicated that they are still reviewing the work done in the central area. It is important that Floyd Snider continue working with SLR, as needed, to ensure SLR has the information that they need to complete the closure of these lines. This may include ensuring that prior to placement of aggregate in the demolition area, that if there are any locations where permanent plugs need to be installed, that they be well marked and accessible.

As mentioned, we suggest that Floyd Snider advise W&W Everett Investments with respect to ensuring stormwater compliance at the Site. Stormwater compliance is not my area of expertise; however, others have raised concerns regarding stormwater compliance at the Site (such as pumped discharge of stormwater direct to marine waters in response to ponding). I have made enquiries with stormwater regulatory entities, but have not yet heard back from them on this question. Stormwater compliance also becomes a question with respect to planned demolition of structures or parts of structures, prior to the Jeld Wen team performing cleanup in upland areas.

Thanks, Frank

Frank P. Winslow, LHG

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From: Kristin Anderson <Kristin.Anderson@floydsnider.com>

Sent: Friday, May 2, 2025 9:31 AM

To: Winslow, Frank (ECY) <fwin461@ECY.WA.GOV>

Subject: quick call re: Jeld Wen site?

External Email

Hi Frank,

I was hoping to connect with you today on one thing regarding the Jeld Wen site. Is there a good time to give you a call?

Thanks!

Kristin Anderson, LHG Associate Principal, Senior Geologist (she/her)

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