



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

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

May 12, 2025

Sent via email

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

RE: Holden Mine Site Five-Year Review – State Interview Questions

- **Site Name:** Holden Mine
- **Site Address:** Chelan County, WA
- **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 participate in the Five-Year Review. Provided below are Ecology's responses to the state and local considerations interview questions from Appendix C of the EPA's "Comprehensive Five-Year Review Guidance" (OSWER 9355.7-03B-P).

1. What is your overall impression of the project? (general sentiment)

Ecology reply: Ecology appreciates and values the USFS's hard work in leading the effort to complete the cleanup work at this site. Ecology is looking forward to the construction of the Phase 2 remedy. Given the time to initiate Phase 2, the government team may benefit from evaluating what is working and what can be improved in our processes. This comment is offered and meant to be given as a supportive and respectful gesture to the lead agency.

2. Have there been routine communications or activities (site visits, inspections, reporting activities, etc.) conducted by your office regarding the site? If so, please give the purpose and results.

Ecology reply: During our weekly one-on-one meetings, the USFS informs the State of progress and upcoming activities, primarily related to the government team meetings and submittals received from the PRP.

Due to the remoteness of the site, Ecology does not engage in routine site visits.

3. Have there been any complaints, violations, or other incidents related to the site requiring a response by your office? If so, please give details of the events and results of the responses.

Ecology reply: The recent PSVP – ACAR processes allowed Ecology to evaluate if state Sediment Management Standards (SMS) were met. Ecology expressed concerns about the 2020 sediment sampling event, specifically:

1. The reliability of the laboratory analysis of sediment bioassays.
2. Inaccurate interpretation of the SMS rule and data reporting.
3. The decision to discontinue sediment sampling.
4. Inappropriate use of the SMS chemical criteria to determine if the site impacted by mining activities was in compliance with the SMS rule.

In response to our concerns, the USFS worked with Ecology and the PRP to make adjustments to ensure the sediment sampling, analysis, and data interpretation were appropriate and in compliance with the SMS rule, which is identified in the ROD as an ARAR.

4. Do you feel well informed about the site's activities and progress?

Ecology reply: In general Ecology is well informed about the site activities and progress with recognition that the remedy is between phases and not yet complete. Ecology anticipates that the USFS will continue to inform Ecology at the current acceptable level during the construction of phase 2 and beyond. This is especially important to Ecology regarding determinations about meeting state regulations.

5. Do you have any comments, suggestions, or recommendations regarding the site's management or operation?

Ecology reply: Ecology is focused on determining if the site meets state regulations to protect human health and the environment. Ecology requests that the government team develop a process that allows Ecology to interact with both the government team and PRP to determine if changes in state regulations may impact protectiveness of the remedy. This is a concern because recently the PRP's consultant noted in one of their performance reports that they would not use updated state criteria to determine compliance with state regulations in order to be consistent with past PSVPs and the ROD:

Molly Hanson, USFS, R6
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“In September 2024, Ecology adopted revisions to WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington for several metals (aluminum, cadmium, copper, and zinc) evaluated at the Site. For consistency with other post-Phase 1 PSVP results and the ROD, these new criteria were not used for evaluating the 2024 results.” Reference: Performance Standards Verification 2024 Annual Compliance Assessment Report, Page 1-5. 1.3.2 Surface-Water Based Criteria, Paragraph 3.

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