



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 8, 2025

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

Re: Ecology Comments on the Pre-Remedial Design Investigation Report - Marine

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:

Thank you for submitting the Pre-Remedial Design Investigation Data Report, Marine Areas of Jeld Wen Site, dated April 2025 (hereinafter referred to as the Marine PRDI report). The following are Ecology's comments on that report.

Comment #1 – Section 1.2.4 Marine Sediment Remediation Levels

Footnote 3 mentions “wood debris in marine sediments is likely related to historical log rafting, log storage, and lumber processing operations”. The assumptions in this statement have not been investigated enough to include in the data report as a “likely” source of the wood waste, but could include language such as “wood debris in marine sediments may be related to historical log rafting...”

Comment #2 – Section 1.4 Pre-Remedial Design Investigation Objectives

The section states “primary objectives to inform the lateral extent of contamination for remedial design...”

Section 1.4 of the final PRDI Work Plan stated:

This Step 2 PRDI WP will do the following:

*...Describe the data needs and process for collecting additional subsurface sediment chemical concentration data to inform the **vertical** extent of contamination for remedial*

design of dredge/excavation prisms within the refined SMAs to achieve complete removal of areas exceeding RELs within SMA-3 and a small portion of SMA-2 within the Knoll Area, or to inform engineered cap design [emphasis added].

We suggest revising the text as follows:

The section includes “primary objectives to inform the lateral **and vertical** extent of contamination for remedial design...”

Comment #3 – Section 2.2.3 Knoll Area

The last sentence at the end of the section references South Shoreline instead of Knoll Area (this section pertains to the Knoll Area). Please correct as appropriate.

Comment #4 – Section 2.3 Investigation Implementation Elements

The section states:

The investigations conducted to implement the Step 1 and 2 PRDIs are detailed in the Step 1 PRDI Work Plan (Anchor QEA 2023) and Step 2 PRDI Work Plan (Anchor QEA 2024), respectively. Both PRDI Work Plans were reviewed and approved by Ecology.

Ecology notes that the Step 1 PRDI workplan was approved conditionally by Ecology due to time constraints but a final work plan was not fully approved before sampling began.

Comment #5 – Section 2.3.1 and 2.3.2 Surface D/F, PCB and cPAH Delineation

These sections mention that some of the samples met with refusal (did not reach the target depth) but do not explain how that affected the data from Step 1. Please expand these sections with discussion of how many samples met refusal out of the total number of samples for each area and the implications of these shallow refusals.

Comment #6 – Section 3.1 Surface Sediment D/F and PCB Delineation

When discussing sample refusals please include discussion of South Shoreline refusals requiring additional sampling in Step 2 in order to characterize the lateral extent of contamination and the Logway having limited refusals which did not require additional samples for characterization.

Comment #7 – Figure 3- DFs in Sediments in Logway Area

As previously mentioned, this figure is not sufficiently readable. Please prepare inset maps 3a, 3b, and 3c for the western, central, and eastern parts of the logway area, with data scaled appropriately for these areas.

Please provide these maps to Ecology as a pdf submittal.

Comment #8 – Figures 5 & 6 – DFs and PCBs in the Knoll Area

Please provide a map with the overlay of the SMA3 and SMA2 areas for DFs and PCBs. Please provide this map to Ecology as a pdf submittal.

Comment #9 – Figures 7 & 9 – CPAH SWAC and SMA Delineations

Please prepare maps 7a, 7b, 7c and 8a, 8b, and 7c for the Logway, South Shore, and Knoll areas. Please provide these maps to Ecology as a pdf submittal.

Comment #10 – Section 3.7 – Geotechnical Analyses

It is currently unclear to Ecology how the geotechnical results will be used to develop cleanup design within the EDR. Removal of the bulkhead within the logway clearly results in a risk to the slope that rises to the road along the logway south shore. Ecology requests clarification of the geotechnical decision process that will inform design development within the EDR. This clarification can be provided via separate email.

Closing

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: Josh Morman, Ecology
Scott Miller, SLR Consulting
Nathan Soccorsy, Anchor QEA, LLC