STATE OF WASHINGTON
**DEPARTMENT OF ECOLOGY**
PO Box 47600 • Olympia, Washington 98504-7600 • 360-407-6000

June 12, 2025

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

**Re: Definition of the Jeld Wen Site and Site Boundaries**

| | |
|---|---|
| **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:

The Model Toxics Control Act (MTCA) defines the term Site as follows in WAC 173-340-200 as follows:

> *"Site" means the same as "facility."*
>
> *"Facility" means (a) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, vessel, or aircraft, or (b) any site or area where a hazardous substance, other than a consumer product in consumer use, has been deposited, stored, disposed of, or placed, or otherwise come to be located.*

In implementation of MTCA, Ecology Toxics Cleanup Program (TCP) considers a "Site" to be where contamination above MTCA cleanup levels is or has been found. The Final Cleanup Action Plan (CAP) dated August 2023 defined the Jeld Wen Site in Section 1.2.2, Site Boundary, as follows:

> *Under MTCA, a site (or facility) is an area where a hazardous substance has come to be located. As such, the nature and extent of contamination in the soil, soil vapors, and/or groundwater defines an upland site's boundary. More specifically for the Jeld Wen Site, the upland Site boundary includes areas of contamination above cleanup levels of dioxins/furans and cPAHs in soil, naphthalene in soil vapors, and dioxins/furans, naphthalene, and total PCB congeners in groundwater. Figure 6 shows the geographical areas where contamination was found above cleanup levels and defines the extent of upland Site boundary.*

> *Similarly, the nature and extent of contamination in the sediment defines the marine area Site boundary. More specifically, the marine Site boundary includes sediment contaminated with PCBs and dioxins/furans above sediment management standards. Figure 3 shows the geographical areas where contamination was found above sediment management standards and defines the extent of marine Site boundary.*

CAP Figure 6 showed three areas where cleanup levels were exceeded in upland areas: the dioxin/furans (DFs) cleanup area, the creosote cleanup area, and areas with polychlorinated biphenyls (PCBs) in groundwater near the Knoll above the groundwater-to-surface water-based concentration. CAP Figure 3 showed areas with sediments with contaminants exceeding cleanup levels based on data collected during the Remedial Investigation (RI) phase of the project. Since the CAP was finalized in August 2023, additional data have been collected including:

- Pre-remedial design investigation (PRDI) uplands data refining the areas of the dioxin/furan cleanup area and the creosote cleanup area.
- PRDI sediments data refining the boundaries of the sediment management areas (SMAs) delineated within the CAP.
- Uplands DFs in shallow soil data collected in April 2025 near the northern and southern shores of the peninsula. These data were collected in response to a letter from Ecology dated March 11, 2025.

Of particular importance to the definition of the Jeld Wen Site are the DFs in shallow soil data. These data (table, figure, and laboratory analytical report) were submitted to Ecology on May 30, 2025 and are attached to this letter. A total of 23 soil samples were collected from 9 locations at depths ranging from 0.5 to 5.0 feet below ground surface. Of these samples, eight (35%) had concentrations of DFs exceeding the background concentration of 5.2 pg/g (the cleanup level to be applied within the DF cleanup area).

The DFs in shallow soil appear to be highly variable spatially, and no clear spatial trend was found. The DFs in shallow soil are believed to originate from atmospheric deposition of DFs that resulted from historical burning of salt-laden wood waste materials. Such burning reportedly occurred at multiple locations, hence identifying specific sources for DFs in soil in a given area can be challenging. The one clear conclusion that can be drawn is that there is a reasonable probability of finding DFs in shallow soil throughout the peninsula. **Hence, Ecology must conclude that the Jeld Wen Site boundary includes the entire peninsula.**

Ecology is in the process of identifying appropriate next steps to address this finding. It is important to ensure that these DFs in soil do not result in exposure to human or ecological receptors. The August 2023 CAP include discussion in Section 3.2.1 of institution controls memorialized within and environmental covenant (EC) to manage any remaining contamination following cleanup in the DF and creosote cleanup areas:

> *Institutional controls to be implemented as part of 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 on 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.*

*Engineering controls will be necessary at the Site where contaminants are left in place. This is necessary so that the Site still qualifies for Terrestrial Ecological Evaluation exclusion. West Marine view drive and associated sidewalk will prevent direct exposure to contaminated soil. In addition, the property owner will maintain the Site's paved surface as engineering control to prevent ecological exposure. If a building is constructed and/or occupied, engineering control will also be necessary to prevent vapor intrusion.*

Ecology has not yet made any determination as to whether or not institutional controls memorialized within an EC will be sufficient to manage risks from the newly identified DFs in shallow soils. MTCA requires permanent solutions to the maximum extent practicable, so a disproportionate cost analysis (DCA) may be needed prior to selecting the appropriate alternative for the DFs in shallow soils. It is also possible that additional characterization may be needed to support a DCA for this concern.

Of most critical importance is ensuring that there are no human exposures via direct contact (e.g. dermal contact or inhalation of dust) or continued migration of contaminated soils to the marine environment (such as within suspended solids), both in the short and long-term. Ecology plans to continue working with the Jeld Wen team as well as the property owners to ensure both short and long-term protectiveness is achieved at the Site.

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