



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, Washington 98504-7600 • 360-407-6000

June 12, 2025

Ron Woolworth
W&W Everett Investments, LLC
PO BOX 973
Anacortes, WA 98221
vintinvest@comcast.net

Re: Stormwater Management on the W&W Everett Investments, LLC Properties

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 Ron Woolworth:

We are writing to you as the representative for W&W Everett Investments, LLC, the owner of Snohomish County parcels 29050700100400 and 29050700400100. These parcels comprise a portion of the Jeld Wen cleanup site. As discussed in a letter dated June 12 to Tom Graham with Jeld Wen, recent data have been provided to Ecology which update the definition of the Site Boundaries that were presented within the Cleanup Action Plan (CAP) dated August 2023. Ecology now considers the cleanup Site to now include the entirety of the peninsula, since dioxin/furans (DFs) may be present at concentrations above background in shallow soils throughout the peninsula. Ecology has received a sampling report showing dioxin/furans above cleanup levels are present in shallow soil throughout the peninsula. The results show it is likely not possible to predict where contamination is without extensive sampling of the entire uplands area, therefore the boundary of the Site is now the entire peninsula.

These DFs in shallow soil present a concern on your property both with respect to preventing contact with these soils, and in preventing stormwater than could contain contaminated suspended solids from reaching the marine environment. We understand that the majority of your property is paved, although some pavement may be in rough condition, and the northwestern part of parcel 29050700100400 (reportedly under contract with Heidelberg Materials) is unpaved (now covered with aggregate following building demolition in that area).

Ecology has been told that pumping of ponded water to the marine environment has taken place on your property. **Discharge of untreated waters that have potential for contamination concerns would be a serious concern.** We advise that you work with your environmental consultant to ensure that stormwater is appropriately managed at your properties.

Ecology Toxics Cleanup Program (TCP) made enquiries with our Water Quality Program to better understanding National Pollution Discharge Elimination System (NPDES) permitting requirements. Ecology TCP does not have expertise on NPDES permitting requirements; however, it is our understanding that storage of equipment would not generally trigger NPDES requirements. However, other operations such as boatyards, could. We advise that you work with your environmental consultant to ensure that stormwater permitting requirements are met at your properties.

Ecology has received a draft work plan from the Jeld Wen team for the cleanout of existing stormwater lines on your properties. We understand that many of the lines are inoperable and include breaks and collapses. Ecology is recommending to Jeld Wen the permanent plugging of these defunct stormwater lines. Prior to redevelopment of the properties, a new stormwater management system will need to be permitted and installed. We recommend also working with your environmental consultant on how stormwater at the properties should be managed in the interim, between the permanent plugging of the current defunct system, and redevelopment of the properties with a new permitted stormwater management system.

We appreciate the placement of aggregate within the demolition area that is currently reportedly under contract with Heidelberg Materials, although we had understood that the permitted demolition was to leave foundations and pavement in place. Ecology would like to see this area paved as soon as possible to prevent contact with potentially contaminated soils. As stated within the CAP dated August 2023 *"the property owner will maintain the Site's paved surface as engineering control to prevent ecological exposure."* The CAP also stated: *"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."*

Ecology anticipates that the Consent Decree that will govern cleanup at the Site will include additional information on these requirements.

Closing

Please let me know if you have questions regarding this letter and we can schedule a Teams call.

Sincerely,



Frank P. Winslow, LHG
Toxics Cleanup Program
Headquarters Section

cc: Erik Gerking, Port of Everett
Tom Graham, Jeld Wen
Coleman Hoyt, Heidelberg
Scott Miller, SLR Consulting
Nathan Soccorsy, Anchor QEA, LLC
Josh Morman, Ecology