



**STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY**

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June 12, 2025

Coleman Hoyt  
Heidelberg Materials  
7554 185th Avenue NE, Suite 100  
Redmond, WA98052  
[Coleman.Hoyt@Heidelbergmaterials.com](mailto:Coleman.Hoyt@Heidelbergmaterials.com)

**Re: Jeld Wen Site and the Heidelberg Property at 222 W Marine View Drive**

<b>Site Name:</b>	Jeld Wen
<b>Site Address:</b>	300 W Marine View Drive, Everett, WA 98201-1030
<b>Cleanup Site ID:</b>	4402
<b>Facility Site ID:</b>	2757
<b>Agreed Order No.</b>	DE 5095

Dear Coleman Hoyt:

We are writing to you as the representative for Heidelberg Materials, which is operating on Snohomish County parcel 29050700101200 located at 222 W Marine View Drive in Everett (parcel owned by HM Pacific Northwest 1 LLC). 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 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. In addition, we understand that Heidelberg is under contract for the purchase of the northwestern part of parcel 29050700100400. That area, hereinafter referred to as the "central area", is unpaved but is now covered with aggregate following building demolition in that area.

Ecology Toxics Cleanup Program (TCP) made enquiries with our Water Quality Program to better understanding National Pollution Discharge Elimination System (NPDES) permitting requirements. We understand that parcel 29050700101200, which operates as an asphalt mixing plant, is operating under a NPDES general sand and gravel permit. We also understand that a request to modify that permit to include the central area may be forthcoming.

Ecology understands that the NPDES permit does not require monitoring for carcinogenic polycyclic aromatic hydrocarbons (CPAHs), which are commonly associated with asphalt. CPAHs are a site contaminant of concern in sediments adjacent to the property, and it will be important to ensure that CPAHs do not continue to enter the marine environment.

Ecology has received a draft work plan from the Jeld Wen team that includes the permanent plugging of stormwater lines, including within the central area. We understand that many of these 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 central area, a new stormwater management system will need to be permitted and installed. We recommend also working with your environmental team and/or consultant on how stormwater in this area should be managed in the interim, between the permanent plugging of the current defunct system, and redevelopment of the central area with a new permitted stormwater management system.

We appreciate the placement of aggregate within the central area, 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 TCP 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: Tom Graham, Jeld Wen  
Scott Miller, SLR Consulting  
Nathan Soccorsy, Anchor QEA, LLC  
Ron Woolworth, W&W Everett Investments  
Josh Morman, Ecology