



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

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

July 25, 2025

Sent via email

Nicky Moody
Project Manager
AECOM Technical Services, Inc.
888 SW 5th Avenue, Suite 600
Portland, OR 97204

Re: Follow-up to Ecology-PLP Meeting 1 that was held on June 27th, 2025:

- **Site Name:** Boise Cascade Mill
- **Site Address:** 805 N 7th Street, Yakima
- **Facility Site No.:** 450
- **Cleanup Site ID No.:** 12095
- **Agreed Order No.:** DE 13959

Dear Nicky Moody:

First and foremost, the Washington State Department of Ecology (Ecology) would like to thank the Potentially Liable Person (PLP) team for conducting a positive and productive administrative meeting and setting the framework for future technical discussions. We hope this letter is helpful as you provide responses to the proposals outlined in your June 6, 2025, letter. It's important to understand and address our concerns as you move forward with the cleanup process. Our opinions expressed in this letter are consistent with our authority under the Model Toxics Control Act (MTCA), Chapter 70A.305 RCW.¹

Topic 1: Report Structure

We recognize the need for this cleanup to move forward and do not object to your proposal to revise and integrate the East Side Conceptual Site Model and Data Gaps Report (CSM & DG) analysis into the Remedial Investigation Work Plan (RI WP) Addendum.

¹ <https://app.leg.wa.gov/rcw/default.aspx?cite=70A.305>

However, we caution you that we feel that the CSM & DG analysis is critical to ensuring that the RI investigation achieves the desired goal of identifying the sources of contamination; to characterize the nature, extent, and magnitude of contamination; and to assess the threats posed by the contamination to human health and the environment. We encourage you to reach out to us as necessary (and provide us with an early draft as needed to facilitate our review). Since this process is accelerated and out of our preferred sequence, we will not hesitate to express concerns during our review.

Topic 2: Site Boundaries

We appreciate your efforts to understand our needs and requirements related to identifying land previously owned and used as part of the Boise Cascade Mill operations, and ensuring the appropriate understanding of the MTCA site. Please anticipate receiving additional information from Ecology on this matter regarding the site. We appreciate your reception of our information regarding the site being defined by contaminants and not PCULs, as expressed in our June 20, 2025, email discussing the "Site Boundary." We look forward to future figures reflecting our discussions, which will be used to confirm if our direction is understood.

Topic 3: CSM

We look forward to reviewing your revised CSM that covers the entire cleanup site and the additional pathways discussed.

Topic 4: Sediments and Surface Water

The revised figures and CSM will assist Ecology to ensure compliance with State Sediment Management Standards (SMS) and the protection of surface water. The information provided will allow us to start site-specific interaction with our sediment experts, which will benefit and facilitate future reviews. This will be a technical meeting, possibly as part of a workshop.

Topic 5: COPCs

Ecology appreciates the concurrence regarding the Contaminants of Potential Concern (COPCs) and Preliminary Cleanup Levels (PCULs). We would like to schedule a technical meeting, ideally as part of a workshop. We will include our toxicologist to provide detailed compliance information.

Other: MTCA definitions and terms.

Ecology Comment No. 12 and PLP Response. MTCA and SMS use the term "wood waste" when describing wood waste materials originating from the timber industry.



Wood waste materials include: sawdust from mill operations, scraps from mill operations, etc., (see WAC 173-340-747(7)(b)(i);² and Ecology Publication No. 09-09-044 Wood Waste Cleanup: Identifying, Assessing, and Remediating Wood Waste in Marine and Freshwater Environments).³ In ensuring consistent direction, we are requiring that you use the term “wood waste” going forward, versus “log yard material”. You are welcome to qualify the “wood waste” in terms of contamination, origin, etc., as appropriate. However, to clearly communicate regulatory requirements at this MTCA site, we will be using and requiring the term “wood waste”.

Other: Meeting 2 Agenda Item Additions

Please add “additional assessments” to the agenda for the 2nd meeting with Ecology. The Barr March 1, 2022, Revised Feasibility Study Scoping identifies “additional assessments” including a redox study, a sub-slab sampling vapor intrusion study, and groundwater study. Ecology is particularly interested in the redox study, especially with the identification of wood waste on the east side of I-82.

We encourage frequent and open communication as we move forward. Ecology is available to answer questions about compliance and other technical issues. However, note that any decisions will only be provided in writing.

Other: Yakima County

We provided an update regarding Yakima County’s progress on remedial activity in areas where its proposed East-West Corridor Project overlaps the Boise Cascade Mill site. Ecology and Yakima County have had discussions regarding a de minimis Consent Decree. The cleanup work performed by Yakima County will need to meet the requirements for a relationship to the cleanup action under WAC 173-340-430⁴ Interim Actions, including not foreclosing reasonable alternatives for the cleanup action.

Other: Tribal Engagement, Technical Meeting w/Yakama Nation

We will review your responses to the Yakama Nation comments with a goal to drive out the framework for a technical meeting with the Yakama Nation. Please anticipate us getting back to you on this matter. Refer to WAC 173-340-620⁵ Tribal Engagement.

² <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-747>

³ Wood Waste Cleanup: Identifying, Assessing, and Remediating Wood Waste in Marine and Freshwater Environments

⁴ <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-430>

⁵ <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-620>



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Other: Public participation

In your planning for the upcoming remedial work, please anticipate and build into your schedule a public comment period on the RI Work Plan addendum. Refer to WAC 173-340-600,⁶ (13) Remedial Investigation/feasibility study, (a) Public notice of work plan.

Other: PCULs and COPCs

The PCUL and the COPC lists associated with the draft RI report were established through a collaborative effort with Ecology. In going forward in investigating new areas of the Site, the previously established PCULs and COPCs are a starting point (a reference). Additional analytes/chemicals should be added as appropriate in these future investigations to appropriately establish the nature and extents of contaminants.

Available to Meet, Closing and Contact Information

Ecology is available to meet as necessary to further your efforts to remediate the Boise Cascade Mill site. Please include Jenn Lind on all correspondence that is sent to John Zinza. Jenn Lind is assigned as the Cleanup Project Manager of the adjacent Interstate 82 Exit 33A Yakima City Landfill site and works closely to facilitate the management of both sites. You can contact her by email at: jennifer.lind@ecy.wa.gov. If you have any questions about this response and these opinions, please contact me by phone at 509-225-0304 or e-mail at john.zinza@ecy.wa.gov.

Sincerely,



John Zinza, PE
Cleanup Project Manager
Toxics Cleanup Program
Central Regional Office

⁶ <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-600>

