



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office

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

September 10, 2025

Sent via email

Brett Sheffield, P.E., Engineering Manager
Matt Pietrusiewicz, P.E., County Engineer
Yakima County
128 N. 2nd Street, 4th Floor
Yakima, WA 98901

Re: Ecology Response and Request for Meeting with the County, MTCA Cleanup of Hazardous Waste, East-West Corridor Roadway, Yakima

- **Site Name:** Boise Cascade Mill
- **Site Address:** 805 N 7th Street, Yakima
- **Facility Site No.:** 450
- **Cleanup Site ID No.:** 12095
- **Former Orders:** None at this time

Dear Brett Sheffield and Matt Pietrusiewicz:

The Washington State Department of Ecology (Ecology) acknowledges receipt of the Memorandum: Response to Comments on the Draft Initial Investigation Report, East-West Corridor Roadway, Yakima County (August 2025 MFA Memorandum), dated August 27, 2025, and prepared by Maul Foster & Alongi, Inc., and transmitted by the Yakima County (County) on August 28, 2025. After reviewing the contents and positions of the August 2025 MFA Memorandum, Ecology requests that the County meet in person with Ecology as follows:

- Meet at Ecology Central Regional Office in person on Thursday, September 18th, 2025, from 2:00 pm to 3:00 pm.

This in-person meeting will allow Ecology and the County to clarify the County's responsibilities for cleanup under the Model Toxics Control Act (MTCA). As a Potentially Liable Party on the Boise Cascade Mill Site (Site), the County is subject to MTCA requirements for the property it owns east of Interstate 82, which is part of the Site because there is a documented release of hazardous substances in that location. Please advise your legal counsel that our attorney will attend the meeting.

At the meeting, Ecology would also like to discuss issues that continue to impact the county's timeline for the East-West Corridor Roadway project (Project).

These issues include:

- Response time for MFA to address Ecology comments on a draft report. The August 2025 MFA Memorandum received by Ecology on August 28, 2025, was submitted to Ecology a year after Ecology received the DRAFT Initial Investigation Report (II Report), and about 11 months after Ecology submitted comments for the II Report on October 10, 2024 (a 42-day turnaround). Ecology does not control when parties respond to Ecology's comments, but prefers timely responses where Ecology's comments are acknowledged upon receipt and where a schedule is provided for addressing Ecology. Neither of these was received in this case.
- SEPA. Ecology provided comments to the County on the County's SEPA application and determination for the Yakima County Wood Debris Removal Project on May 28, 2025. Ecology followed up with a June 11, 2025, email to County SEPA staff with an Ecology recommendation that the County pause its SEPA review. Ecology has had no follow-up from the County to discuss Ecology's concerns and comments regarding hazardous substances.
- Reporting a Hazardous Substance Release per MTCA. MTCA requires the reporting of releases of hazardous substances to Ecology per WAC 173-340-120.¹ Previous investigations under the County's direction identified releases of hazardous substances, but Ecology has no record of the County reporting a release. These previous investigations are documented in the Geotechnical Engineering and Environmental Report, Cascade Mill Parkway, Phase 3, Yakima County, Washington, prepared by Shannon & Wilson, and dated March 31, 2023. The Shannon & Wilson report includes information that a release of a hazardous substance occurred on the County's property. The report identifies the following information regarding releases of hazardous substances under the Environmental Laboratory Testing heading, starting on page 6 (Note the bolded text is ours):
 - Under the heading 2021 Explorations: "...With the exception of **the GRO detected, the heavy oil-range hydrocarbons and metals, including arsenic, barium, chromium, lead, and selenium, were detected** below available Washington State Department of Ecology (Ecology) Model Toxics Control Act (MTCA) Method A and B criteria (Ecology, 2013).

GRO was detected at a concentration of 1,030 milligrams per kilogram (mg/kg) in the 15.5-foot sample collected from boring B-10-21. The location of this sample is depicted graphically in Generalized Subsurface Profile B-B' (Figure 4).

The detected concentration exceeds the Ecology MTCA Method A soil cleanup level for unrestricted land use of Cascade Mill Parkway, Phase 3 Geotechnical Engineering and Environmental Report 106384-002, March 31, 2023, 7,100 mg/kg.

¹ <https://app.leg.wa.gov/wac/default.aspx?cite=173-340-120>



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Currently, we are unsure of the source of the contamination encountered in boring B-10-21 at that depth.”

Laboratory test results identified gasoline-range petroleum hydrocarbons, toluene, ethylbenzene, xylenes, diesel-range petroleum hydrocarbons, lube-oil-range petroleum hydrocarbons, arsenic, chromium, lead, and cadmium in the soil sampled along the alignment. The identified contaminants were below the Washington MTCA Method A unrestricted cleanup criteria (Ecology, 2013).

- Under the heading 2014 and 2017 Explorations, hazardous substances were identified in soil samples submitted for laboratory analysis.
- NEPA, Appendix A6 Hazmat Report (Hazardous Materials Memorandum prepared by Widener & Associates for WSDOT and dated April 18, 2022). Under the heading “Regulatory Database Review Methodology,” a discussion of the Boise Cascade Mill Site is presented, which appears to be based on researching reports and not on direct interaction with Ecology. We believe that direct interactions with Ecology’s Toxic Cleanup Program, along with the information in the Shannon & Wilson report, would have resulted in the Appendix A6 Hazmat Report, including text that hazardous substances are on the County’s property and that the property is part of the Site.

Again, Ecology’s goal with the proposed meeting is to guide future communications with the County and to clarify the County’s responsibilities for cleanup at the Site under MTCA. We have copied the Yakama Nation (Yakama) on this response in fulfillment of our requirement to engage with the Yakama. We plan on inviting the Yakama to join Ecology at our meeting.

We look forward to your confirming your attendance at the September 18th meeting at Ecology. If you have any questions, please feel free to contact John Zinza at 509-225-0304 or e-mail john.zinza@ecy.wa.gov.

Sincerely,



Valerie Bound
Section Manager
Valerie.Bound@ecy.wa.gov
Central Region Toxics Cleanup Program

cc: Dan Lawler, Assistant Attorney General
R. Elena Ramirez Groszowski, Yakama Nation

