



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

September 8, 2025

Sent via email

Jarred-Michael Erickson, Chairman
Colville Tribes
21 Colville Street
Nespelem, WA 99155

RE: Joint CERCLA/MTCA Formal Cleanup with US Forest Service as Lead Agency for the following Site:

- **Site Name:** Holden Mine
- **Site Address:** Chelan County
- **Ecology Facility Site ID No.:** 338
- **Ecology Cleanup Site ID No.:** 4414
- **UAO, EPA Docket No:** CERCLA-10-2012-0127

Dear Chairman Erickson:

This email is to inform you that the Washington State Department of Ecology (Ecology) represents the State of Washington (State) in the joint federal and state cleanup at the Holden Mine Site (Site). The United States Forest Service (USFS) is the lead for the cleanup and represents the federal agencies, which include the Environmental Protection Agency (USEPA). Ecology's role is to ensure that State cleanup requirements are met. The Site has undergone extensive environmental investigations and actions for more than 25 years, including the substantial completion of the Phase 1 barrier wall in 2018. Currently, the Site is undergoing long-term operation and maintenance of Phase 1 components, and is in the early stages of negotiating a legal agreement with the potentially responsible party for Phase 2 components, primarily consisting of the remainder of the barrier wall. Provided below is a brief overview of Ecology's current understanding of the Site:

- **Site fact #1, Site Background:** The Holden Mine is an inactive underground copper mine formerly operated by the Howe Sound Company from 1937 to 1958, located in the Railroad Creek valley in Chelan County on the eastern slopes of the Cascade Mountains in Washington State. The mine site is located approximately 9 miles west of Lake Chelan and is primarily within the Okanogan-Wenatchee National Forest (except for mining claims owned by Holden Village).

- Site fact #2, Hazardous substances. The Holden Mine Site (Site) includes the entire area impacted by releases of hazardous substances from the mine, primarily from metals originating from past mining activities and acid mine drainage, and petroleum hydrocarbons.
- Site fact #3, Federal Agencies and Regulations. The Site is not on the National Priority List, nor is it identified as a Federal Facility. The United States Department of Agriculture, USFS, and the USEPA represent the federal agency involvement under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The USFS is identified as the lead agency.
- Site fact #4, State Agency and Regulations: The State of Washington, represented by the Department of Ecology, is asserting its cleanup authority under the Model Toxics Control Act (MTCA).
- Site fact #5, Potential Responsible Party (PRP): The Intalco Aluminum Company is identified as the PRP. Rio Tinto is obligated to pay for site cleanup as a result of its corporate transactions.
- Site fact #6, Initial and Remedial Investigations/Feasibility Studies. Investigations and studies are documented in numerous documents and available through the USFS as part of the administrative record.
- Site fact #7, Interim and Emergency Actions: The USFS conducted interim and emergency actions at the site prior to implementation of the Record of Decision (ROD).
- Site fact #8, Cleanup Action: The ROD¹ was executed on January 27, 2012, and includes signatures from the United States Department of Agriculture, USFS, USEPA, and Ecology. Some highlights from and about the ROD are:
 - The ROD identifies the preferred alternative as a fully penetrating barrier wall to be completed in two phases (Phase 1 and 2).
 - The ROD allows the Potential Responsible Party to evaluate if Phase 2 is needed and/or propose an alternative for Phase 2.
 - Phase 1 was declared substantially complete by the USFS in December 2018.
- Site fact #9, Unilateral Agreement Order (UAO):
 - The federal agencies signed a UAO for Remedial Design and Remedial Action on June 25, 2025.

¹ <https://apps.ecology.wa.gov/cleanupsearch/document/8687>

- The UAO identifies the USFS and the USEPA as the “Agencies” with approval authority.
- The UAO identifies that Agencies will coordinate with the State and the Yakama Nation and provide the State and the Yakama Nation an opportunity to comment on documents submitted.
- Site fact #10, Current Site Status:
 - Phase 1 was declared substantially complete by the USFS in December 2018.
 - The PRP acknowledged that Phase 2 is needed and has proposed an alternative to the fully penetrating barrier wall in the form of hydraulic containment.
 - The USFS has invited the PRP to enter negotiations for Phase 2.
 - The USFS is leading the effort for the legal documents and public participation associated with Phase 2 and changes in the ROD.
- Site fact #11, Agency Tribal Participation: The ROD identifies that the Agencies (USFS, USEPA, and Ecology) coordinated with the Yakama Nation on remedy selection.

Ecology has engaged with the Yakama Nation for over a decade to collaborate on the cleanup. Under the recent revision of MTCA, Ecology is pursuing a Tribal Engagement Plan with the Yakama Nation, as outlined in WAC 173-340-620 Tribal Engagement.²

Ecology understands that local Tribes are uniquely impacted by the contamination at sites being addressed under the MTCA, and as such, Ecology values the participation of impacted Tribes in the cleanup process and the expertise the impacted tribes bring to this process.

If the Colville Tribes are interested in engagement, Ecology will set up a meeting (in-person or virtual) to discuss this site and develop an engagement strategy that is meaningful to the Colville Tribes designee(s) regarding this site and future steps.

Ecology desires to explore a common site-specific Tribal Engagement Plan between Ecology and both the Colville Tribes and the Yakama. Ecology recognizes that the common Tribal Engagement Plan may include sections identifying unique engagement requirements with the Colville Tribes and the Yakama Nation.

Ecology has enclosed the following document(s) for the Colville Tribes review and/or comments.

- Tribal Engagement Plan

² <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340-620>

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In order to address environmental and human health impacts as soon as possible, we greatly look forward to your response.

As stated above, we are requesting the Colville Tribes to consider being part of a common Tribal Engagement Plan that includes the Yakama Nation. We believe this common plan will facilitate communications and engagement with the Tribes.

Please contact me at john.zinza@ecy.wa.gov or (509) 225-0304 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Zinza", with a stylized, cursive script.

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

cc: Rebecca Hunt, Natural Resources Director
Rodney Cawston, Environmental Trust Department Director