



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

November 4, 2025

Tom Graham
Director EHS, North America
JELD-WEN, Inc.
2645 Silver Crescent Drive
Charlotte, NC 28273 USA

Re: Jeld Wen – Cleanup Action Plan (CAP) Clarifications

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 Tom Graham:

The purpose of this letter is to provide you with an update and to clarify the requirements of the August 2023 Cleanup Action Plan (CAP) for the Jeld Wen Site. Since the CAP was finalized, additional data has been collected at the Jeld Wen Site, including soil sampling data for dioxins/furans (DFs) in shallow soils. That sampling was conducted in April 2025 in response to a letter from Ecology dated March 11, 2025. The results of the shallow soil sampling were discussed in a June 12, 2025, letter from Ecology to Jeld-Wen and in a Technical Memorandum dated July 17, 2025¹.

The CAP discusses the requirements for cleanup of DFs in soil in an area referred to as the “Woodlife Area”, located near the northeastern corner of the Site. The planned cleanup is targeting a cleanup level of 5.2 pg/g total DF toxic equivalencies (TEQs) based on natural background concentration, in the Woodlife Area.² During remedial investigation of the Site, two soil samples collected outside of this Area had DF TEQ concentrations exceeding this concentration; however, no cleanup was proposed within the CAP for those two locations (5.3 pg/g at location GP-309 at a depth of five feet below ground surface (ft bgs) and 8.3 pg/g at location MW-16 at a depth of 0-12 ft bgs).

¹ SLR. *Technical Memorandum, Updated Conceptual Site Model – Upland Soils/Site Definition, Jeld Wen Site, Everett, WA*. July 17, 2025.

² Ecology. *Final Cleanup Action Plan, page 18, section 2.3.2*. August 2023.

The CAP discussed engineering and institutional controls in Section 3.8, as follows:

Institutional controls to be implemented under this CAP include the recording of a restrictive covenant on the property with the County Assessor's Office. This covenant will include restrictions on soil digging and placement of drinking water wells in the property. 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.

Engineering controls will include maintaining paved areas or clean soil caps that extend to the biologically active zone so that the Site continues to qualify for Terrestrial Ecological Evaluation exclusion.

Since the CAP was written, the DFs in shallow soil have been shown to be more prevalent and at higher concentrations near the shorelines of the former Jeld Wen peninsula than was previously determined, with a maximum concentration of 177 pg/g at location SSB-6 at 1.5 to 2.5 ft bgs. A total of 8 of 18 (44%) of soil samples collected in April 2025 had DF TEQs exceeding the background concentration of 5.2 pg/g, and 7 of 18 (39%) of soil samples exceed the Method B direct contact-based cleanup level of 13 pg/g. The simplified Terrestrial Ecological Evaluation concentration for total Chlorinated dibenzo-p-dioxins from MTCA Table 749-2 is 5.0 pg/g. Ecology has concluded that concentrations in excess of background present a risk to the marine environment (and potentially terrestrial ecological receptors), and concentrations in excess of the direct contact-based cleanup level pose a risk to workers.

Another pathway of potential concern is the soil-to-groundwater-to-surface water pathway. Ecology's CLARC table has a soil-to-groundwater-to-surface water pathway concentration for total DF TEQs of 0.025 pg/g. MTCA does not require cleanup of soils that have contaminant concentrations below background, hence the natural background concentration of 5.2 pg/g would apply for this pathway. Ecology notes that the DFs in soil in the Woodlife Area have much higher concentrations than elsewhere at the Site, and groundwater contamination migration has not been evident in that Area.

Ecology notes that one approach to prevent or reduce groundwater contaminant migration is through preventing groundwater recharge. A paved surface throughout the peninsula that prevents infiltration of precipitation or runoff is expected to effectively mitigate the soil-to-groundwater-to-surface water pathway for the DFs in soil.

SLR's July 17, 2025 Technical Memorandum stated:

In June 2025, Ecology sent a letter to JELD-WEN regarding the definition of the Site, in accordance with Model Toxics Control Act (MTCA), that stated "Ecology must conclude that the Jeld Wen Site boundary includes the entire peninsula." The letter also stated that "a disproportionate cost analysis (DCA) may be needed prior to selecting the appropriate alternative for the [dioxins] in shallow soils."

In response to the letter from Ecology, this memo presents an updated CSM incorporating these new developments, an understanding of the setting and cleanup project objectives, and presents the case that a supplemental DCA is not warranted as

existing controls presented in the CAP are appropriately protective with the clarification regarding the definition/extent of the Site.

Upon further review, Ecology concurs with the above statement and believes that engineering and institutional controls specified within the existing CAP and detailed herein can be sufficiently protective to ensure that exposure pathways for the DFs are fully addressed. Based on the new DFs in soil results, it has become clear that engineered and institutional controls are needed throughout the Site, which includes the entire peninsula.

Engineered Controls at the Site

Engineered controls at the Site are anticipated to include the following:

- Installation and maintenance of paved surfaces to prevent direct contact with subsurface soils by workers or terrestrial ecological receptors.
- Installation and maintenance of paved surfaces to prevent runoff of soil via suspended solids.
- Installation and maintenance of paved surfaces to minimize infiltration of precipitation and runoff.
- Proper design, construction, and operations and maintenance of stormwater features to ensure no soil enters the stormwater system(s).
- Proper design, construction, and maintenance of shoreline armoring features to ensure no soils enter the marine environment.

The majority of the peninsula part of the Site is currently paved, and Ecology understands that plans are in place for the paving of the central part of the peninsula, which is reportedly under lease by Heidelberg Materials. Ecology will need to verify the condition of the paving throughout the peninsula part of the Site.

In addition, long-term cap inspections will be needed for the peninsula part of the Site. Ecology will need to review and approve a cap inspection plan(s) that details the inspection methods and inspection documentation requirements. This plan(s) should also provide for corrective actions in case problems are found with the cap during inspections or routine Site visits.

Environmental Covenant (EC)

Restrictions on activities at the Site that will protect the cap and human health and the environment will need to be memorialized within environmental covenants (ECs) covering the entirety of the Site, which will need to be recorded with the Snohomish County Auditor's Office. The restrictions anticipated to be included within the ECs for uplands parcels are as follows:

- Restriction of land use on the peninsula part of the Site to industrial or commercial purposes in perpetuity.
- Protection and maintenance of the cap (structures and pavement) and notification to Ecology prior to performing any work that could compromise the integrity of the cap.

- Any post-cleanup subsurface work will only be done after prior written approval by Ecology and will be done in accordance with an Ecology-approved soil management plan(s).
- A prohibition on stormwater infiltration systems – any stormwater collection or conveyance systems should be watertight.
- Protection of any stormwater features to prevent soil/solids from entering any stormwater systems.
- Protection of shoreline armoring to ensure that no potentially contaminated soil enters the marine environment.
- A prohibition on any drinking water use of groundwater throughout the Site.

Ecology notes that additional restrictions could be identified during the development of the uplands ECs. An EC(s) is also anticipated for the marine parcels where sediment contamination is present. The restrictions for the marine parcels will focus on protection of engineered and enhanced monitored natural attenuation (EMNR) caps.

Additional Deliverables

The following required project deliverables and requirements for these deliverables are anticipated to be included within the Consent Decree for cleanup of the Site:

- Technical memorandum(s) detailing the existing nature/condition of paved surfaces at the Site, that will include photographic evidence of the current condition of the paved surfaces. Conclusions and recommendations regarding the sufficiency of existing paved surfaces to serve as a cap should be included with this document.
- Documentation of new paving of previously unpaved or inadequately paved surfaces, including, but not limited to, photographic evidence of the new paving.
- Submittal to Ecology for review and comment, a surface cap inspection plan. This plan should provide for periodic field inspections, including photographic documentation of cap conditions. Contingency measures to be applied to address cap concerns should be detailed in this plan. The plan should also include an inspection schedule and response timeframes.
- Submittal of draft Environmental Covenants (ECs) for the properties that comprise the Site. After signing by the Owners and Ecology, the ECs will need to be recorded at the Snohomish County's Auditor's Office.
- Submittal to Ecology of a Soil Management Plan(s) that provides for management of soil when subsurface/intrusive work, such as for utility repairs, is conducted on the upland areas of the Site.

With permitting and design work ongoing, there is a possibility of additional required deliverables within the Consent Decree or its exhibits being identified.

Tom Graham
November 4, 2025
Page 5

Please let me know if you have any questions regarding this letter. Ecology appreciates the ongoing efforts of the Jeld Wen team to clean up the Site.

Sincerely,



Frank P. Winslow, LHG
Toxics Cleanup Program
Headquarters Section

cc: Chris Kramer, SLR
Scott Miller, SLR
Jason Cornetta, Anchor QEA
Nathan Soccorsy, Anchor QEA
Ron Woolworth, W&W Everett Investments LLC
Kristin Anderson, Floyd Snider
Coleman Hoyt, Heidelberg Materials
Erik Gerking, Port of Everett
Susannah Edwards, Ecology
Ryan Hardwick, Ecology
Josh Morman, Ecology