



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office
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November 26, 2025

Kathryn Navarro
Vice President, General Counsel
Simpson Timber Company
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**Re: WA State Department of Ecology Comments on Year 5 Post-Construction
Monitoring Report for the Shelton Harbor/Oakland Bay Cleanup Site**

Dear Kathryn Navarro:

Thank you for submitting the Year 5 Post-Construction Monitoring Report for the Shelton Harbor/Oakland Bay Cleanup Site. The Washington State Department of Ecology has completed its review and have these comments.

1. **Mapping Contours and Regional Background Thresholds-** The current mapping does not incorporate the South Puget Sound Regional Background level of 78 $\mu\text{g}/\text{kg}$ TEQ for cPAHs. This threshold is a site-specific cleanup level and must be reflected in the contour intervals to support meaningful comparisons and cleanup decisions. We also suggest these concentration intervals for cPAH and D/F classification tiers:
 - cPAH Intervals:
 - 0–21 $\mu\text{g}/\text{kg}$ TEQ
 - 21–78 $\mu\text{g}/\text{kg}$ TEQ
 - 78–140 $\mu\text{g}/\text{kg}$ TEQ
 - 140–280 $\mu\text{g}/\text{kg}$ TEQ
 - 280–500 $\mu\text{g}/\text{kg}$ TEQ
 - 500–1000 $\mu\text{g}/\text{kg}$ TEQ
 - >1000 $\mu\text{g}/\text{kg}$ TEQ
 - D/F Intervals:
 - 0–5 ng/kg TEQ
 - 5–19 ng/kg TEQ
 - 19–31 ng/kg TEQ
 - 31–42 ng/kg TEQ
 - >42 ng/kg TEQ

2. **Surface Weighted Average Concentrations (SWACs)**- The report lacks comparative SWAC data from key monitoring events, including:

- Pre-cap sampling (prior to 2017)
- Post-cap completion (2020)
- Current conditions (2024)

Specifically, we request this SWAC table presented below in the slides accompanying the Year 5 Post Construction monitoring report in March 2025 along with the revised maps and the specific concentration intervals described in item 1. This information is critical to evaluate the effectiveness of the sediment caps and to assess long-term contaminant trends. Ecology requests that these SWACs be clearly presented and described in the text.

Area / Year	Dioxin/Furan TEQ SWAC (ppt)	cPAH TEQ SWAC (ppb)
Oakland Bay (2008)	31 ± 5	15 ± 5
Shelton Harbor		
2017	43 ± 6	130 ± 60
2020	32 ± 5	120 ± 50
2024	33 ± 3	210 ± 200

3. **Recommended Next Steps**- Ecology requests a more detailed and actionable description of the recommended next steps. This should include:

- **Sampling Revisions:** For future sampling events, please only provide discrete samples to help identify potential sources areas.
- **Intertidal Point of Compliance-** As indicated in the Remedial Investigation, only a 0-10 cm point of compliance is included. For the protection of clam diggers via direct contact and protection of clams, an intertidal point of compliance is needed. A 45-cm point of compliance is typical. Sample points at this specified depth need to be sampled in future sampling events to achieve this point of compliance.

- **Timeline and Responsibilities-** Provide a clear roadmap outlining expectations, timeline and recommendations with the next periodic sampling event.

We appreciate the effort that has gone into compiling the report and remain committed to working collaboratively toward a complete and protective cleanup. Please revise the report to address the above items and resubmit for further review within 60 days from the time of receipt. Should you have any questions, please contact Ecology's project manager for the Shelton Harbor/Oakland Bay Site, Valerie Chu at 564-669-0298 or valerie.chu@ecy.wa.gov.

Sincerely,



Valerie Chu
Toxicologist
Toxics Cleanup Program
Southwest Region Office

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