



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

March 20, 2026

Rob Webb
Dalton, Olmsted & Fuglevand
1317 Front Street
Leavenworth, WA 98826

Re: Ecology comments on the PRDI Work Plan Addendum_20260304 for the following contaminated site:

- **Site Name:** Weyerhaeuser Mill A
- **Site Address:** 3500 Terminal Avenue, Everett
- **Facility/Site ID:** 1884322
- **Cleanup Site ID:** 2146

Dear Rob Webb:

The Washington State Department of Ecology (Ecology) has reviewed the letter, PRDI Work Plan Addendum_20260304, from Dalton, Olmsted & Fuglevand (DOF). Ecology has made the following decisions regarding the requested revisions:

Ecology approves of the plan to conduct and report data in phases and to analyze all intervals collected for subsurface sediment environmental characterization. Thank you for providing the updated contact list.

Ecology approves switching the project laboratory work to Apex Labs, with some specific notes on the requested methodology changes. The increase in some of the detection limits should not pose an issue since they are still below cleanup levels.

- EPA 7471B to 1631 – This method change was for Mercury analysis. No reasoning was provided for the methodology change. EPA 7471B is Ecology's preferred method for mercury in sediment and we do not approve of changing the methodology. If DOF and The Port of Everett would like to discuss this further and present sufficient reasoning for this change, Ecology is open to discussing.
- EPA 8081B to 8270E – This method change was for Hexachlorobenzene (HCB). No reasoning was provided for the methodology change. This change slightly increased the detection limit for HCB but still provides the needed data, under the cleanup levels of the site. This change is approved.

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- EPA 8270E-SIM to EPA 8270E – This method change applies to Polycyclic Aromatic Hydrocarbons (PAH's) and 2,4-Dimethylphenol. This change is approved.

For the management of excess sediment, Ecology does not approve this request. Planned surface sampling locations are within the site boundaries and may have results above background concentrations. Per Section 4.5.9 of SCUM (Ecology 2025), excess/discarded sediment should be retained in a watertight drum for appropriate disposal onshore. The original PRDI Workplan text regarding excess sediment should be retained.

Sincerely,



Ryan Hardwick
Site Manager
Toxics Cleanup Program
Headquarters Cleanup Section

cc: Amy Hargrove, Ecology
Kevin Kalefern, Ecology
Erik Gerking, Port of Everett
Jacob Kirschner, Port of Everett
Luke Thies, Weyerhaeuser
Lynn Grochala, Floyd Snyder
Tasya Grey, Dalton, Olmsted & Fuglevand
Anthony Cerruti, Dalton, Olmsted & Fuglevand
John Herzog, Dalton, Olmsted & Fuglevand