



**STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY**

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November 21, 2025

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

**Re: Jeld Wen – Ecology Comments on Marine EDR**

|                          |                                                 |
|--------------------------|-------------------------------------------------|
| <b>Site Name:</b>        | Jeld Wen                                        |
| <b>Site Address:</b>     | 300 W Marine View Drive, Everett, WA 98201-1030 |
| <b>Cleanup Site ID:</b>  | 4402                                            |
| <b>Facility Site ID:</b> | 2757                                            |
| <b>Agreed Order No.</b>  | DE 5095                                         |

Dear Tom Graham:

Ecology received on October 27, 2025, your revised draft Marine Engineering Design Report (EDR) dated October 27, 2025. Based on our review of that document and your responses to our September 25, 2025, comments on the draft Marine EDR, Ecology has prepared the following comments. Most of these comments pertain to new information provided within the Revised Draft Marine EDR. Ecology requests the revision of the Marine EDR to address these comments.

**Comment #1 – General Comment**

For future submittals, including the revised Marine EDR Report, in addition to the PDF document and responses to comments, please include a Word document with track-changes version to facilitate Ecology's review.

Also, please provide comment responses in memo rather than table form. Ecology performs document reviews electronically, and tabulated comment responses with small font text can be difficult to review on-screen.

Comment #2 – Page iv, Table of Contents

If possible, please hyperlink Figures and Tables in the Table of Contents.

Comment #3 – Page 15, Section 3.2.1

This section discusses source control activities. Since dioxins/furans in shallow soil are present in shallow soils at the Site at concentrations above background, activities to prevent contaminated or potentially contaminated shoreline soils from eroding into the marine environment should be included as a source control. In addition, removal of degraded asphalt pieces along the shoreline that potentially contain CPAHs should be considered a source control activity. Please mention in this section shoreline stabilization as a source control activity.

Comment #4 – Page 27, Section 6.1

This section may need to be updated, pending discussions with Tribe(s) and regulatory agencies, to minimize impacts to shoreline habitat from shoreline armoring.

Comment #5 – Page 28-29, Section 6.2

Feedback from applicable regulatory agencies and Tribes may necessitate a standalone mitigation plan if on-site compensatory wetland mitigation is required (rather than mitigation bank credits). This section should mention potential need for that plan, which could be a future attachment to the EDR.

Comment #6 – Page 29, last paragraph

Ecology has not seen the referenced draft agreement and therefore committing to purchasing Blue Heron Slough credits should not happen at this time. Additionally, this needs to be discussed with WDFW, USACE, City, and the Tulalip Tribe before any path for wetland mitigation is locked in.

Comment #7 – Page 32, Section 7.5

Will a plan for controlling and minimizing impacts on traffic from truck traffic from the Site be developed? If so, who will develop it and when? Is consultation with/approval from City of Everett required?

Comment #8 – Page 38, in-text table

This table (EMNR material specification) should be reviewed by WDFW and Tulalip Tribe to ensure it is consistent with habitat for key fish species.

Comment #9 – Page 39, Quarry Spall Armor Layer

The Tulalip Tribe has asked that rounded river rock be used as armor rock on logway. Has this been investigated and if so, why was quarry spall ultimately selected?

Comment #10 – Page 44, Archaeological Monitoring

Any state directed MTCA cleanup work requires a cultural resource consultation regardless of if work is done in fill material or not. The JARPA Section 106 may take the place of a cultural resource consultation if tribes are contacted and approve the plan, but Ecology has no evidence of either of these being completed at this time. It is still necessary that this is completed before any groundbreaking activities take place.

Comment #11 – Figure 15, Cross Sections

The cross sections on this sheet are too small to use for detailed analysis of cleanup design. Please split these cross sections into separate figures that each include an index map (or potentially one each for the Logway, South Shore, and Knoll areas). Of particular importance are cross sections A-A' and B-B' (Logway) and C-C' and D-D' (South Shore) which provide detail on the shorelines that have proposed armoring. Have the shoreline slopes shown on these cross sections been verified? Field verification of these slopes may be warranted.

Comment #12 – Figure 15, Cross Section B-B

Cross section B-B' still appears to be filling in waterward on the slope, which likely needs to be permitted. Has this been considered and if so, where can the permitting documents be found?

Comment #13 – Geotechnical Engineering Evaluation, Page 8, Filtration Analysis

Please provide a PDF copy of this paper so that Ecology can review this resource.

Comment #14 – Geotechnical Engineering Evaluation, Page 8, Equation B-1

The design values presented in Equation B-1 are widely accepted criteria for filtering material and are applicable for this project. In the presented Equation B-1: Filter Criteria, Criteria 3 seems to have a typo. It should read  $D_{50(\text{Armor})} < 25D_{50(\text{Base})}$ .

Although the filter criteria are presented, it is not clear how the criteria are applied to the design values. Only values for  $D_{50}$  are presented in Table B-3, Summary of Filtration Evaluation.

The filter criteria, developed by Terzaghi and expanded by USACE, presented in the report are intended to:

- Criteria 1 – ensures the filter retains the base soil.
- Criteria 2 – ensures the filter can remove seepage water quickly.

- Criteria 3 – prevent the segregation of filter material during placement and ensure the grain size curves are somewhat parallel.

Ecology would like to see additional information to support the filter analysis to demonstrate that the material meets these criteria, including:

- Figures summarizing sieve analysis results.
- Figures summarizing the filter gradation applying the stated criteria.
- Summary table of filter design including  $D_{15}$ ,  $D_{50}$ , and  $D_{85}$  value.
- Explanation of any deviations from the stated criteria.

### Closing

Please let us know if you have any questions regarding this letter or would like to schedule a Teams call to discuss these comments.

Sincerely,

A handwritten signature in blue ink, reading "Frank P. Winslow".

Frank P. Winslow, LHG  
Toxics Cleanup Program  
Headquarters Cleanup Section

cc: Todd Gray, Tulalip Tribe  
Todd Zackey, Tulalip Tribe  
Jason Cornetta, Anchor QEA  
Nathan Soccorso, Anchor QEA  
Susannah Edwards, Ecology  
Ryan Hardwick, Ecology  
Josh Morman, Ecology