

Memorandum

To: Ron Woolworth, W&W Everett Investments, LLC
Copies: Frank Winslow, Washington State Department of Ecology
From: Kristin Anderson, LHG, Floyd|Snider
Date: June 16, 2026
Site Name: Jeld-Wen Site
Re: Cap Condition Survey

The following memorandum presents results of the cap inspection requested by Washington State Department of Ecology (Ecology) in accordance with the forthcoming Consent Decree for the Jeld-Wen Site (Site), for a portion of the Site owned by W&W Everett Investments, LLC (W&W). W&W is the current owner of parcel number 29050700100400, which includes the eastern portion of the peninsula where the former Jeld-Wen main manufacturing building was located (eastern parcel). A portion of this parcel is currently leased to Heidelberg Materials (HM; central parcel). HM is also the owner of parcel number 29050700101200 (western parcel). The central and western parcels are managed separately by HM consistent with its current operations and associated stormwater permits.

BACKGROUND

Ecology requested that the eastern parcel be evaluated to identify and address potential sources of contamination to stormwater discharging to the marine environment. In correspondence from and between W&W and Ecology, several potential approaches were identified to address this requirement.

One approach identified by Ecology included completing an inspection of the existing cap, as will be required under the forthcoming Consent Decree, and performing any necessary cap repairs in a timely manner. Ecology indicated that,

“once the sufficiency and integrity of the cap have been demonstrated, ongoing stormwater management practices, such as periodic sweeping and removal of solids, may be adequate to address potential contamination in stormwater runoff.”

Ecology also noted that

“Site activities, including the storage of equipment and materials, present a potential risk for stormwater impacts and should be considered as part of overall stormwater management practices.”

In response to Ecology’s request, a cap condition survey of the eastern parcel was conducted on April 22 and 23, 2026, to evaluate the current condition of the cap and identify areas that may need maintenance or repair. Maintenance and repair of the cap and other recommendations provided in this memorandum will address Ecology’s direction regarding interim stormwater management. It is expected that portions of the eastern parcel will be used for construction support activities during implementation of the cleanup action and thus managed separately under the Construction Stormwater General Permit (CSGP). Ongoing coordination with Ecology to meet the requirements of the CSGP will be performed by Jeld-Wen.

CAP CONDITION SURVEY METHODOLOGY

Field personnel conducted a cap inspection of the eastern parcel on April 22, 2026, between 9:15 a.m. and 4:30 p.m. and April 23, 2026, between 9:15 a.m. and 11:30 a.m. Light rain events occurred on April 22, and the high tide elevation was 9.75 feet mean lower low water (MLLW) at 7:57 a.m. The low tide on April 22 was -1.47 feet MLLW at 3:37 pm. The high tide on April 23 was 8.92 feet MLLW at 8:58 a.m. and low tide was -0.52 feet MLLW at 4:38 p.m.

The cap inspection methodology included delineating the perimeter of each surface area on the eastern parcel and collecting polygons of surface classifications using a GPS. Each polygon was assigned a unique identifier (ID) based upon the nature of the surface condition as shown in Figure 1. Surface conditions were classified into six categories:

- Concrete or asphalt (intact)
- Broken concrete or asphalt (soil visible)
- Gravel
- Exposed soil with no, or minimal, vegetation
- Vegetated area
- Other (e.g., tanks, storage, buildings)

Observations of ponding on paved surfaces were also recorded. For ponding to occur, pavement must be intact, thus preventing infiltration of the collected surface water such that it accumulates on the paved surface.

For areas of exposed soil and broken pavement, field personnel documented estimated percent of bare soil and notable signs of erosion (qualitative observation). Representative photographs were collected for each mapped area, with additional photos of any significant erosion and

transition zones. Refer to Attachment 1 for a summary of key cap inspection photographs. All inspection photographs are presented in Attachment 2.

CAP CONDITION SURVEY RESULTS

Overall, the eastern parcel is predominantly covered by intact concrete or asphalt, comprising approximately 16.6 acres of the total surveyed area (Attachment 1, Photos 1 to 4). Additional ground surface conditions of the eastern parcel, comprising 2.4 acres as summarized in Table 1 below, include broken concrete or asphalt (Attachment 1, Photos 5 to 8), gravel (Attachment 1, Photos 9 to 12), exposed soil with no, or minimal, vegetation (Attachment 1, Photos 13 to 16), fully vegetated unpaved areas (Attachment 1, Photos 17 to 20), and other surface types such as infrastructure and ponding (Attachment 1, Photos 21 to 26). All area IDs are labeled in Figure 1.

Areas of broken concrete and pavement and exposed soil were limited in extent, totaling approximately 0.5 acres combined. These areas were evaluated in the field for signs of erosion, with observations documented qualitatively on field forms (Attachment 2) and supported by eastern parcel photographs (Attachments 1 and 3).

Table 1
Cap Condition Summary

	Concrete or asphalt (intact)	Broken concrete or asphalt (soil visible)	Gravel	Exposed soil with no or minimal vegetation	Vegetated area	Other (e.g., tanks, ponding, buildings)
Total Area (Acres rounded to the nearest 0.1 acre)	16.6	0.3	0.7	0.2	0.4	0.8

Areas of broken concrete/asphalt total 0.3 acres and are labeled on Figure 1 as B1 through B23. Polygons B1-B6, B8, B11, B13-B14, B17-B23 presented erosion indicators, primarily exposed underlying fill material, and sediment accumulation or deposition within the damaged pavement areas. In several areas, the deterioration of the concrete and asphalt surface appeared to contain accumulated surface water, contributing to the formation of shallow depressions and uneven surface conditions. Minor vegetation was present in B2, B3, and B4, suggesting that some of the damaged areas function as localized collection points for stormwater runoff rather than active sources of sediment migration with the potential to reach surface water. Sediment deposits were commonly seen along the margins of broken pavement, indicating that sediment transport has occurred during precipitation events.

Gravel areas throughout the Site were generally observed as flat, stable surfaces used for material storage, temporary stockpiling, or filling potholes along the haul route that was established during demolition of the main manufacturing building on the eastern parcel. Gravel

areas are labeled on Figure 1 as C1 through C20. Polygons C1-C8 and C15-C20 were identified as having the potential to wash out during storm events due to their exposed configuration and lack of containment by berms or curbing. Erosion or migration of gravel from these areas could contribute suspended solids to stormwater runoff; however, the gravel is from a clean quarry source provided by HM and is therefore unlikely to contribute contaminants to stormwater. Polygons C9-C14 were observed to be contained within concrete berms, which are expected to reduce the transport of sediment during precipitation events.

Ponded areas (as shown in Figure 1) with the potential to discharge to surface water include polygons F1, F2, F4, F5, F7, F8, F10, F16, and F17. These areas were generally associated with depressional and impermeable surfaces of the Site where accumulated stormwater could overflow, migrate across impermeable surfaces, or flow toward surface water during precipitation events. The proximity of ponded water to drainage pathways or sloped surfaces increases the likelihood that suspended sediment could be transported in stormwater during precipitation events. A pump was observed at the north truck bay ponding (polygon F1), with piping extending along the north side of the concrete pad, consistent with active water management to maintain driveway access in this area. However, no water flow from the pump was observed during the site visit.

CONCLUSION AND RECOMMENDATIONS

Based on the April 2026 inspection, the cap across the eastern parcel is largely intact and functioning as a barrier to prevent erosion of contaminated soil to stormwater. As exhibited in Table 1, most of the east parcel surface conditions consist of intact concrete or asphalt. Minor areas of disturbance, including broken pavement and exposed soil, were identified but represent a small proportion of the overall east parcel cap area.

Targeted cap repairs and ongoing maintenance are recommended to meet interim stormwater management goals prior to cleanup action construction.

Cap Repairs

- Repair broken asphalt and concrete areas with exposed soil in general accordance with Washington State Department of Transportation principles of roadway crack and pothole repair.¹ Some areas are listed in multiple repair categories to accurately represent the damage in a single mapped area.
 - Areas with cracks to repair using rubberized sealant include B2, B4, B5, and B13.
 - Areas with potholes to repair with full-depth hot mix asphalt (HMA) patch include B2, B6 to B12, and B16 to B23.

¹ <https://wsdot.wa.gov/publications/manuals/fulltext/m51-01/chapter3.pdf>

- Stabilize larger areas of broken asphalt/concrete.
 - Erodible areas to stabilize with HMA pavement include B1, B3, B4, B14, B15, D2, D3, and D5.
- Stabilize areas of gravel with no berm or curb containment.
 - Erodible areas of gravel to stabilize with HMA pavement include C1 to C8, and C15 to C20.
- Stabilize bare soil in unvegetated areas.
 - Bare soil areas to stabilize with hydroseed include D1, D4, D6, and D7.
- Stabilize erodible areas of imported gravel as a general turbidity reduction measure.
 - Implement perimeter turbidity controls such as weighted wattles or temporary berms.
- Prevent ponding to the extent possible.
 - Install an asphalt berm to prevent run-on from West Marine View Drive to the property in the north truck bay area.

Additional maintenance or corrective actions may be necessary if the following conditions are observed in the future:

- Bare soil exceeds 20% within an individual mapped polygon, where 0.1 acre or more of contiguous exposed soil is present, or where there is a significant increase in exposed soil area compared to the initial inspection.
- Erosion indicators include the presence of sediment transport in stormwater.
- Pavement degradation conditions result in visible underlying soil, as well as significant expansion of previously identified broken pavement areas.
- Vegetation concerns include sparse or dying vegetation in previously vegetated cap areas or vegetation loss resulting in more than 20% exposed soil.

Property Maintenance

We additionally recommend integrating the following Best Management Practices mentioned in Floyd|Snider's January 29, 2026, letter:

- Continue using a street sweeper and performing hand sweeping on the concrete pad to remove debris on a regular basis.
- Maintain the existing straw wattles at the perimeter of the main manufacturing building pad.

- Remove solids from the north tuck bay ponded area (it is our understanding that this activity will be performed as part of the Jeld-Wen Site stormwater system cleanout work in preparation for Site cleanup).
- Implement turbidity controls to remove suspended solids from future stormwater.
 - Pump stormwater to a baffled settling tank prior to discharge.

We trust that this memorandum has addressed cap condition concerns and meets stormwater management goals discussed in the March 4, 2026, letter from Ecology.

LIST OF ATTACHMENTS

Table 1 Cap Condition Summary (embedded)

Figure 1 Cap Inspection Survey

Attachment 1 Key Cap Inspection Photographs

Attachment 2 Field Documentation

Figure

- Concrete or Asphalt (Intact)
- Broken Concrete or Asphalt
- Exposed Soil
- Gravel
- Vegetated Area
- Other
- Ponded Area



Notes:
 · Orthoimagery obtained from Nearmap, 2026.

Attachment 1
Key Cap Inspection Photographs



Photograph 1. Polygon A1 facing west from the northeast corner of the Jeld-Wen Site (Site).



Photograph 2. Polygon A1 in southwest corner of the Site.



Photograph 3. Polygon A1 on the south side of F19 building.



Photograph 4. Polygon A1 with stored materials on the southwest side of the parcel.



Photograph 5. Polygon B1 with broken asphalt and debris.



Photograph 6. Polygon B4 with broken concrete/asphalt between slabs.



Photograph 7. Polygon B6 showing gaps in concrete with fill.



Photograph 8. Polygon B7 showing small areas of broken asphalt.



Photograph 9. Polygon C2 with crushed gravel.



Photograph 10. Polygon C4 with crushed gravel.



Photograph 11. Polygon C18: a gravel pile with wood debris.



Photograph 12. Polygon C19: gravel area with stored materials.



Photograph 13. Polygon D1: exposed soil and debris contained within a concrete berm.



Photograph 14. Polygon D4: exposed soil with straw on the surface.



Photograph 15. Polygon D5: exposed soil between asphalt and foundation.



Photograph 16. Polygon D6: exposed soil with trees and debris.



Photograph 17. Polygon E1: vegetated area near the north truck bay.



Photograph 18. Polygon E3: vegetated area along the southeast parcel boundary.



Photograph 19. Polygon E5: vegetated area adjacent to south truck bay.



Photograph 20. Polygon E8: vegetated strip running from east to west.



Photograph 21. Polygon F1: north truck bay ponding.



Photograph 22. Polygon F3: ponding near Outfall 4.



Photograph 23. Polygon F4: ponding near northwest parcel corner.



Photograph 24. Polygon F13: ponding near Outfall 5.



Photograph 25. Polygon F16: ponding over intact concrete.



Photograph 26. Polygon F18: miscellaneous materials, debris, and vegetation.

Attachment 2
Field Documentation

Cap Condition Survey – Field Data Sheet

Project Information

Project Name: WW-Everett

Site Location: 300 W Marine View Dr. Everett WA

Date: 4/22/2026

Weather Conditions: Overcast, raining

Field Personnel: AB, AN

Surface Classification Key

Code	Surface Type	Definition
A	Concrete or Asphalt (Intact)	Continuous, minimal cracking (<15%)
B	Broken Concrete or Asphalt	Deteriorated, exposed base/soil
C	Gravel	Aggregate cover, no significant soil exposure
D	Exposed Soil	Bare soil, erosion visible or likely
E	Vegetated area	>50% vegetated
F	Other	Tanks, ponds, etc

Area / Polygon Data

Area ID	Surface Type	Erosion	% Bare Soil	Notes
A1	Concrete/Asphalt	Yes	<5	Parcel perimeter, impervious area
E1	Vegetated	No	5	Grass/few trees
F1	Water	No	N/A	Ponded water
B1	Broken asphalt/gravel	Yes	70	Exposed fill
B2	Broken asphalt	Yes	50	Soil built up on surface, few plants
E2	Vegetation/gravel	Yes	20	Vegetation, gravel, soil mix, broken asphalt
F2	Water	No	N/A	Ponded water, sheen
F3	Water	No	N/A	Ponded water, sheen, outfall in NW corner
F4	Water	No	N/A	Ponded water
F5	Water	No	N/A	Ponded water
F6	Storage containers, tent	No	N/A	Shipping containers, storage materials
C1	Gravel	Yes	0	Gravel cover, crushed aggregate
F7	Water/containers	No	N/A	Ponded water, metal waste bins
F8	Water	No	N/A	Ponded water

F9	Concrete	No	0	Concrete trench filled with soil and concrete debris
B3	Broken asphalt	Yes	70	Exposed soil, vegetation, catch basin/filter
D1	Soil/wood chip debris	Yes	100	Possible soil/wood chip pile
B4	Broken asphalt	Yes	40	Deteriorating asphalt, some exposed soil and vegetation
D2	Exposed Soil	Yes	100	Exposed fill
B5	Broken asphalt	Yes	20	Broken asphalt, some cracks/breaks
C2	Gravel	No	0	Exposed crushed gravel
C3	Gravel	No	0	Crushed gravel, wood/metal debris
F10	Water	No	N/A	Ponded water, unclear if concrete or soil below
B6	Broken concrete/asphalt	Yes	No	Deteriorating concrete/asphalt. Soil buildup
C4	Gravel	Yes	0	Exposed gravel (fill?) some crushed asphalt
F11	Metal	No	N/A	Below ground open metal box
C5	Gravel	Yes	0	Exposed gravel
C6	Gravel	Yes	0	Exposed gravel
C7	Gravel	Yes	0	Exposed gravel
C8	Gravel	Yes	0	Exposed gravel
B7	Broken asphalt	No	20	Deteriorating asphalt, pockets of exposed soil
E3	Vegetation	Yes	5	Grass
C9	Gravel	Yes	0	Exposed fill, low sat and infiltrates
C10	Gravel	No	0	Exposed fill, depression, berm
C11	Gravel	No	0	Exposed fill, depression, berm
B8	Broken asphalt	Yes	70	Broken asphalt, exposed soil
C12	Gravel	Minimal	0	Exposed gravel fill
C13	Gravel	Minimal	0	Exposed gravel fill
B9	Broken asphalt	Minimal	20	Exposed soil pockets, broken asphalt with water
B10	Broken asphalt/concrete	Minimal	10	Exposed soil, broken asphalt and concrete
B11	Broken asphalt/concrete	Yes	10	Exposed soil, broken asphalt and concrete
B12	Broken asphalt/concrete	Minimal	15	Exposed soil, broken asphalt and concrete
D3	Exposed soil	Minimal	100	Exposed soil in a depression
C14	Gravel	Minimal	0	Exposed gravel/fill
F12	Metal	No	N/A	Metal container storage
B13	Broken concrete	Yes	10	Broken concrete
B14	Broken concrete	Yes	5	Broken concrete
C15	Gravel	Yes	30	Some exposed soil and vegetation
F13	Water	Yes	N/A	Ponded water, sediment buildup

Cap Condition Survey – Field Data Sheet

Project Information

Project Name: WW-Everett

Site Location: 300 West Marine View Dr

Date: 4/23/26

Weather Conditions: Overcast

Field Personnel: AB/AN

Surface Classification Key

Code	Surface Type	Definition
A	Concrete or Asphalt (Intact)	Continuous, minimal cracking (<15%)
B	Broken Concrete or Asphalt	Deteriorated, exposed base/soil
C	Gravel	Aggregate cover, no significant soil exposure
D	Exposed Soil	Bare soil, erosion visible or likely
E	Vegetated area	>50% vegetated
F	Other	Tanks, ponds, etc

Area / Polygon Data

Area ID	Surface Type	Erosion	% Bare Soil	Notes
D4	Exposed soil	Yes	10	Covered in straw
E4	Vegetation	Yes	N/A	Grass and Ivy
E5	Vegetation	Yes	N/A	Lawn/landscaping
E6	Vegetation	Yes	N/A	Lawn/landscaping
D5	Exposed soil	Yes	100	Exposed soil between asphalt and concrete foundation
F14	Water	No	N/A	Ponded water
F15	Water	No	N/A	Ponded water near foundation
F16	Water	No	N/A	Ponded water
D6	Exposed soil	Yes	80	Two large trees, some asphalt
D7	Exposed soil	Yes	80	Exposed soil
E7	Vegetation	Minimal	30	Bermed, some gravel and soil
C16	Gravel	Yes	N/A	Gravel surfacing
F17	Water	No	N/A	Ponded water

C17	Gravel	Yes	20	Gravel/soil, potential asphalt underneath
C18	Gravel	Yes	0	Gravel and wood debris piled on asphalt/concrete
F18	Metal/soil/gravel	Yes	15	Metal debris, vegetation, some exposed soil and gravel
C19	Gravel	Yes	N/A	Some vegetation, metal debris
C20	Gravel	Yes	N/A	Gravel pile
E8	Vegetation	Yes	10	Vegetated strip, some gravel, soil, debris
B15	Broken asphalt	No	30	Asphalt covered in soil and water, low spot
B16	Broken asphalt	No	30	Broken asphalt
B17	Broken asphalt	Yes	100	Exposed fill
B18	Broken asphalt	Yes	100	Exposed fill
B19	Broken asphalt	Yes	100	Exposed fill
B20	Broken asphalt	Yes	100	Exposed fill, ponded water
B21	Broken asphalt	Yes	50	Exposed fill, broken asphalt
B22	Broken asphalt	Yes	70	Exposed fill
B23	Broken asphalt	Yes	100	Exposed fill, ponded water



A1



B1



B10 (1)



B10 (2)



B10 (3)



B11(1)



B11 (2)



B11 (3)



B12



B13



B14



B15 (1)



B15 (2)



B15 (3)



B16



B17



B18



B19



B2



B20



B21



B22



B23



B3 1



B3 2



B4 1



B4 2



B4 3



B4 4



B5



B6 1



B6 2



B6 3



B7 2



B7



B8 (2)



B9 (1)



B9 (2)



B9 (3)



B9 (4)



C1 1



C1 2



C1 3



C10 (11)



C11 (2)



C12 (2)



C13 (2)



C14 (2)



C15 (1)



C15 (10)



C15 (2)



C15 (3)



C15 (4)



C15 (5)



C15 (6)



C15 (7)



C15 (8)



C15 (9)



C16 (1)



C16 (2)



C16 (3)



C17 (1)



C17 (2)



C18 (1)



C18 (2)



C19 (1)



C19 (2)



C19 (3)



C2



C20



C3



C4 1



C4 2



C4 3



C5



C6



C7



C8



C9 (1)



C9 (2)



C9 (3)



CB 1



CB 2



D1



D2 (1)



D2 (2)



D2 1



D2 2



D3 (2)



D4 (1)



D4 (2)



D4 (3)



D4 (4)



D5 (1)



D5 (2)



D5 (3)



D6



D7



E1 1



E1 2



E2



E3 2



E3 3



E3 4



E3



E4 (1)



E4 (2)



E4 (3)



E5



E6 (1)



E6 (2)



E7



E8 (1)



E8 (2)



F1



F10 1



F10 2



F11



F14



F15



F16 (1)



F16 (2)



F16 (3)



F16 (4)



F16 (5)



F16 (6)



F17 (1)



F17 (2)



F17 (3)



F17 (4)



F18 (1)



F18 (2)



F18 (3)



F18 (4)



F18 (5)



F19



F2 1



F2 2



F2 3



F3 1



F3 2



F3 3



F4 1



F4 2



F5 1



F5 2



F6 1



F6 2



F7 1



F7 2



F8 1



F9 1



F9 2



F9 3