



RESPONSIVENESS SUMMARY

Hardel Mutual Plywood site

April 30 – May 30, 2007 Public Comment Period

**Agreed Order for Remedial Investigation, Feasibility Study and
Interim Actions**

**Prepared by
Washington State Department of Ecology
Southwest Regional Office, Lacey, Washington**

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Site Information

Address: 1210 West Bay Drive NW, Olympia, WA

Site Manager: Lisa Pearson, P.E.

Public Involvement Coordinator: Meg Bommarito

The Washington State Department of Ecology (Ecology) and Hardel Mutual Plywood entered into an Agreed Order for an investigation, feasibility study and interim actions at the Hardel Mutual Plywood site.

The agreement requires Hardel Mutual Plywood, Inc. (Hardel) to complete the following:

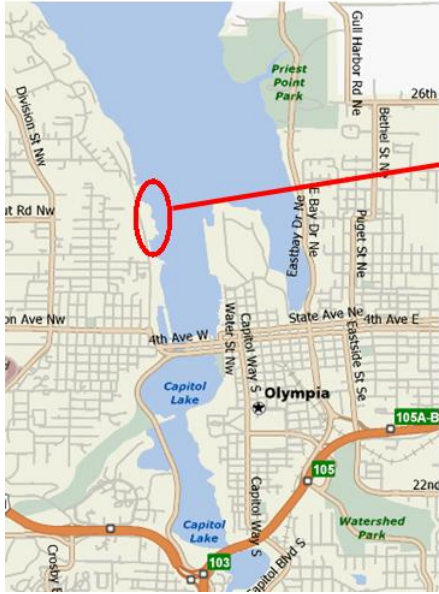
- Remedial investigation to determine the nature and extent of contamination.
- Interim actions to remove free product and reduce contamination and risk to human health and the environment.
- Feasibility study to identify and evaluate cleanup alternatives.

The comment period for this agreed order ran from April 30 – May 30, 2007. Public comments and Ecology's responses are summarized in this document.

Site Background

Hardel operated as a plywood manufacturing business from 1951 until 1996. The company ended operations after a fire severely damaged buildings on site. Those buildings have since been removed and only foundation walls, concrete slabs and drainage systems are still present on the site. Historical site activities resulted in the release of petroleum products to soil and groundwater. Investigations at the site in 2004 confirmed presence of contamination.

Site Map



Comments Received and Ecology Responses

The following comments were received during the April 30 to May 30 public comment period for the Hardel Mutual Plywood site. These comments will be added to the site file and available to the public.

Comment #1: Jerry Parker

Ms. Pearson:

Thank you for the notification of the comment period on the Agreed Order between the Department and the PLPs for Remedial Investigation and Feasibility Study at the Hardel Mutual Plywood site in Olympia.

The fact sheet available on the Ecology website focuses on polycyclic aromatic hydrocarbons. The draft Agreed Order provides additional background regarding the presence of PAHs. However, neither the fact sheet nor the draft Agreed Order notes the possible presence of dioxins at the site. In view of the historic operations at the site, the documentation of extensive dioxin contamination in Budd Inlet, and the asserted link between such contamination and similar historic operations on the Port peninsula, the draft Agreed Order must be amended to require testing for dioxin at the site and at any marine waters and sediments that are part of the site.

Moreover, the fact sheet should explain why the focus of the Agreed Order is limited to the Hardel site. It would seem only logical to include the adjacent Delson Lumber Company site. Cleanup of the Hardel site will be ineffective if pollutants from the Delson site can recontaminate the Hardel site.

Finally, might I suggest that the fact sheet should provide a link to the draft Agreed Order. (http://www.ecy.wa.gov/programs/tcp/sites/hardel/hardel_hp.html) While the order is available thru the search function on the Ecology web site, few who view the fact sheet will realize that additional and critical information is available at the Ecology web site.

Sincerely,

**Jerry Parker
Olympia**

Ecology Response

Hello, Mr. Parker

Thank you for taking the time to be part of the cleanup process at the Hardel site. I thought it would be easiest to respond directly to each comment in the text below, my responses are in **bold**.

Please feel free to contact me again if you have any further questions or comments.

Best regards,
Lisa Pearson, P.E.

Comment #1A

The fact sheet available on the Ecology website focuses on polycyclic aromatic hydrocarbons. The draft Agreed Order provides additional background regarding the presence of PAHs. However, neither the fact sheet nor the draft Agreed Order notes the possible presence of dioxins at the site. In view of the historic operations at the site, the documentation of extensive dioxin contamination in Budd Inlet, and the asserted link between such contamination and similar historic operations on the Port peninsula, the draft Agreed Order must be amended to require testing for dioxin at the site and at any marine waters and sediments that are part of the site.

Ecology Response

The fact sheet and Finding of Facts section of the Agreed Order documents what facts we have collected so far. The remedial investigation will include testing of the sediments for many compounds including dioxin and wood waste.

Comment #1B

Moreover, the fact sheet should explain why the focus of the Agreed Order is limited to the Hardel site. It would seem only logical to include the adjacent Delson Lumber Company site. Cleanup of the Hardel site will be ineffective if pollutants from the Delson site can recontaminate the Hardel site.

Ecology Response

The Model Toxics Control Act (MTCA) is very specific about how to determine the boundaries of a "site". That is, anywhere hazardous substances have come to be located as a result of a facility's operation. If more than one source of contamination is co-mingled (mixed together) at any point, then those 2 sources of contamination are considered one site. The only way we would group Delson Lumber Company and Hardel would be if they had co-mingled contamination, then under MTCA it would be one site. Conversely, if it is determined that pollutants from Delson are traveling onto the Hardel property, then we would consider them one site.

Comment #1C

Finally, might I suggest that the fact sheet should provide a link to the draft Agreed Order. (http://www.ecy.wa.gov/programs/tcp/sites/hardel/hardel_hp.html) While the order is available thru the search function on the Ecology web site, few who view the fact sheet will realize that additional and critical information is available at the Ecology web site.

Ecology Response

Thank you for the suggestion.

Comment #2: Jerry Parker

Ms. Pearson:

Thank you for the response. I fear, however, that you have not answered the question about the adjacent Delson site.

How will you know if the Hardel and the Delson site are "comingled" unless you include the Delson site in the review process? If you do not look, it is unlikely (in the extreme) that you will find.

If this has not been done and will not be done, what is required to provide testing of the Delson site?

Jerry Parker

Ecology Response

Mr. Parker:

If we characterize the contamination on the Hardel site and find there is clean territory (including groundwater) between the two facilities, then we will know the contamination has not comingled. If we continue to find contamination and trace it onto the Delson site and to another source, we will know the contamination is comingled and will have to expand the site to include both sources.

Although, Ecology records show the Delson site was cleaned up and received a "no further action" designation in December of 1997. Of course, if additional data is discovered indicating contamination that has not been addressed we will re-open the site, but we don't expect that at this time.

I hope this clarifies things, please feel free to contact me again at any time.
Thanks for your interest.

Lisa

Comment #3: Heather Trim, People for Puget Sound

Dear Ms. Pearson,

We have reviewed the *Proposed Agreed Order for an investigation, feasibility study and interim action: Hardel Mutual Plywood site (Facility Site ID: # 75128579)*, dated April 2007. The site is located at 1210 West Bay Drive NW in Olympia.

People For Puget Sound is a nonprofit, citizens' organization whose mission is to protect and restore the health of Puget Sound and the Northwest Straits.

The Hardel site is contaminated with oil and diesel petroleum and polycyclic aromatic hydrocarbons (PAHs), including floating free product, in groundwater and soil. In addition phenol, benzoic acid, 4-methylphenol have been found at the site. These

contaminants are toxic to both the health of humans and wildlife and we are pleased that the Department is moving forward with cleanup. The cleanup of this site will further the goal of the Governor's Puget Sound Initiative to restore the health of Puget Sound by 2020.

We offer the following comments:

1. Status. Is the Agreed Order a draft or a final document? Proposed Agreed Orders that we have reviewed recently were not signed, but the Hardel Agreed Order that is posted on the web is a signed document, indicating that this might be a concurrent public notice. We would appreciate a clarification of this issue. We are concerned that similar to the recent dioxin sampling event of Budd Inlet by the Department, public notice is concurrent rather than in advance of proposed activities.

2. Sampling density and depth. We request that the Department require a complete contamination characterization that includes upland soil and Budd Inlet sediment sampling in a grid pattern that provides a fine-resolution density of samples. In addition, we request that samples be collected to "clean" in three directions (i.e., depth, upgradient and downgradient). Our experience with other similar sites shows that sparse sampling patterns and insufficient sampling to depth can miss important hot spots.

3. Removal of subsurface structures. Again, recent experience at similar sites has shown that it is important to require a complete removal of underground pipes, tanks, and underground concrete vaults. Contamination is often found to be concentrated around and below these structures. In addition, the features can provide conduits for groundwater flow to the Sound.

4. Public Participation Plan. At what approximate date will you initiate a public review of the Public Participation Plan?

5. Dioxin Sampling. Given the recent dioxin sampling event in Budd Inlet, we request that additional dioxin samples be taken in the Hardel site sediment as part of this investigation. A full picture of the extent of dioxin contamination is needed in Budd Inlet.

It would be much appreciated if the Department could post existing and upcoming reports, including data reports on the web to ease public review of the site.

Please add People For Puget Sound to the list of parties of record for this site. Thank you for your consideration. If you have any questions, please contact me at (206) 382-7007 or at htrim@pugetsound.org.

Ecology Response

Hello, Heather

Thank you very much for commenting on the proposed Agreed Order with Hardel Mutual Plywood, Inc. I have cut and pasted your comments below in order to address each one.

Comment #3A

Status. Is the Agreed Order a draft or a final document? Proposed Agreed Orders that we have reviewed recently were not signed, but the Hardel Agreed Order that is posted on the web is a signed document, indicating that this might be a concurrent public notice. We would appreciate a clarification of this issue. We are concerned that similar to the recent dioxin sampling event of Budd Inlet by the Department, public notice is concurrent rather than in advance of proposed activities.

Ecology Response

The Agreed Order has been signed to indicate both the Department of Ecology and Hardel are in agreement with the terms. If no substantive comments are received the order will be dated and finalized at the end of the public comment period. The public comment period has been run concurrent with beginning activities, as allowed by the Model Toxics Control Act (MTCA).

Comment #3B

Sampling density and depth. We request that the Department require a complete contamination characterization that includes upland soil and Budd Inlet sediment sampling in a grid pattern that provides a fine-resolution density of samples. In addition, we request that samples be collected to “clean” in three directions (i.e., depth, upgradient and downgradient). Our experience with other similar sites shows that sparse sampling patterns and insufficient sampling to depth can miss important hot spots.

Ecology Response

Ecology is requiring complete characterization of all contamination resulting from historic operations, this includes sediment and upland characterization, and wood waste. In order to define the boundaries of contamination, testing must be conducted until results are below the appropriate cleanup standard.

Comment #3C

Removal of subsurface structures. Again, recent experience at similar sites has shown that it is important to require a complete removal of underground pipes, tanks, and underground concrete vaults. Contamination is often found to be concentrated around and below these structures. In addition, the features can provide conduits for groundwater flow to the Sound.

Ecology Response

In this case, it is best to leave the concrete and subsurface structures in place. The subsurface foundation walls are actually helping to hold the petroleum product in place, away from the tidal area. The concrete covering the site is preventing rainwater from infiltrating through the contamination and spreading it with the groundwater, and is preventing erosion.

Comment #3D

Public Participation Plan. At what approximate date will you initiate a public review of the Public Participation Plan?

Ecology Response:

We will put the Public Participation Plan on the web site today, and you are welcome to provide Ms. Bommarito or me with your comments. We will also highlight it in our next fact sheet.

Comment #3E

Dioxin Sampling. Given the recent dioxin sampling event in Budd Inlet, we request that additional dioxin samples be taken in the Hardel site sediment as part of this investigation. A full picture of the extent of dioxin contamination is needed in Budd Inlet.

Ecology Response:

Sediment sampling is planned for dioxin, phenols, PAH and other constituents listed in the Sediment Management Standards.

Comment #4: Stanley Stahl

Thank you for the notification of the comment period on the Agreed Order between the Department and the PLPs for Remedial Investigation and Feasibility Study at the Hardell Mutual Plywood site in Olympia.

I see the emphasis of your investigation is regarding polycyclic aromatic hydrocarbons and PAHs. However, regarding an even more dangerous contaminant, the now known presence of dioxin furans pervasively detected though tout lower Budd Inlet, the source of which is most logically linked with the historic industrial operations along West Bay and on the Port peninsula. This logical deduction, which can easily be traced in the journals and history books of the City of Olympia, the Port and Dept of Ecology, should have you also testing for the source of that most crippling contaminant.

I notice in the recent SAP testing being done with MTCA funding as mapped out by SAIC, there are three test sites indicated as S5 (Hardell- South), S6 (Hardell), and S7 (Hardell - North). However, these test sites are denoted as Surface Archive, Surface Archive and Surface respectively. Therefore, of the three, two of the three are ending up in the freezer, not being tested, and all three are surface samples, none are core samples, giving only a surface reading of the meager one site being tested. This is not much of a test for such a dangerous contaminant.

I also note on the same SAP test sites S32,33,34 and 35, labeled Reliable Steel, Reliable Steel East, Intertidal beach sample, and NW of turning basin respectively, also call for Surface sampling for dioxins - these are effectively in the same area as the Hardel sites,

but again are surface sampling, and none go any deeper with a core sample to determine if contaminants have built up any deeper from historical industrial activity.

I don't know where the adjacent Delson Lumber Company site is located in relation to the Hardell site, but I understand that to be another potential source of orphan contaminants, and if so could recontaminate the Hardell site, therefore should be investigated as well.

In summary, my comment would be to test for dioxin furans along with the polycyclic aromatic hydrocarbons and PAHs, to test the suspect adjacent sites to avoid recontamination, and to test at varied levels to be thorough about the investigation.

If you only superficially investigate the problem for only a few of the contaminants, at only one geographical location, and at only one level (surface in the case of the SAP being done for dioxin), you are not really solving the contamination problem, but rather superficially making it appear like you are watching out for the public's interests.

Stanley Stahl

Ecology Response

Hello, Mr. Stahl

Thank you for taking the time to provide such detailed comments on the proposed study at Hardel. For convenience, I have provided responses to your comments below in the text. Please feel free to contact me any time if you have further questions or comments.

Best regards,

*Lisa Pearson, P.E.
Environmental Engineer
Toxics Cleanup Program*

Comment #4A

I see the emphasis of your investigation is regarding polycyclic aromatic hydrocarbons and PAHs. However, regarding an even more dangerous contaminant, the now known presence of dioxin furans pervasively detected throughout lower Budd Inlet, the source of which is most logically linked with the historic industrial operations along West Bay and on the Port peninsula. This logical deduction, which can easily be traced in the journals and history books of the City of Olympia, the Port and Dept of Ecology, should have you also testing for the source of that most crippling contaminant.

Ecology Response

The emphasis of the investigation is petroleum, PAHs, dioxin, and phenol compounds. Due to rigorous sediment management standards, there are also a number of other hazardous constituents that will be tested for in site sediments such as metals and polychlorinated bi-phenyls (PCB). The

Agreed Order lists the facts that have been collected so far, that is why the PAH are mentioned in the order.

Comment #4B

I notice in the recent SAP testing being done with MTCA funding as mapped out by SAIC, there are three test sites indicated as S5 (Hardell- South), S6 (Hardell), and S7 (Hardell - North). However, these test sites are denoted as Surface Archive, Surface Archive and Surface respectively. Therefore, of the three, two of the three are ending up in the freezer, not being tested, and all three are surface samples, none are core samples, giving only a surface reading of the meager one site being tested. This is not much of a test for such a dangerous contaminant.

Ecology Response

The Budd Bay study being done currently is a broad overview of a large area to determine where more acute investigation needs to be done. Some samples are tested immediately and then others are put in the freezer. This way, if something of concern is found in the first sample, another sample can be analyzed to further assess the situation without having to send someone back to the field to collect more soil.

Comment #4C

I also note on the same SAP test sites S32,33,34 and 35, labeled Reliable Steel , Reliable Steel East, Intertidal beach sample, and NW of turning basin respectively, also call for Surface sampling for dioxins - these are effectively in the same area as the Hardell sites, but again are surface sampling, and none go any deeper with a core sample to determine if contaminants have built up any deeper from historical industrial activity.

Ecology Response

In the marine environment, it is approximately the top 10 centimeters that make up the "biologically active" zone. For this reason, it is important to test the material the critters are being exposed to. At Hardel, the sediments will most likely be cored through 2 biologically active zones, so approximately 20 centimeters. If wood waste is encountered it will also have to be characterized, since it is hazardous to the marine environment.

Comment #4D

I don't know where the adjacent Delson Lumber Company site is located in relation to the Hardell site, but I understand that to be another potential source of orphan contaminants, and if so could recontaminate the Hardell site, therefore should be investigated as well.

Ecology Response

Hardel has to completely characterize the boundaries of all contamination from their property, if Delson is leaching contaminants onto the Hardel property this study should reveal that pathway. According to the Model Toxics Control Act (MTCA) if contamination from the two operations is mixed together, then we will have to make them one site.

Comment #4E

In summary, my comment would be to test for dioxin furans along with the polycyclic aromatic hydrocarbons and PAHs, to test the suspect adjacent sites to avoid recontamination, and to test at varied levels to be thorough about the investigation.

Ecology Response

Yes, we are testing for dioxin and other marine toxins listed in the Sediment Management Standards and if co-mingled contamination is determined the site will be expanded.

Comment #4F

If you only superficially investigate the problem for only a few of the contaminants, at only one geographical location, and at only one level (surface in the case of the SAP being done for dioxin), you are not really solving the contamination problem, but rather superficially making it appear like you are watching out for the public's interests.

Ecology Response

The goal of the RI/FS is to completely characterize all contamination associated with past operations on the Hardel property. Only then can the most efficient and effective remedy be implemented.

Comment #5: Harry Branch

Greetings Ecology Folk:

I noticed today that work is being done at the Old Delson Lumber site. This work includes grading by heavy machinery that is spreading airborne dust. Has this site been assessed for contamination? If not why is the adjacent Hardel site being assessed but not Delson?

Sincerely,

Harry Branch

Ecology Response

One comment was prepared to respond to all three comments submitted by Harry Branch. Please see Comment #8 for the response.

Comment #6: Harry Branch

I just spoke with Lisa Pearson at Ecology. As I understand it here's Ecology's rationale:

The site is currently being assessed for petroleum product and easy stuff. Dioxin in offshore sediments is being fingerprinted to determine whether dioxin all comes from Cascade Pole or not. This is possible because Cascade Pole has known chemical characteristics. If dioxin in sediments doesn't all match Cascade Pole then other sites such as Hardel will be assessed for dioxin.

I said that it's critical that we find the sources and that I'd be surprised if Cascade Pole was the only source given the history of the waterfront and the spacing of high concentrations along West Bay and that I hope Ecology will stand in there and see the process through. She agreed. I also said that characterization may be more complex than we think...that dioxin can come from unknown historical sources and that (for example) expecting the only source from Hardel would have been the fire may be wrong. She didn't agree or disagree but said the process may take years. I wondered why we don't just test for dioxin at Hardel and get more of the same explaining. It may just come down to cost.

Ecology could ultimately blame it all on Cascade Pole and not conduct any shoreside sampling. That would certainly tidy up the development process. I'm not a chemist and I don't know how valid such an assumption would be but I do think it would be an assumption. Worth watching.

Harry

Ecology Response

One comment was prepared to respond to all three comments submitted by Harry Branch. Please see Comment #8 for the response.

Comment #7: Harry Branch

Lisa Pearson:

In follow up to our phone conversation a couple of days ago:

After some consideration I am troubled by the Hardel assessment plan. I understand from our conversation that the site will not be sampled for dioxin. Current benthic sampling will fingerprint dioxins in the bay to determine whether or not they all come

from Cascade Pole. If it's determined that they do, that will be the end of looking for sources.

I believe this plan is based on several assumptions: (a) There are no dioxins from other sources with the same fingerprint as Cascade Pole. (b) Dioxin would migrate from the Hardel site into the bay in the ten years since the large waterfront industrial fire that smoldered there for days. (c) All types of dioxins present in the bay will be picked up in the benthic samples.

In looking at old photographs of the waterfront there appear to be many potential sources for dioxin contamination along the waterfront. Some of the highest concentrations of dioxin in the 2001 assessments conducted as part of the Cascade Pole remediation were along West Bay. I think a precautionary approach would be to assume there were numerous possible sources for dioxin contamination in the vicinity of Hardel.

No matter how extensive, benthic sampling will not provide a complete characterization of the inlet. Given the extent of dioxin contamination in Budd Inlet I don't understand why an assessment of any site along West Bay would not include dioxin.

Harry Branch

Ecology Response

Hello, Harry

Thank you for taking the time to be part of the cleanup process at Hardel. You are correct; there are other possible sources of dioxin in Budd Inlet besides Cascade Pole. Hardel WILL be testing their sediment for dioxin. At Hardel, the concern is that dioxin could have been created during the structure and sawdust tower fires. When wood is rafted in salt water and then burned, such as when the saw dust tower caught fire, the chlorine from the salt creates dioxin compounds. Also, when the mill structure burned dioxin compounds could have been created. In both these instances, the fire fighting water washed into the bay.

Please feel free to contact me at any time if you have more questions or comments.
Best regards,

Lisa Pearson

Comment #8: Dan Kelly

Hello Lisa, i own and operate heavy equipment and i worked on the site between 92 and 94(i could nail the timing down better if necessary). my company is kelly earthworks inc. i installed a new stormwater transport line approximately 200 ft long through the site. i can attest to the toxicity of at least the area i excavated. the trench was from 2ft to 4ft deep and the entire length was excavated through various depths of wood debris fill. ground water infiltrated into the trench at various velocities throughout the entire length. certain areas emitted noxious odors that made me swoon and feel sick to the point i had to walk away and breath between installing pipe joints. i encountered several old pipes during the excavation which i recommended connecting to my

transport to the main lift station. the pipes were mostly old and rotting. i was not given approval for any addendums.

this is by far the most toxic site i have been in almost 30 years of the excavation business. i was not aware of the sewer system piping. i was not supplied with a comprehensive site plan or stormwater system design. i did walk around the site in an attempt to gain understanding of the stormwater system so i could make recommendations. it appeared to me that all stormwater, groundwater, washwater, and seepage from all slabs ran into the main lift station. i believe the lift station pumped directly to the bay.

please keep me informed of the status of this site as i own property on the ridge above this area, and i am concerned about the future plans for the area.

**thank you for your review.
sincerely, Dan Kelly**

Ecology Response

Hello, Dan

Thank you for taking the time to comment on the Hardel investigation. I appreciate you sharing your experience.

I am interested in talking with you further to see if we can pin down the approximate location where you conducted your work.

At your convenience, please call me at the number below.

We are happy to keep you in the loop. Did you receive the Hardel fact sheet in the mail? If so, then you are on our mailing list for the site and will be automatically included in future updates. If not, please provide me your address and I will make sure your name is put on the mailing list. Also, feel free to contact me at any time with questions or comments.

Thanks,

Lisa

Comment #8A

hi lisa, sorry, i may have dropped the ball here, very busy, received you fax, i could edit, scan and email back with the area i worked in and what i installed.

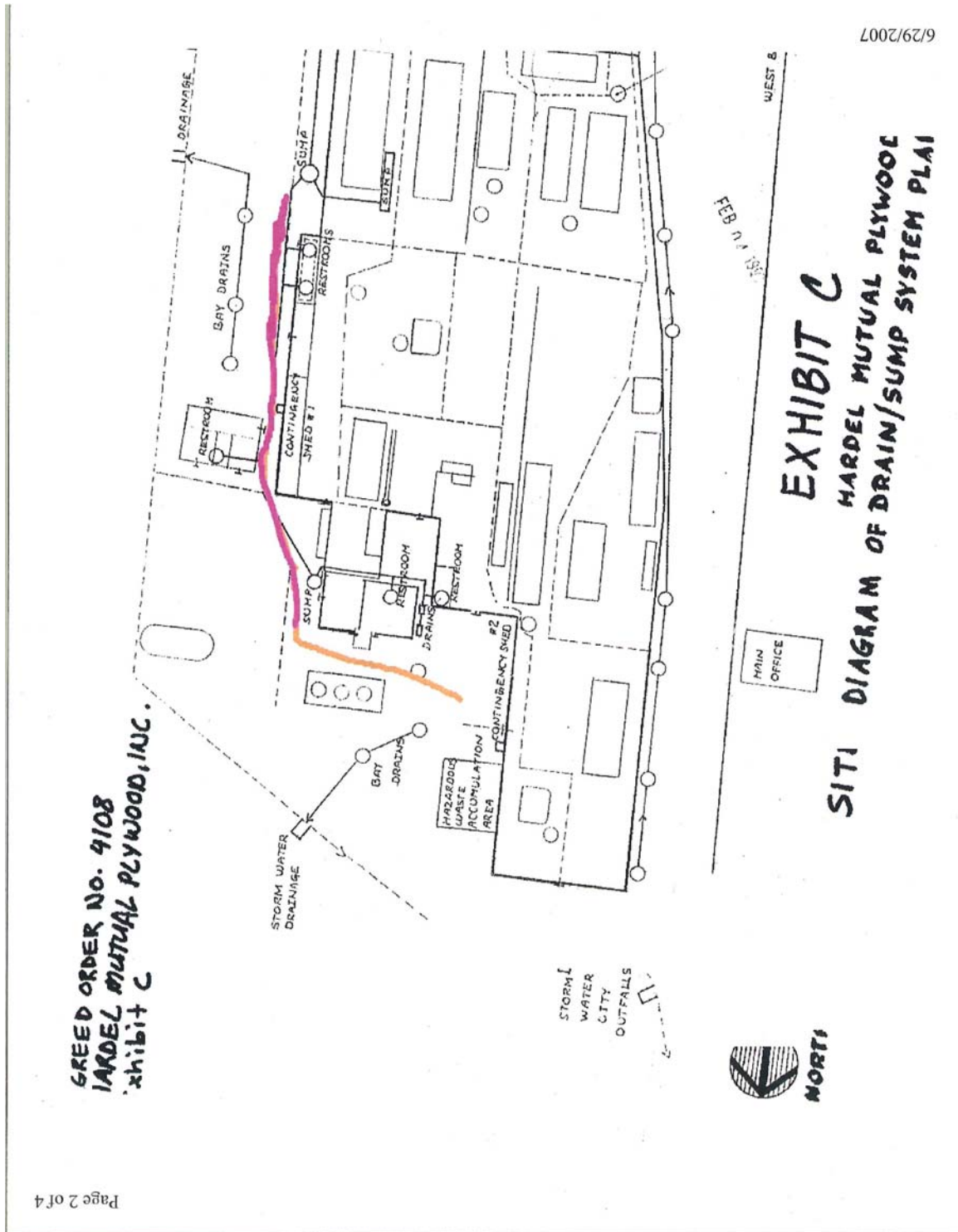
Ecology Response

Hi, Dan
That would be great!
Thanks.

Lisa

Comment #8B

ok, the color line is where i installed the 6" transport. the pink is where i remember the most toxic.



Comment #9: Shannon Soto, Washington State Department of Natural Resources

Dear Ms. Pearson:

The Department of Natural Resources (DNR), pursuant to notice published in the Department of Ecology's site register, and Agreed Order No. DE 4108 for the Hardel Mutual Plywood, Inc. site on Budd Inlet, in Olympia, Washington, requests that it be kept informed of any sampling plan and remedial investigation related to this site.

After reviewing Exhibit D to the Agreed Order entitled, Map Showing Property Boundaries, DNR acknowledges that the site is primarily located on privately-owned tidelands that abut State Owned Aquatic Lands; specifically, harbor area reserved under the State Constitution for purposes of commerce and navigation. Much of those private tidelands are continuously covered by the inlet.

In the Agreed Order, the Department of Ecology (Ecology) concluded that a remedial investigation was warranted based in part on storm sewer outfalls located on site that discharged contamination into Budd Bay. The Agreed Order notes that on March 23, 1989, the Hardel Plywood mill burned causing "storm drains, fire fighting water and sawdust" to run directly into the bay.

The Agreed Order also notes that Ecology conducted two site inspections in 1991:

- **February 20, 1991, Ecology noted the existence of "seven stormwater drains which led to 3 outfalls on Puget Sound (Budd Inlet). The storm drains had no catch basins and the water appeared dark in color with some visible sheen."**
- **April 19, 1991, Ecology noted that "all stormwater runoff was being discharged directly into Budd Inlet without any treatment."**

DNR also notes that in a report prepared by SAIC and published by Ecology entitled, Budd Inlet Sediment Investigation, Olympia, Washington. Summary of Existing Information and Identification of Data Gaps for Sediments that surface sediment sampling should be conducted at the Hardel Plywood site for dioxins and furans.

If, based on the evidence provided in the above documents, sediment sampling is required on State Owned Aquatics Land; DRN is required to issue a right of entry for that sampling and should be considered as an additional requirement under Section P(2) of the Agreed Order.

If you have any questions regarding this letter, please call me at (360) 825-1631 extension 2600.

Sincerely,

Shannon Soto

Ecology Response

Hello, Ms. Soto

Thank you for sending the Department of Ecology comments regarding the potential testing of state owned aquatic lands adjacent to Hardel. If off property testing is required in order to characterize site contamination, we will make sure the Department of Natural Resources is contacted for a right of entry.

Please feel free to contact me with any further questions or comments.
Have a great day.

Lisa Pearson