



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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March 10, 2015

Weyerhaeuser Company  
CH1 J32  
P.O. Box 9777  
Federal Way, WA 98063-9777

Attn: Ken Johnson, Corporate Environmental Manager

**Re: Response to comments**

Dear Mr. Johnson:

On February 13, 2015 the Washington State Department of Ecology (Ecology) sent you written notice regarding the proposed status of Weyerhaeuser Company as a potentially liable person (PLP) for a release of hazardous substances at the following site:

- **Name:** Weyerhaeuser Sawmill Aberdeen
- **Address:** 500 North Custer Street, Aberdeen, WA 98520
- **Cleanup Site No.:** 4987
- **Facility/Site No.:** 1126

We have received your response letter of February 24, 2015, which includes a request for revision to the description of the site in the Ecology preliminary PLP status letter to limit the site to only the Washington State Department of Natural Resources (DNR) Aquatic Lands sublease area.

Ecology disagrees with your request for the following reasons:

- The PLP status letter does not define the geographic extent of the cleanup site. The upland parcel numbers were included in the preliminary PLP status letter as a point of reference to identify the location of the former sawmill complex which was the source of contaminants. The information about site sediment data was provided to illustrate that there were contaminants released from the sawmill complex.
- At this point there is not enough information to confirm or deny whether contaminants released from the sawmill complex are limited to the sublease area, or whether a release

on the uplands may be contributing to the contamination within the sublease area or other areas.

- Upland releases have occurred. The Level I Environmental Site Assessment by PES Environmental, Inc., dated August 13, 2010, includes information about releases from the sawmill complex onto the site uplands and into Shannon Slough upstream of the lease area. These include an underground tank removal near the southeast corner of a former maintenance/machine shop where petroleum hydrocarbons above the Model Toxics Control Act, Method A cleanup levels were left in place in soils; a paint waste spill into Shannon Slough; petroleum-contaminated soils left in place in the vicinity of a removed paint waste underground tank; and report of four underground storage tanks in the northeast portion of the maintenance shop which were reportedly removed but, nothing is known about the condition of soils or groundwater in their vicinity.

Investigations which are currently underway and planned by Grays Harbor Historical Seaport Authority under the Agreed Order will help clarify the boundaries of the site. However, additional information will likely be needed to fully understand the nature and extent of contamination at the site.

Your February 24, 2015 letter also encourages Ecology to name as PLPs the Washington State Department of Natural Resources (DNR), city of Aberdeen, and other companies that historically leased the aquatic tidelands. Ecology has issued a preliminary PLP status letter to DNR. Ecology does not currently have sufficient credible evidence to name the City of Aberdeen or other companies that historically leased the aquatic tidelands as a PLP for the site. We will review any additional information you may be able to provide about the city of Aberdeen or prior owner/operators at the site.

In your letter, you state that Weyerhaeuser Company's accepts PLP status only for the "Sublease Property, as defined in the Consent to Sublease, recorded under Grays Harbor County Auditor File No. 2013-03290099, of the Aquatic Lands Lease No. 22-A02150." Because the Model Toxics Control Act does not include provisions for dividing up sites based on land or lease boundaries, and because, credible evidence exists that releases occurred from the sawmill complex, the PLP status applies to the site overall.

Therefore, based on the information available to date, Ecology finds that credible evidence exists that supports your status as a potentially liable person for the release at the Weyerhaeuser Sawmill Aberdeen Site. On the basis of this finding, Ecology has determined that you are a Potentially Liable Person (PLP) with regard to Weyerhaeuser Sawmill Aberdeen Site.

Your rights and responsibilities as a PLP are outlined in Chapter 70.105D RCW, and WAC 173-340. Ecology is currently negotiating an Agreed Order with the Grays Harbor Historical Seaport Authority for an investigation and alternatives analysis for the sublease area portion of the site. We will contact you in the future about how Ecology intends to proceed with cleanup at the site.

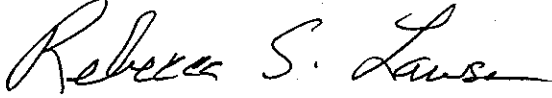
If you have any questions regarding this notice, please contact Joyce Mercuri at (360) 407-6260.

Weyerhaeuser Company

March 10, 2015

Page 3

Sincerely,

A handwritten signature in cursive script that reads "Rebecca S. Lawson".

Rebecca Lawson, P.E., LHG  
Regional Section Manager  
Toxics Cleanup Program  
Southwest Regional Office

By certified mail: 91 7199 9991 7034 8986 1185

cc: Joyce Mercuri, Ecology Cleanup Project Manager  
Ivy Anderson, Ecology Assistant Attorney General