STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

In the Matter of Remedial Action by: JELD-WEN, Inc.	AGREED ORDER FOR REMEDIAL INVESTIGATION/FEASIBILITY STUDY AND DRAFT CLEANUP ACTION PLAN – JELD-WEN No. DE 5095

TO: **Jay W. Russell**
JELD-WEN, Inc.
2751 SW Airport Way
Redmond, OR 97756

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I. INTRODUCTION

The mutual objective of the State of Washington, Department of Ecology (Ecology) and JELD-WEN Inc. under this Agreed Order (Order) is to provide for remedial action at a facility where there has been a release or threatened release of hazardous substances. This Order requires JELD-WEN Inc. to conduct a Remedial Investigation and Feasibility Study (RI/FS) and develop a final Cleanup Action Plan (CAP) for the Site. Ecology believes the actions required by this Order are in the public interest.

II. JURISDICTION

This Agreed Order is issued pursuant to the Model Toxics Control Act (MTCA), RCW 70.105D.050(1).

III. PARTIES BOUND

This Agreed Order shall apply to and be binding upon the Parties to this Order, their successors and assigns. The undersigned representative of each party hereby certifies that he or she is fully authorized to enter into this Order and to execute and legally bind such party to comply with this Order. JELD-WEN, Inc. agrees to undertake all actions required by the terms and conditions of this Order. No change in ownership or corporate status shall alter JELD-WEN's responsibility under this Order. JELD-WEN, Inc. shall provide a copy of this Order to all agents, contractors, and subcontractors retained to perform work required by this Order, and shall ensure that all work undertaken by such agents, contractors, and subcontractors complies with this Order.

IV. DEFINITIONS

Unless otherwise specified herein, the definitions set forth in Chapter 70.105D RCW and Chapter 173-340 WAC shall control the meanings of the terms in this Order.

A. Site: The Site is referred to as JELD-WEN of Everett (formerly known as Nord Door) and is located at 300 W Marine View Drive, Everett, Washington. The Site is defined by the extent of contamination caused by the release of hazardous substances at the property that

includes both upland and sediments. Based upon factors currently known to Ecology, the Site is more particularly described in the Site Diagram (Exhibit A). The Site constitutes a Facility under RCW 70.105D.020(4).

B. Parties: Refers to the State of Washington, Department of Ecology (Ecology) and JELD-WEN, Inc.

C. Potentially Liable Person (PLP): Refers to JELD-WEN, Inc.

D. Agreed Order or Order: Refers to this Order and each of the exhibits to this Order. All exhibits are integral and enforceable parts of this Order. The terms "Agreed Order" or "Order" shall include all exhibits to this Order.

V. FINDINGS OF FACT

Ecology makes the following findings of fact, without any express or implied admissions of such facts by JELD-WEN, Inc.:

A. The Site is located at 300 W Marine View Drive, Everett, Washington. The Site is bounded by the Baywood Property to the North, Burlington Northern Railroad to the East, Maulsby Mudflats to the South, and Port Gardiner Bay to the West.

B. The Site is listed on the Department of Ecology's Hazardous Sites List as "JELD WEN."

C. JELD-WEN, Inc. is the current property owner and previous operator of a facility as defined in RCW 70.105D.020(4). Based on Snohomish County Tax Assessor's office records, the property includes Parcel Numbers: 29050700100400, 29050700101200, 29050700400100, and 29050700401900 (Exhibit B).

D. The JELD-WEN property was a wooden door plant that formerly used petroleum hydrocarbons (TPH), toluene, cleaning solvents, glues, and pentachlorophenol (PCP). In addition to manufacturing wooden doors, this facility also had a machine shop, where much of JELD-WEN's and Nord Door's parts were manufactured. Prior to JELD-WEN's ownership, a portion of this property was used as a pole treating yard (Site Hazard Assessment Summary Report for Nord Door, Parametrix and SAIC, June 1991).

E. On June 27, 1989, the Environmental Protection Agency (EPA) conducted an inspection of the Site (Exhibit C). During their inspection, EPA noted that three out of service pole mounted PCB capacitors were not labeled in accordance with 40 CFR 761.40 and 40 CFR 761.45, and were not stored in accordance with 40 CFR 761.65 (Exhibit C).

F. In 1993, Huckel/Weinmann Associates, Inc. performed an independent site review on the Site. The site assessment disclosed that contamination of Total Petroleum Hydrocarbons (TPH) in excess of MTCA Method A cleanup levels (Exhibit D).

G. In 2006, SLR Incorporated Corp. conducted a soils and groundwater investigation at the Site on behalf of JELD-WEN, Inc. Results of this investigation revealed that the concentrations of TPH, polynuclear aromatic hydrocarbons (PAHs), and toluene both in groundwater and soil at the Site exceeded MTCA Method A cleanup levels (Exhibit E). Benzene concentration in groundwater of 103 ug/L at the Site also exceeded MTCA Method A cleanup levels (Exhibit E).

VI. ECOLOGY DETERMINATIONS

A. JELD-WEN, Inc. is an "owner or operator" as defined in RCW 70.105D.020 (12) of a "facility" as defined in RCW 70.105D.020 (4).

B. Based upon all factors known to Ecology, a “release” or “threatened release” of “hazardous substance(s)” as defined in RCW 70.105D.020(20) and RCW 70.105D.020(7), respectively, has occurred at the Site.

C. Based upon credible evidence, Ecology issued a PLP status letter to JELD-WEN, Inc. dated August 1, 2007, pursuant to RCW 70.105D.040, -.020(16) and WAC 173-340-500. By letter dated August 1, 2007, JELD-WEN, Inc. voluntarily waived its rights to notice and comment and accepted Ecology’s determination that JELD-WEN, Inc. is a PLP under RCW 70.105D.040.

D. Pursuant to RCW 70.105D.030(1) and -.050(1), Ecology may require PLPs to investigate or conduct other remedial actions with respect to any release or threatened release of hazardous substances, whenever it believes such action to be in the public interest. Based on the

foregoing facts, Ecology believes the remedial actions required by this Order are in the public interest.

VII. WORK TO BE PERFORMED

Based on the Findings of Fact and Ecology Determinations, it is hereby ordered that JELD-WEN, Inc. take the following remedial actions at the Site and that these actions be conducted in accordance with Chapter 173-340 WAC unless otherwise specifically provided for herein:

A. **Scope of Work/Work Plan --** JELD-WEN, Inc. shall develop an RI/FS Work Plan (including draft, draft final, and final versions) that includes a scope of work to delineate and quantify (i.e., identify the levels of contamination) the contaminants of potential concern (COPCs) in all media (e.g., soil, groundwater, surface water and sediments). All work shall be completed utilizing professionals qualified to perform the tasks required. Note, all draft final documents for Ecology review may be submitted in redline strikeout or track changes format to facilitate the review. The RI/FS Work Plan will include the elements listed below.

- A site-specific health and safety plan (HASP) and a sampling and analysis plan (SAP), which includes quality assurance/quality control requirements, will be included in the RI/FS Work Plan. These plans shall conform to the requirements specified in WAC 173-340-810 and 173-340-820, respectively.
- The RI/FS Work Plan shall be developed meeting the requirements of WAC 173-350 and should include the sections listed below.
    - **Site Background And Setting** – This section will include detailed descriptions of the following: (1) the property and site operational history (including current and previous ownership), (2) previous investigations, (3) historical sources and releases of contamination (include a review of historical photos and Sanborn Maps), (4) current site conditions (including descriptions of surface features, geology, soil and the vadose zone, surface-water hydrology, hydrogeology, and meteorology), (5) current and future land and

water use (including descriptions of human populations), and (6) the terrestrial/aquatic ecological setting including a description of ecological receptors and potentially threatened/endangered species.

- **Initial Evaluation** – The initial evaluation will consist of the development of a conceptual site model (CSM), identification of preliminary cleanup levels, and an evaluation of the existing analytical data.

- **CSM** – The CSM should describe release mechanisms from the potential primary sources of hazardous substances to secondary and tertiary sources, the exposure media and routes, and the potential human and ecological receptors. The CSM should reflect both current conditions and possible future development in assessing exposure pathways.

- **Preliminary Cleanup Levels** – Based on the CSM, identify appropriate preliminary cleanup levels (e.g., levels established under MTCA [see WAC 173-340-700 through 173-340-760], Sediment Management Standards for Puget Sound Marine sediments, and applicable state and federal laws) under a residential (unrestricted) land use scenario. Note that the cleanup levels must consider all applicable pathways including direct contact (including inhalation), media transfer pathways (e.g., leaching to groundwater, groundwater migration to surface water, etc.), and exposure to terrestrial and/or aquatic ecological receptors.

- **Evaluation of Existing Data** – The existing analytical data should be plotted (as accurately as possible) on both historical and current aerial photographs using georeferencing techniques. Review the sample locations with respect to identified sources and areas where suspected releases (e.g., outfalls, spills, dumping, leaks, etc.) have occurred. All of the existing analytical data collected at the Site should be evaluated in terms of data usability (analytical methods used to evaluate the effectiveness of a cleanup action shall comply

with the requirements in WAC 173-340-830) and screened against the most protective preliminary cleanup levels identified under an unrestricted land use scenario. Both non-detect and detected data should be included in the screening. Identify sample points containing exceedances on a map and also discuss the adequateness of the reporting limits in terms of achieving the preliminary cleanup levels. Chemicals exceeding the preliminary cleanup levels should be identified as COPCs.

- **RI Approach** – Based on the background information gathered, and the evaluation of existing data, discuss by media (e.g., soil, sediment, surface water, etc.) the data required to complete an RI for the JELD-WEN Site. The RI approach should be consistent with WAC 173-340-350 and include any data needed to help identify habitat restoration opportunities. Identify data gaps (e.g., establishment of "natural" background levels for metals according to WAC 173-340-709, characterization of on-site groundwater, etc.) and the overall approach for conducting the RI. The Sampling and Analysis Plan will provide the details on numbers and locations of samples for each media and the analytical requirements.

  The RI field investigation should be conducted in two phases. The first phase of the investigation will be designed to identify the full nature and extent of contaminants in upland and offshore areas. Medium evaluated will include soil, sediment, groundwater, surface water. JELD-WEN, Inc. shall provide Ecology with the results of the Phase 1 investigation so that a determination can be made with regard to whether a Phase 2 investigation is required to define the full nature and extent of contamination. The information provided to Ecology should describe the analytical results of the Phase 1 field activities including the identification of COPCs, the affected media, preliminary cleanup levels, the extent of contamination (plotted on maps), and any data

gaps that need to be filled to define the nature and extent of contamination. A Phase 2 field investigation (if necessary based on Phase 1 results) will be conducted to further define the nature and extent of contamination based on findings during Phase 1.

- **FS Approach** – This section should provide an overview of the methods that will be used in conducting the FS for the JELD-WEN Site. The FS approach should be consistent with WAC 173-340-350 and should consist of the following sections:
  - Establishment of Preliminary Cleanup Levels
  - Delineation of Media Requiring Remedial Action.
  - Development of Remedial Action Objectives.
  - Applicable or Relevant and Appropriate Requirements.
  - Screening of Cleanup Alternatives.
  - Evaluation of Cleanup Alternatives.
  - Evaluation of Habitat Restoration Alternatives[1].
- **Schedule and Reporting** – This section should contain the schedule and reporting requirements for the RI/FS project.

B. **RI/FS Report** – A draft, draft final, and final RI/FS report meeting the requirements of WAC 173-340-350 shall be prepared presenting the results of a remedial investigation regarding the full nature and extent of soil, groundwater, surface water, and/or sediment contamination and provides potential alternatives and a preferred alternative for the

[1] The Site is being overseen by Ecology and work is being done in an expedited manner under the Governor's Puget Sound Initiative. The Initiative focuses on cleaning up contamination as well as restoring Puget Sound. Ecology recognizes that site cleanups can be designed and implemented in a manner that improves habitat values and provides for shoreline restoration in conjunction with remedial actions. While planning the cleanup, and making cleanup decisions, Ecology and JELD-WEN, Inc. will evaluate opportunities to perform remedial actions in a fashion that coincidentally enhances habitat. Elements of the remedial action will be evaluated for restoration opportunities in consultation with Ecology as plans for cleanup are developed.

cleanup of the contamination present at and restoration of the Site. Also the alternatives evaluation and the preferred cleanup alternative must meet the requirements of WAC 173-340-360.

C. **Cleanup Action Plan (CAP)** – Upon the approval of the final RI/FS report, JELD-WEN, Inc. shall prepare a draft CAP in accordance with WAC 173-340-380 that provides a proposed cleanup action to address the contamination present on the Site. The CAP shall include a general description of the proposed cleanup action, results of any remedial technology pilot studies, cleanup standards from the RI/FS report and rationale regarding their selection, a schedule for implementation, descriptions of any institutional controls proposed, and a summary of applicable, local, state and federal laws pertinent to the proposed cleanup action.

D. **Schedules** - JELD-WEN, Inc. shall perform the actions required by this Order according to the following schedule:

- **Draft RI/FS Work Plan** – The draft RI/FS Work Plan shall be due 30 calendar days after finalization of the Agreed Order. This draft will then undergo a 30 day review period by Ecology. During this period of time there will be a concurrent 30 day public comment period regarding the Agreed Order (beginning two weeks after finalization of the Agreed Order).
- **Draft final RI/FS Work Plan** – The draft final RI/FS Work Plan shall incorporate comments submitted by Ecology after the 30 day Ecology review period. The draft final RI/FS Work Plan shall be due 15 days after the Ecology review period. This draft final will then undergo a 20 day review period by Ecology.
- **Final RI/FS Work Plan** – The final RI/FS Work Plan shall incorporate comments submitted by Ecology after the 20 day Ecology review period. This shall be due 15 days after the review by Ecology.
- **RI/FS Study (field sampling)**

- **Phase 1 RI/FS Study** – Begin immediately after the completion and submission to Ecology of the Final RI/FS Work Plan.
  - Phase 1 Field Investigation Results – The Phase 1 field investigation results (as discussed previously under the RI Approach) should be provided to Ecology 15 calendar days after the receipt of all Phase 1 RI/FS analytical data.
- **Phase 2 RI/FS Study (as needed)** – Begin within 21 days after Ecology receives the Phase 1 field investigation results.

- **Draft RI/FS Report** – The draft RI/FS report shall be due 45 calendar days after receipt of all analytical data collected during the RI/FS study. This draft will then undergo a 30 day review period by Ecology.
- **Draft Final RI/FS Report** – The draft final RI/FS Report shall incorporate comments submitted by Ecology after the 30 day Ecology review period. The draft final RI/FS Report shall be due 15 days after this Ecology review period. This draft final will then undergo a 20 day review period by Ecology.
- **Final RI/FS Report** – The final RI/FS Report shall incorporate comments submitted by Ecology after the 20 day Ecology review period. This shall be due 15 days after the review by Ecology. The final RI/FS Report will go to a 30 day public comment period along with the draft final Cleanup Action plan
- **Draft Cleanup Action Plan (CAP)** – The draft CAP is due 45 days after finalization of the RI/FS Report. This draft will then undergo a 30 day review period by Ecology.
- **Draft Final Cleanup Action Plan (CAP)** – The draft final CAP shall incorporate comments submitted by Ecology after the 30 day Ecology review period. This draft final shall be due 15 days after the Ecology review period. Upon

completion, this draft final will then go to a 30 day public comment period along with the final RI/FS Report.

- **Final Cleanup Action Plan (CAP)** –The final CAP shall be due 15 days after the 30 day public comment period.

E. If, at any time after the first exchange of comments on drafts, Ecology determines that insufficient progress is being made in the preparation of any of the deliverables required by this Section, Ecology may complete and issue the final deliverable.

VIII. TERMS AND CONDITIONS OF ORDER

A. Public Notice

RCW 70.105D.030(2)(a) requires that, at a minimum, this Order be subject to concurrent public notice. Ecology shall be responsible for providing such public notice and reserves the right to modify or withdraw any provisions of this Order should public comment disclose facts or considerations which indicate to Ecology that this Order is inadequate or improper in any respect.

B. Remedial Action Costs

JELD-WEN, Inc. shall pay to Ecology costs incurred by Ecology pursuant to this Order and consistent with WAC 173-340-550(2). These costs shall include work performed by Ecology or its contractors for, or on, the Site under Chapter 70.105D RCW, including remedial actions and Order preparation, negotiation, oversight, and administration. These costs shall include work performed both prior (retroactive to June 1, 2007) to and subsequent to the issuance of this Order. Ecology's costs shall include costs of direct activities and support costs of direct activities as defined in WAC 173-340-550(2). JELD-WEN, Inc. shall pay the required amount within ninety (90) days of receiving from Ecology an itemized statement of costs that includes a summary of costs incurred, an identification of involved staff, and the amount of time spent by involved staff members on the project. A general statement of work performed will be provided upon request. Itemized statements shall be prepared quarterly. Pursuant to WAC 173-340-550(4), failure to pay Ecology's costs within ninety (90) days of receipt of the itemized statement

of costs will result in interest charges at the rate of twelve percent (12%) per annum, compounded monthly.

Pursuant to RCW 70.105D.055, Ecology has authority to recover unreimbursed remedial action costs by filing a lien against real property subject to the remedial actions.

C. Implementation of Remedial Action

If Ecology determines that JELD-WEN, Inc. has failed without good cause to implement the remedial action, in whole or in part, Ecology may, after notice to JELD-WEN, Inc., perform any or all portions of the remedial action that remain incomplete. If Ecology performs all or portions of the remedial action because of JELD-WEN's failure to comply with its obligations under this Order, JELD-WEN, Inc. shall reimburse Ecology for the costs of doing such work in accordance with Section VIII. B (Remedial Action Costs) provided that JELD-WEN, Inc. is not obligated under this Section to reimburse Ecology for costs incurred for work inconsistent with or beyond the scope of this Order.

Except where necessary to abate an emergency situation, JELD-WEN, Inc. shall not perform any remedial actions at the Site outside those remedial actions required by this Order, unless Ecology concurs, in writing, with such additional remedial actions.

D. Designated Project Coordinators

The project coordinator for Ecology is:

Isaac Standen
PO Box 47600, Olympia, Washington, 98504
(360) 407-6776
E-Mail: ista461@ecy.wa.gov

The project coordinator for JELD-WEN, Inc. is:

Jay W. Russell
2751 SW Airport Way, Redmond Oregon 97756
(541) 504-2716
E-Mail: jayru@jeld-wen.com

Each project coordinator shall be responsible for overseeing the implementation of this Order. Ecology's project coordinator will be Ecology's designated representative for the Site. To the maximum extent possible, communications between Ecology and JELD-WEN, Inc., and all documents, including reports, approvals, and other correspondence concerning the activities

performed pursuant to the terms and conditions of this Order shall be directed through the project coordinators. The project coordinators may designate, in writing, working level staff contacts for all or portions of the implementation of the work to be performed required by this Decree.

Any party may change its respective project coordinator. Written notification shall be given to the other party at least ten (10) calendar days prior to the change.

E. Performance

All geologic and hydrogeologic work performed pursuant to this Order shall be under the supervision and direction of a geologist licensed in the State of Washington or under the direct supervision of an engineer registered in the State of Washington, except as otherwise provided for by Chapters 18.220 and 18.43 RCW.

All engineering work performed pursuant to this Order shall be under the direct supervision of a professional engineer registered in the State of Washington, except as otherwise provided for by RCW 18.43.130.

All construction work performed pursuant to this Order shall be under the direct supervision of a professional engineer or a qualified technician under the direct supervision of a professional engineer. The professional engineer must be registered in the State of Washington, except as otherwise provided for by RCW 18.43.130.

Any documents submitted containing geologic, hydrologic or engineering work shall be under the seal of an appropriately licensed professional as required by Chapter 18.220 RCW or RCW 18.43.130.

JELD-WEN, Inc. shall notify Ecology in writing of the identity of any engineer(s) and geologist(s), contractor(s) and subcontractor(s), and others to be used in carrying out the terms of this Order, in advance of their involvement at the Site.

F. Access

Ecology or any Ecology authorized representative shall have the full authority to enter and freely move about all property at the Site that JELD-WEN, Inc. either owns, controls, or has access rights to at all reasonable times for the purposes of, *inter alia*: inspecting records, operation logs, and contracts related to the work being performed pursuant to this Order; reviewing JELD-WEN's progress in carrying out the terms of this Order; conducting such tests

or collecting such samples as Ecology may deem necessary; using a camera, sound recording, or other documentary type equipment to record work done pursuant to this Order; and verifying the data submitted to Ecology by JELD-WEN, Inc.. JELD-WEN, Inc. shall make all reasonable efforts to secure access rights for those properties within the Site not owned or controlled by JELD-WEN, Inc. where remedial activities or investigations will be performed pursuant to this Order. Ecology or any Ecology authorized representative shall give reasonable notice before entering any Site property owned or controlled by JELD-WEN, Inc. unless an emergency prevents such notice. All persons who access the Site pursuant to this Section shall comply with any applicable Health and Safety Plan(s). Ecology employees and their representatives shall not be required to sign any liability release or waiver as a condition of Site property access.

G. Sampling, Data Submittal, and Availability

With respect to the implementation of this Order, JELD-WEN, Inc. shall make the results of all sampling, laboratory reports, and/or test results generated by it or on its behalf available to Ecology. Pursuant to WAC 173-340-840(5), all sampling data shall be submitted to Ecology in both printed and electronic formats in accordance with Section VII (Work to be Performed), Ecology's Toxics Cleanup Program Policy 840 (Data Submittal Requirements), and/or any subsequent procedures specified by Ecology for data submittal.

If requested by Ecology, JELD-WEN, Inc. shall allow Ecology and/or its authorized representative to take split or duplicate samples of any samples collected by JELD-WEN, Inc. pursuant to implementation of this Order. JELD-WEN, Inc. shall notify Ecology seven (7) days in advance of any sample collection or work activity at the Site. Ecology shall, upon request, allow JELD-WEN, Inc. and/or its authorized representative to take split or duplicate samples of any samples collected by Ecology pursuant to the implementation of this Order, provided that doing so does not interfere with Ecology's sampling. Without limitation on Ecology's rights under section VIII. F (Access), Ecology shall notify JELD-WEN, Inc. prior to any sample collection activity unless an emergency prevents such notice.

In accordance with WAC 173-340-830(2)(a), all hazardous substance analyses shall be conducted by a laboratory accredited under Chapter 173-50 WAC for the specific analyses to be conducted, unless otherwise approved by Ecology.

H. Public Participation question:

A Public Participation Plan is required for this Site. Ecology shall review any existing Public Participation Plan to determine its continued appropriateness and whether it requires amendment, or if no plan exists, Ecology shall develop a Public Participation Plan alone or in conjunction with JELD-WEN, Inc.. Please see Exhibit F regarding the details about public participation

Ecology shall maintain the responsibility for public participation at the Site. However, JELD-WEN, Inc. shall cooperate with Ecology, and shall:

1. If agreed to by Ecology, develop appropriate mailing list, prepare drafts of public notices and fact sheets at important stages of the remedial action, such as the submission of work plans, remedial investigation/feasibility study reports, cleanup action plans, and engineering design reports. As appropriate, Ecology will edit, finalize, and distribute such fact sheets and prepare and distribute public notices of Ecology's presentations and meetings.

2. Notify Ecology's project coordinator prior to the preparation of all press releases and fact sheets, and before major meetings with the interested public and local governments. Likewise, Ecology shall notify JELD-WEN, Inc. prior to the issuance of all press releases and fact sheets, and before major meetings with the interested public and local governments. For all press releases, fact sheets, meetings, and other outreach efforts by JELD-WEN, Inc. that do not receive prior Ecology approval, JELD-WEN, Inc. shall clearly indicate to its audience that the press release, fact sheet, meeting, or other outreach effort was not sponsored or endorsed by Ecology.

3. When requested by Ecology, participate in public presentations on the progress of the remedial action at the Site. Participation may be through attendance at public meetings to assist in answering questions or as a presenter.

4. When requested by Ecology, arrange and/or continue information repositories to be located at the following locations:

a. Everett Library
2702 Hoyt Ave, Everett, WA

b. Department of Ecology
Toxics Cleanup Program
Headquarters Office
300 Desmond Drive SE, Lacey, Washington

At a minimum, copies of all public notices, fact sheets, and press releases; all quality assured monitoring data; remedial action plans and reports, supplemental remedial planning documents, and all other similar documents relating to performance of the remedial action required by this Order shall be promptly placed in these repositories.

I. Retention of Records

During the pendency of this Order, and for ten (10) years from the date of completion of work performed pursuant to this Order, JELD-WEN, Inc. shall preserve all records, reports, documents, and underlying data in its possession relevant to the implementation of this Order and shall insert a similar record retention requirement into all contracts with project contractors and subcontractors. Upon request of Ecology, JELD-WEN, Inc. shall make all records available to Ecology and allow access for review within a reasonable time.

J. Resolution of Disputes

1. In the event a dispute arises as to an approval, disapproval, proposed change, or other decision or action by Ecology's project coordinator, or an itemized billing statement under Section VIII. B. (Remedial Action Costs), the Parties shall utilize the dispute resolution procedure set forth below.

a. Upon receipt of Ecology’s project coordinator's written decision or the itemized billing statement, JELD-WEN, Inc. has fourteen (14) days within which to notify Ecology's project coordinator in writing of its objection to the decision or itemized statement.

b. The Parties' project coordinators shall then confer in an effort to resolve the dispute. If the project coordinators cannot resolve the dispute within fourteen (14) days, Ecology's project coordinator shall issue a written decision.

c. JELD-WEN, Inc. may then request regional management review of the decision. This request shall be submitted in writing to the Headquarters Toxics Cleanup Section Manager within seven (7) days of receipt of Ecology's project coordinator's written decision.

d. The Section Manager shall conduct a review of the dispute and shall endeavor to issue a written decision regarding the dispute within thirty (30) days of JELD-WEN's request for review. The Section Manager's decision shall be Ecology's final decision on the disputed matter.

2. The Parties agree to only utilize the dispute resolution process in good faith and agree to expedite, to the extent possible, the dispute resolution process whenever it is used.

3. Implementation of these dispute resolution procedures shall not provide a basis for delay of any activities required in this Order, unless Ecology agrees in writing to a schedule extension.

K. Extension of Schedule

1. An extension of schedule shall be granted only when a request for an extension is submitted in a timely fashion, generally at least thirty (30) days prior to expiration of the deadline for which the extension is requested, and good cause exists for granting the extension. All extensions shall be requested in writing. The request shall specify:

a. The deadline that is sought to be extended;

b. The length of the extension sought;

c. The reason(s) for the extension; and

d. Any related deadline or schedule that would be affected if the extension were granted.

2. The burden shall be on JELD-WEN, Inc. to demonstrate to the satisfaction of Ecology that the request for such extension has been submitted in a timely fashion and that good cause exists for granting the extension. Good cause may include, but may not be limited to:

a. Circumstances beyond the reasonable control and despite the due diligence of JELD-WEN, Inc. including delays caused by unrelated third parties or

Ecology, such as (but not limited to) delays by Ecology in reviewing, approving, or modifying documents submitted by JELD-WEN, Inc.;

b. Acts of God, including fire, flood, blizzard, extreme temperatures, storm, or other unavoidable casualty; or

c. Endangerment as described in Section VIII. M (Endangerment).

However, neither increased costs of performance of the terms of this Order nor changed economic circumstances shall be considered circumstances beyond the reasonable control of JELD-WEN, Inc..

3. Ecology shall act upon any written request for extension in a timely fashion. Ecology shall give JELD-WEN, Inc. written notification of any extensions granted pursuant to this Order. A requested extension shall not be effective until approved by Ecology. Unless the extension is a substantial change, it shall not be necessary to amend this Order pursuant to Section VIII. L (Amendment of Order) when a schedule extension is granted.

4. An extension shall only be granted for such period of time as Ecology determines is reasonable under the circumstances. Ecology may grant schedule extensions exceeding ninety (90) days only as a result of:

a. Delays in the issuance of a necessary permit which was applied for in a timely manner;

b. Other circumstances deemed exceptional or extraordinary by Ecology; or

c. Endangerment as described in Section VIII. M (Endangerment).

L. Amendment of Order

The project coordinators may verbally agree to minor changes to the work to be performed without formally amending this Order. Minor changes will be documented in writing by Ecology within seven (7) days of verbal agreement.

Except as provided in Section VIII. N (Reservation of Rights), substantial changes to the work to be performed shall require formal amendment of this Order. This Order may only be formally amended by the written consent of both Ecology and JELD-WEN, Inc.. JELD-WEN, Inc. shall submit a written request for amendment to Ecology for approval. Ecology shall

indicate its approval or disapproval in writing and in a timely manner after the written request for amendment is received. If the amendment to this Order represents a substantial change, Ecology will provide public notice and opportunity to comment. Reasons for the disapproval of a proposed amendment to this Order shall be stated in writing. If Ecology does not agree to a proposed amendment, the disagreement may be addressed through the dispute resolution procedures described in Section VIII. J (Resolution of Disputes).

M. Endangerment

In the event Ecology determines that any activity being performed at the Site is creating or has the potential to create a danger to human health or the environment on or surrounding the Site, Ecology may direct JELD-WEN, Inc. to cease such activities for such period of time as it deems necessary to abate the danger. JELD-WEN, Inc. shall immediately comply with such direction.

In the event JELD-WEN, Inc. determines that any activity being performed at the Site is creating or has the potential to create a danger to human health or the environment, JELD-WEN, Inc. may cease such activities. JELD-WEN, Inc. shall notify Ecology's project coordinator as soon as possible, but no later than twenty-four (24) hours after making such determination or ceasing such activities. Upon Ecology's direction JELD-WEN, Inc. shall provide Ecology with documentation of the basis for the determination or cessation of such activities. If Ecology disagrees with JELD-WEN's cessation of activities, it may direct JELD-WEN, Inc. to resume such activities.

If Ecology concurs with or orders a work stoppage pursuant to Section VIII. M (Endangerment), JELD-WEN's obligations with respect to the ceased activities shall be suspended until Ecology determines the danger is abated, and the time for performance of such activities, as well as the time for any other work dependent upon such activities, shall be extended in accordance with Section VIII. K (Extension of Schedule) for such period of time as Ecology determines is reasonable under the circumstances.

Nothing in this Order shall limit the authority of Ecology, its employees, agents, or contractors to take or require appropriate action in the event of an emergency.

N. Reservation of Rights

This Order is not a settlement under Chapter 70.105D RCW. Ecology's signature on this Order in no way constitutes a covenant not to sue or a compromise of any of Ecology's rights or authority. Ecology will not, however, bring an action against JELD-WEN, Inc. to recover remedial action costs paid to and received by Ecology under this Order. In addition, Ecology will not take additional enforcement actions against JELD-WEN, Inc. regarding remedial actions required by this Order, provided JELD-WEN, Inc. complies with this Order.

Ecology nevertheless reserves its rights under Chapter 70.105D RCW, including the right to require additional or different remedial actions at the Site should it deem such actions necessary to protect human health and the environment, and to issue orders requiring such remedial actions. Ecology also reserves all rights regarding the injury to, destruction of, or loss of natural resources resulting from the release or threatened release of hazardous substances at the Site.

O. Transfer of Interest in Property

No voluntary conveyance or relinquishment of title, easement, leasehold, or other interest in any portion of the Site shall be consummated by JELD-WEN, Inc. without provision for continued implementation of all requirements of this Order and implementation of any remedial actions found to be necessary as a result of this Order.

Prior to JELD-WEN's transfer of any interest in all or any portion of the Site, and during the effective period of this Order, JELD-WEN, Inc. shall provide a copy of this Order to any prospective purchaser, lessee, transferee, assignee, or other successor in said interest; and, at least thirty (30) days prior to any transfer, JELD-WEN, Inc. shall notify Ecology of said transfer. Upon transfer of any interest, JELD-WEN, Inc. shall restrict uses and activities to those consistent with this Order and notify all transferees of the restrictions on the use of the property.

P. Compliance with Applicable Laws

1. All actions carried out by JELD-WEN, Inc. pursuant to this Order shall be done in accordance with all applicable federal, state, and local requirements, including requirements to obtain necessary permits, except as provided in RCW 70.105D.090. At this time, no federal,

state or local requirements have been identified as being applicable to the actions required by this Order.

2. Pursuant to RCW 70.105D.090(1), JELD-WEN, Inc. is exempt from the procedural requirements of Chapters 70.94, 70.95, 70.105, 77.55, 90.48, and 90.58 RCW and of any laws requiring or authorizing local government permits or approvals. However, JELD-WEN, Inc. shall comply with the substantive requirements of such permits or approvals. At this time, no state or local permits or approvals have been identified as being applicable but procedurally exempt under this Section.

JELD-WEN, Inc. has a continuing obligation to determine whether additional permits or approvals addressed in RCW 70.105D.090(1) would otherwise be required for the remedial action under this Order. In the event either Ecology or JELD-WEN, Inc. determines that additional permits or approvals addressed in RCW 70.105D.090(1) would otherwise be required for the remedial action under this Order, it shall promptly notify the other party of its determination. Ecology shall determine whether Ecology or JELD-WEN, Inc. shall be responsible to contact the appropriate state and/or local agencies. If Ecology so requires, JELD-WEN, Inc. shall promptly consult with the appropriate state and/or local agencies and provide Ecology with written documentation from those agencies of the substantive requirements those agencies believe are applicable to the remedial action. Ecology shall make the final determination on the additional substantive requirements that must be met by JELD-WEN, Inc. and on how JELD-WEN, Inc. must meet those requirements. Ecology shall inform JELD-WEN, Inc. in writing of these requirements. Once established by Ecology, the additional requirements shall be enforceable requirements of this Order. JELD-WEN, Inc. shall not begin or continue the remedial action potentially subject to the additional requirements until Ecology makes its final determination.

3. Pursuant to RCW 70.105D.090(2), in the event Ecology determines that the exemption from complying with the procedural requirements of the laws referenced in RCW 70.105D.090(1) would result in the loss of approval from a federal agency that is necessary for the State to administer any federal law, the exemption shall not apply and JELD-

WEN, Inc. shall comply with both the procedural and substantive requirements of the laws referenced in RCW 70.105D.090(1), including any requirements to obtain permits.

Q. Indemnification

JELD-WEN, Inc. agrees to indemnify and save and hold the State of Washington, its employees, and agents harmless from any and all claims or causes of action for death or injuries to persons or for loss or damage to property to the extent arising from or on account of acts or omissions of JELD-WEN, Inc., its officers, employees, agents, or contractors in entering into and implementing this Order. However, JELD-WEN, Inc. shall not indemnify the State of Washington nor save nor hold its employees and agents harmless from any claims or causes of action to the extent arising out of the negligent acts or omissions of the State of Washington, or the employees or agents of the State, in entering into or implementing this Order.

IX. SATISFACTION OF ORDER

The provisions of this Order shall be deemed satisfied upon JELD-WEN's receipt of written notification from Ecology that JELD-WEN, Inc. has completed the remedial activity required by this Order, as amended by any modifications, and that JELD-WEN, Inc. has complied with all other provisions of this Agreed Order.

X. ENFORCEMENT

Pursuant to RCW 70.105D.050, this Order may be enforced as follows:

A. The Attorney General may bring an action to enforce this Order in a state or federal court.

B. The Attorney General may seek, by filing an action, if necessary, to recover amounts spent by Ecology for investigative and remedial actions and orders related to the Site.

C. In the event JELD-WEN, Inc. refuses, without sufficient cause, to comply with any term of this Order, JELD-WEN, Inc. will be liable for:

a. Up to three (3) times the amount of any costs incurred by the State of Washington as a result of its refusal to comply; and

b. Civil penalties of up to twenty-five thousand dollars ($25,000) per day for each day it refuses to comply.

D. This Order is not appealable to the Washington Pollution Control Hearings Board.

This Order may be reviewed only as provided under RCW 70.105D.060.

Effective date of this Order: 1/2/08

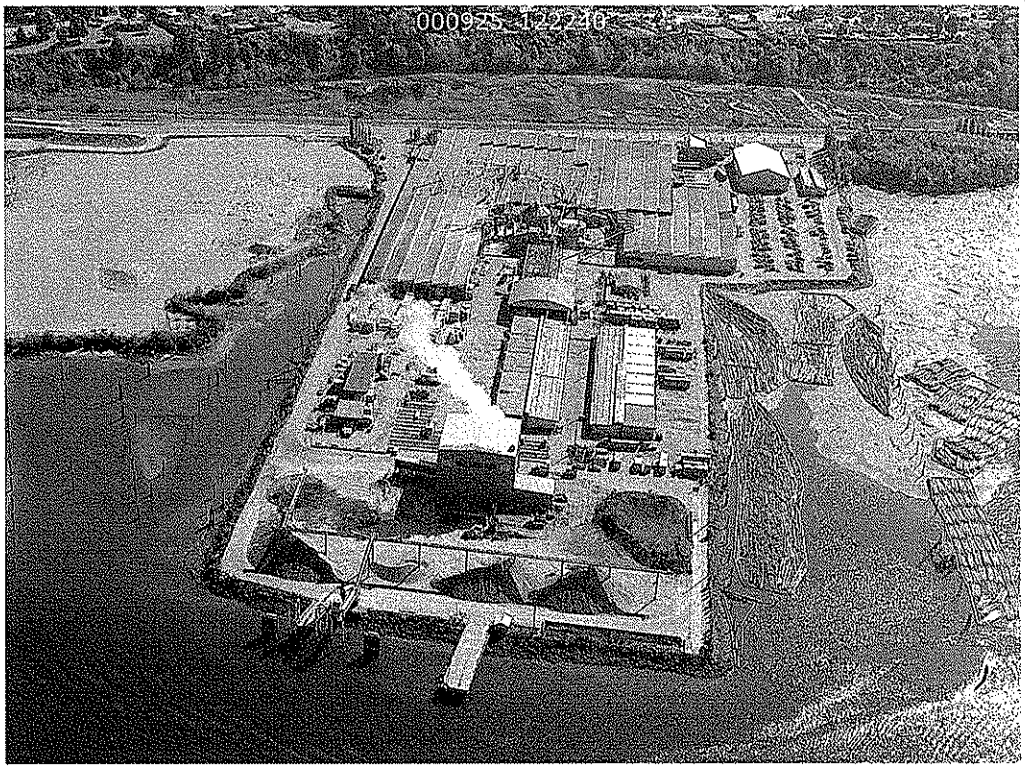
JELD-WEN, Inc.

Jay W. Russell
Special Projects Manager
2751 SW Airport Way, Redmond, OR 97756
(541) 504-2716

STATE OF WASHINGTON,
DEPARTMENT OF ECOLOGY

Tim L. Nord, Manager
Land and Aquatic Lands Section
Toxics Cleanup Program
Headquarters Office
Telephone: (360) 407-7226

EXHIBIT A


000925 122240

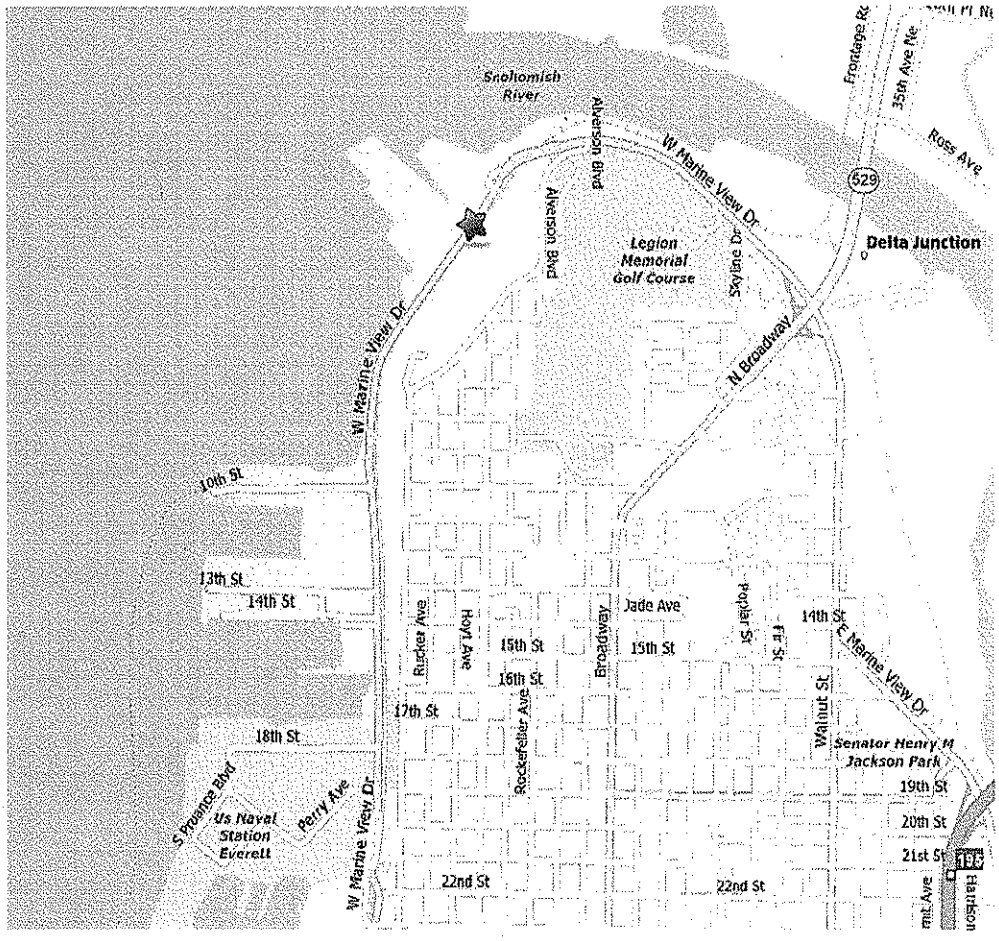

Snohomish River
Alverson Blvd
W Marine View Dr
Frontage Rd
35th Ave Ne
Ross Ave
529
Delta Junction
Legion Memorial Golf Course
Skyline Dr
N Broadway
10th St
13th St
14th St
Rucker Ave
Hoyt Ave
15th St
16th St
17th St
18th St
Broadway
Jade Ave
Poplar St
E Marine View Dr
Walnut St
Senator Henry M Jackson Park
19th St
20th St
21st St
22nd St
Rockefeller Ave
S Proctor Blvd
Perry Ave
Us Naval Station Everett
Harrison

EXHIBIT B

Snohomish County Washington — Online Government Information & Services

* R E A L * Property Information

County Home | Assessor Home | Treasurer Home | Information on which Department to contact

Please view Disclaimer **If you have questions, comments or suggestions, please Contact Us.**

Date/Time:6/6/2007 11:13:18 AM Answers to Frequently Asked Questions about Parcel Data (opens as new window)

Return to Property Information Entry page

Parcel Number **29050700401900** Prev Parcel Reference **07290540190006**

View Map of this parcel (opens as new window)

General Information

Taxpayer Name || Address (contact the Treasurer if you have questions)

JELD-WEN OF EVERETT INC || PO BOX 1329 - - - KLAMATH FALLS, OR 97601

If the above mailing address is incorrect and you want to make a change, see the information on Name and Address Changes

Owner Name || Address (contact the Assessor if you have questions)

JELD-WEN OF EVERETT INC || ATTN PROPERTY TAX DEPT - PO BOX 1329 - - KLAMATH FALLS, OR 97601

If the above name and address is incorrect due to a recent sale, please see the information on Name and Address Changes After a Sale

Street (Situs) Address (contact the Assessor if you have questions)

UNKNOWN UNKNOWN - - -

Parcel Legal Description

SEC 07 TWP 29 RGE 05 BEG AT E1/4 COR OF SEC 7 TH S88*58 38W ALG N LN OF GOVT LOT 2 FOR 675.81FT TO W LN OF THE ABANDONED R/W OF NP/RR CO TH S32*42 38W ALG SD W R/W LN 1175.47FT TH N45*47 22W 40.82FT TO A PT ON W R/W LN OF NORTON AVE TPB TH CONT N45*47 22W 867.27FT TH S44*12 38W 712.80FT TH S72*32 39E 1028.19FT TO A PT ON W R/W LN OF NORTON AVE TH N32*42 38E ALG W R/W LN OF NORTON AVE FOR 255.06FT TPB

Go to top of page

Treasurer's Tax Information

Taxes For answers to questions about Taxes, please contact the Treasurer's office (opens as new window)

2007 Taxes for this parcel $4,501.50

(Taxes may include Surface Water Management and/or State Forest Fire Patrol fees. LID charges, if any, are not included.)

To obtain a duplicate tax statement, either download our Tax Statement Request form or call 425-388-3366 to request it by phone.

Go to top of page

Assessor's Property Data

Characteristics and Value Data below are for 2007 tax year.

Please contact the Treasurer's office **for answers to questions about Taxes** (opens as new window)

For questions ONLY about property characteristics or property values (NOT taxes), please contact the Assessor's Office

Property Values

Values do not reflect adjustments made due to an exemption, such as a senior or disabled persons exemption.
Reductions for exemptions are made on the property tax bill.

Tax Year	Market Land	Market Improvement	Market Total
2007	$423,600	$0	$423,600

Go to top of page

Property Characteristics

Tax Code Area (TCA) **00010** View Taxing Districts for this Parcel (opens as new window)

Use Code **910 Undeveloped (Vacant) Land**

Size Basis **ACRE** Size **10.00** (Size may include undivided interest in common tracts and road parcels)

Go to top of page

Property Structures

No structures found for this parcel

Go to top of page

Property Sales since 7/31/1999

Explanation of Sales Information (opens as new window)

Sales data is based solely upon excise affidavits processed by the Assessor.

No sales for this parcel have been recorded since 7/31/1999

Go to top of page

Property Maps Township/Range/Section/Quarter, links to maps

Neighborhood **5306000** Explanation of Neighborhood Code (opens as new window)

Township **29** Range **05** Section **07** Quarter **SE** Find parcel maps for this Township/Range/Section

View Map of this parcel (opens as new window)

Snohomish County Washington — Online Government Information & Services

* R E A L * Property Information

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Please view Disclaimer **If you have questions, comments or suggestions, please Contact Us.**

Date/Time:6/6/2007 11:05:36 AM Answers to Frequently Asked Questions about Parcel Data (opens as new window)

Return to Property Information Entry page

Parcel Number **29050700400100** Prev Parcel Reference **07290540010006**

View Map of this parcel (opens as new window)

General Information

Taxpayer Name || Address (contact the Treasurer if you have questions)

JELD-WEN OF EVERETT INC || PO BOX 1329 - - - KLAMATH FALLS, OR 97601

If the above mailing address is incorrect and you want to make a change, see the information on Name and Address Changes

Owner Name || Address (contact the Assessor if you have questions)

JELD-WEN OF EVERETT INC || ATTN PROPERTY TAX DEPT - PO BOX 1329 - - KLAMATH FALLS, OR 97601

If the above name and address is incorrect due to a recent sale, please see the information on Name and Address Changes After a Sale

Street (Situs) Address (contact the Assessor if you have questions)

300 W MARINE VIEW DR - - - EVERETT, WA 98201-1030

Parcel Legal Description

SEC 07 TWP 29 RGE 05 BEG 1/4 COR E SIDE SEC 7 TH S88*58 38W ALG S LN GOVT LOT 1 675.81FT TO BDY NP R/W TH S32*42 38W ALG SD R/W 675.47FT TO TPB TH S32*42 38W 500FT TH N45*47 22W 873.84FT TH N30* 28 38E 320.17FT TH N48*26 22W 156. 03FT TH N48*15 22W 282.5FT TH N45* 47 22W 874.7FT TH NELY ALG GOVT PIER HEAD LN N51*00 00E 199.72FT TH S45*47 22 E 2139.36FT TO TPB LESS STRIP 50FT M/L WIDE & 395.8FT LONG SELY SIDE OF TR & LESS 40.8FT STRIP 500FT LONG AS MEAS ON WLY LN NP R/W AS CITY RDWY LESS ANY PTN THOF LY WLY FDL = ALL TH PTN OF GOVT LOTS 1 & 2 & TDLNS LY IN FRONT THOF DAF COM 1/4 COR ON E SIDE OF SD SEC TH S88*58 38W 675.81FT TO WLY R/W LN OF NPRR CO TH S32*42 38W ALG SD N & WLY BDY LN OF SD R/W 175.41FT TH N45*47 22W 40.82FT TO TPB TH CONT ON SAME STRT LN 1428.54FT TH S44*13 56W 688.27FT TH S45*47 22E 281.04FT TH S48*15 22E 282.50FT TH S48*26 22E 156.03FT TH N30*28 38E 184.21FT TH S45*47 22E 853.08FT TAP ON NWLY R/W OF W MARINE VIEW DR TH N32*42 38E 500FT TO TPB ALSO LESS ALL TH PTN OF TDLNS LY IN FRONT OF GOVT LOTS 1 & 2 DAF COM AT 1/4 COR OF E SD OF SEC TH S88*58 38W 675.81FT TO WLY R/W LN OF NPRR CO TH S32*42 38W ALG SD N & WLY BDY LN OF SD R/W 175.41FT TH N45*47 22W 1469.36FT TO TPB TH S44*13 56W 688.27FT TH N45*47 22W 593.66FT TO GOVT PIERHEAD LN TH N51*00 00E 553.93FT TH N64*00 00E 146.90FT TH S45*47 22E 478.70FT TO TPB

Go to top of page

Treasurer's Tax Information

Taxes **For answers to questions about Taxes, please contact the** Treasurer's office (opens as new window)

2007 Taxes for this parcel $36,697.43

(Taxes may include Surface Water Management and/or State Forest Fire Patrol fees. LID charges, if any, are not included.)
To obtain a duplicate tax statement, either download our Tax Statement Request form or call 425-388-3366 to request it by phone.

Go to top of page

Assessor's Property Data

Characteristics and Value Data below are for 2007 tax year.

Please contact the Treasurer's office for answers to questions about Taxes (opens as new window)

For questions ONLY about property characteristics or property values (NOT taxes), please contact the Assessor's Office

Property Values

Values do not reflect adjustments made due to an exemption, such as a senior or disabled persons exemption.
Reductions for exemptions are made on the property tax bill.

Tax Year	Market Land	Market Improvement	Market Total
2007	$2,925,600	$527,700	$3,453,300

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Property Characteristics

Tax Code Area (TCA) **00010** View Taxing Districts for this Parcel (opens as new window)

Use Code **242 Sawmills & Planing Mills**

Size Basis **ACRE** Size **12.72** (Size may include undivided interest in common tracts and road parcels)

Go to top of page

Property Structures

Type	Yr.Built	Structure Description	
Commercial	**1918**	**Bld 1A NORD JELD WEN**	View Structure Data (opens as new window)
Commercial	**1973**	**Bld 5A Office Bld**	View Structure Data (opens as new window)

Go to top of page

Property Sales since 7/31/1999

Explanation of Sales Information (opens as new window)

Sales data is based solely upon excise affidavits processed by the Assessor.

No sales for this parcel have been recorded since 7/31/1999

Go to top of page

Property Maps

Township/Range/Section/Quarter, links to maps

Neighborhood **5306000** Explanation of Neighborhood Code (opens as new window)

Township **29** Range **05** Section **07** Quarter **SE** Find parcel maps for this Township/Range/Section

View Map of this parcel (opens as new window)

Snohomish County Washington — Online Government Information & Services

* R E A L * Property Information

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Please view Disclaimer **If you have questions, comments or suggestions, please Contact Us.**

Date/Time:6/6/2007 10:52:17 AM Answers to Frequently Asked Questions about Parcel Data (opens as new window)

Return to Property Information Entry page

Parcel Number **29050700101200** Prev Parcel Reference **07290510120009**

View Map of this parcel (opens as new window)

General Information

Taxpayer Name || Address (contact the Treasurer if you have questions)

JELD-WEN OF EVERETT INC || 401 HARBOR ISLES BLVD - - - KLAMATH FALLS, OR 97601

If the above mailing address is incorrect and you want to make a change, see the information on Name and Address Changes

Owner Name || Address (contact the Assessor if you have questions)

JELD-WEN OF EVERETT INC || 401 HARBOR ISLES BLVD - - - KLAMATH FALLS, OR 97601

If the above name and address is incorrect due to a recent sale, please see the information on Name and Address Changes After a Sale

Street (Situs) Address (contact the Assessor if you have questions)

222 W MARINE VIEW DR - - - EVERETT, WA 98201-1029

Parcel Legal Description

SEC 07 TWP 29 RGE 05 ALL TH PTN OF TDLNS LY IN FRONT OF GOVT LOTS 1 & 2 DAF - COM AT 1/4 COR ON E SD OF SEC TH S88*58 38W 675.81FT TO WLY R/W LN OF NPRR CO TH S32*42 38W ALG SD N & WLY BDY LN OF SD R/W 175.41FT TH N45*47 22W 1469.36FT TO TPB TH S44*13 56W 688.27FT TH N45*47 22W593.66FT TO GOVT PIERHEAD LN TH N51*00 00E 553.93FT TH N64*00 00E 146.90FT TH S45*47 22E 478.70FT TO TPB

Go to top of page

Treasurer's Tax Information

Taxes For answers to questions about Taxes, please contact the Treasurer's office (opens as new window)

2007 Taxes for this parcel $25,147.19

(Taxes may include Surface Water Management and/or State Forest Fire Patrol fees. LID charges, if any, are not included.)

To obtain a duplicate tax statement, either download our Tax Statement Request form or call 425-388-3366 to request it by phone.

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Assessor's Property Data

Characteristics and Value Data below are for 2007 tax year.

Please contact the Treasurer's office **for answers to questions about Taxes** (opens as new window)

For questions ONLY about property characteristics or property values (NOT taxes), please contact the Assessor's Office

Property Values

Values do not reflect adjustments made due to an exemption, such as a senior or disabled persons exemption.
Reductions for exemptions are made on the property tax bill.

Tax Year	Market Land	Market Improvement	Market Total
2007	$1,296,400	$1,070,000	$2,366,400

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Property Characteristics

Tax Code Area (TCA) **00010** View Taxing Districts for this Parcel (opens as new window)

Use Code **292 Paving & Roofing Materials**

Size Basis **ACRE** Size **6.09** (Size may include undivided interest in common tracts and road parcels)

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Property Structures

Type	Yr.Built	Structure Description
Commercial	**1995**	**RINKER MATERIALS NORTH PLANT** View Structure Data (opens as new window)

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Property Sales since 7/31/1999

Explanation of Sales Information (opens as new window)

Sales data is based solely upon excise affidavits processed by the Assessor.

No sales for this parcel have been recorded since 7/31/1999

Go to top of page

Property Maps Township/Range/Section/Quarter, links to maps

Neighborhood **5306000** Explanation of Neighborhood Code (opens as new window)

Township **29** Range **05** Section **07** Quarter **NE** Find parcel maps for this Township/Range/Section

View Map of this parcel (opens as new window)

Snohomish County Washington — Online Government Information & Services

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Date/Time:6/6/2007 10:07:34 AM Answers to Frequently Asked Questions about Parcel Data (opens as new window)

Return to Property Information Entry page

Parcel Number **29050700100400** Prev Parcel Reference **07290510040009**

View Map of this parcel (opens as new window)

General Information

Taxpayer Name || Address (contact the Treasurer if you have questions)

JELD-WEN OF EVERETT INC || PO BOX 1329 - - - KLAMATH FALLS, OR 97601

If the above mailing address is incorrect and you want to make a change, see the information on Name and Address Changes

Owner Name || Address (contact the Assessor if you have questions)

JELD-WEN OF EVERETT INC || 401 HARBOR ISLES BLVD - - - KLAMATH FALLS, OR 97601

If the above name and address is incorrect due to a recent sale, please see the information on Name and Address Changes After a Sale

Street (Situs) Address (contact the Assessor if you have questions)

300 W MARINE VIEW DR - - - EVERETT, WA 98201-1030

Parcel Legal Description

SEC 07 TWP 29 RGE 05 ALL TH PTN OF GOVT LOTS 1 & 2 & TDLNS LY IN FRONT THOF DAF COM 1/4 COR ON E SIDE OF SD SEC TH S88*58 38W 675.81FT TO WLY R/W LN OF NPRR CO TH S32*42 38W ALG SD N & WLY BDY LN OF SD R/W 75.41FT TH N45*47 22W 40.82FT TO TPB TH CONT ON SAME STRT LN 1428.54FT TH S44*13 56W 688.27FT TH S45*47 22E 281.04FT TH S48*15 22E 282.50FT TH S48*26 22E 156.03FT TH N30*28 38E 184.21FT TH S45*47 22E 853.08FT TAP ON NWLY R/W OF W MARINE VIEW DR TH N32*42 38E 500FT TO TPB TGW BEG AT E1/4 COR TH S88*58 38W 675.81FT TH S32*42 38W 75.41FT TH N45*47 22W 40.82FT TO W MGN MARINE VIEW DR TPB TH SLY ALG W MGN SD RD 100FT TH N45*47 22W TO SLY MGN RR SPUR TH SELY & ELY ALG RR SPUR TAP N45*47 22W OF TPB TH S45*47 22E TO TPB

Go to top of page

Treasurer's Tax Information

Taxes For answers to questions about Taxes, please contact the Treasurer's office (opens as new window)

2007 Taxes for this parcel $53,662.01

(Taxes may include Surface Water Management and/or State Forest Fire Patrol fees. LID charges, if any, are not included.)

To obtain a duplicate tax statement, either download our Tax Statement Request form or call 425-388-3366 to request it by phone.

Go to top of page

Assessor's Property Data

Characteristics and Value Data below are for 2007 tax year.

Please contact the Treasurer's office **for answers to questions about Taxes** (opens as new window)

For questions ONLY about property characteristics or property values (NOT taxes), please contact the Assessor's Office

Property Values

Values do not reflect adjustments made due to an exemption, such as a senior or disabled persons exemption.
Reductions for exemptions are made on the property tax bill.

Tax Year	Market Land	Market Improvement	Market Total
2007	$4,328,600	$721,100	$5,049,700

Go to top of page

Property Characteristics

Tax Code Area (TCA) **00010** View Taxing Districts for this Parcel (opens as new window)

Use Code **242 Sawmills & Planing Mills**

Size Basis **ACRE** Size **18.82** (Size may include undivided interest in common tracts and road parcels)

Go to top of page

Property Structures

Type	Yr.Built	Structure Description
Commercial	**1947**	**NORD JELD WEN OF EVT INC** View Structure Data (opens as new window)
Commercial	**1964**	**Bld 5 Dry Kilns** View Structure Data (opens as new window)
Commercial	**1966**	**Bld 7 Boiler and Boile Hse** View Structure Data (opens as new window)
Commercial	**1970**	**10 Pump House and Tank** View Structure Data (opens as new window)
Commercial	**1971**	**13 Dry Kilns and Sheds** View Structure Data (opens as new window)
Commercial	**1999**	**14 Modular Office** View Structure Data (opens as new window)

Go to top of page

Property Sales since 7/31/1999

Explanation of Sales Information (opens as new window)

Sales data is based solely upon excise affidavits processed by the Assessor.

No sales for this parcel have been recorded since 7/31/1999

Go to top of page

Property Maps Township/Range/Section/Quarter, links to maps

Neighborhood **5306000** Explanation of Neighborhood Code (opens as new window)

Township **29** Range **05** Section **07** Quarter **NE** Find parcel maps for this Township/Range/Section

View Map of this parcel (opens as new window)

EXHIBIT C

DEPARTMENT OF ECOLOGY
ENVIRONMENTAL REPORT TRACKING SYSTEM
INITIAL REPORT/FOLLOWUP

COORDINATOR: ELIN ABRAMSON DATE/TIME REC'D: 12/08/1989 15:00:00

REPORT #: 15 REPORT TYPE: INITIAL REGION CODE: N

DETAILS RECEIVED ON REPORTER: OR ANONYMOUS:

GIL HASELBERGER 442-1094
EPA REGION 10
SEATTLE WA 98191-0000 BEST TIME TO RETURN CALL:
EILEEN HAYES - CONTACT (442-2584)

DETAILS RECEIVED ON INCIDENT: WATER WAY INFORMATION:

COUNTY CODE: SNOHOMISH

DESCRIPTION OF INCIDENT LOCATION: EVERETT
FACILITY ON SITE USED FOR STORAGE OF PCBS IN VIOLATION OF 40CFR761.65(B)

DETAILS ON ALLEDGED VIOLATOR:

CONTACT'S NAME:

ALLEDGED VIOLATOR'S NAME & ADDRESS:

RON MINER, GENERAL MANAGER NORD COMPANY, TELEPHONE NUMBER:
P.O. BOX 1187
EVERETT, WA 98206-0000

ADDITIONAL INFORMATION REGARDING ALLEDGED VIOLATOR:
300 WEST MARINE VIEW DRIVE, EVERETT

DESCRIPTION OF CONTAMINANT

MEDIA: 00 OTHER IMPROPER STORE
MATERIAL: OIL/PETROLEUM PCB STORAGE

SOURCES: 00 UNSPECIFIED SOURCE
00 UNSPECIFIED SOURCE

COMMENTS: PCB CAPACITORS UNLABLED, INADEQUATE ROOFING TO PREVENT RAIN FROM REACHING PCBS AND INADEQUATE FLORING, NO DRAIN VALVES, NOT LOCATED AT SITE THAT IS BELOW 100YR. FLOOD PLAIN. INSPECTION ON 6/27/89

CONTINUED ON NEXT PAGE

DEPARTMENT OF ECOLOGY
ENVIRONMENTAL REPORT TRACKING SYSTEM
INITIAL REPORT/FOLLOWUP

PROGRAM & SECTION HEAD:

REFERRED TO FOR REVIEW: HWIC LEE DORIGANNBN

INTERNAL REFERRAL

DATE ASSIGNED: _____

DATE DUE: _____

NAME OF STAFF PERSON: Rachel Friedman-Thomas / Norm Peck

IMPACT CODE: _____ (H=HUMAN, E=ENVIRONMENT OR B=BOTH)

ADDITIONAL INFORMATION: large industrial facility, unannounced full inspection
~~####~~, suspect organics, phenols, PCB's, based on general practices
historic to wood fabrication industries + EPA/TOSCA inspection report.

CROSS-REFERENCES TO OTHER SYSTEMS: _____

COMPLETED DATE: 29 Mar 90

4/6/10 - contacted Eileen Hayes - EPA has virtually closed the book on this PCB issue. The capacitors have been removed from the site + EPA is awaiting the disposal certificates. This letter was generated from a routine site inspection + was only a "bookkeeping" violation. RFT

I. EPA/STATE Hazardous Waste I.D.#

WAD 988 176 565 1

II. Waste Designated By:
___ RCRA/State ___ SQ
___ State Only
___ Non-Regulated/Non-Handler/Protective Filing

III. Exemption Status:
___ RCRA Exempt Recycler
___ State Exempt Recycler
___ Below QEL
___ Other

IV. Handling
___ Emergency
___ Remedial Action
___ One-Time-Only
___ Other

DEPARTMENT USE ONLY

NOTIFICATION OF DANGEROUS WASTE ACTIVITIES

(send to) Attn: DW Notifications
Washington State Department of Ecology
M/S PV-11 Olympia, WA. 98504-8711
(206) 459- /6305/6306

Init.: ___ Date: ___ Region: ___
EPA: ___ Date: ___ Copy: ___
Input: ___ Update: ___ Ack.: ___
DEPARTMENT USE ONLY

1. [X] A. FIRST NOTIFICATION
[ ] B. REVISED NOTIFICATION (enter current I.D.# in upper left)
revisions effective: ___ MO. / ___ DAY / ___ YR
[ ] C. WE REQUEST TO HAVE OUR I.D.# WITHDRAWN (enter current I.D.# assigned to you in section 99 in upper left)
[ ] D. REACTIVATE OUR NOTIFICATION (complete all sections)
[ ] E. SITE CLOSED (We are no longer conducting business at this location and want our I.D. No. cancelled)

2.A. WASHINGTON STATE DEPARTMENT OF REVENUE REGISTRATION (TAX) NUMBER
600-627-882

2.B. SIC CODE(S) PRIMARY SECONDARY OTHER

8. NAME OF COMPANY
WORD

RECEIVED
JAN 06 REC'D
TECHNICAL OPERATIONS SECTION

4. MAILING ADDRESS
STREET, P.O. BOX, OR RURAL ROUTE & BOX NO.
PO BOX 11187
CITY OR TOWN: EVERETT
STATE: WA ZIP CODE: 98206-

5. LOCATION OF WASTE ACTIVITIES (Installation)
DESCRIPTION OF PHYSICAL LOCATION (Follow Instructions Carefully)
300 W MARINE VIEW
CITY OR TOWN: EVERETT
STATE: WA ZIP CODE: 98206-

6. COUNTY WHERE THIS INSTALLATION IS LOCATED
SNOHOMISH 061

7. DANGEROUS WASTE ACTIVITIES YOUR BUSINESS IS CONDUCTING
(Read & Follow Instructions Carefully—Enter an "X" in appropriate box(es))

A. [X] GENERATOR

B. [ ] TRANSPORTER (complete this section only if YOU are transporting waste for hire or your own waste to an off-site facility)
(1) [ ] We Transport Waste For Hire
(2) Modes of Transport YOU Operate
(a) [ ] HIGHWAY (b) [ ] AIR (c) [ ] RAIL
(d) [ ] WATER (e) [ ] OTHER ___

C. [ ] WASTE MANAGEMENT FACILITY (TSD) (refer to definitions in instructions
(1) [ ] TREATMENT
(2) [ ] STORAGE
(3) [ ] DISPOSAL
(4) [ ] WE ACCEPT OFF-SITE WASTES

D. [ ] UNDERGROUND INJECTION

8. CONTACT PERSON
NAME (last), (first)
JOHNSON ROBERT
TITLE: FACILITIES MANAGER
PHONE NO. (area code & number): 206-259-9292

9A. OWNERSHIP (Legal Owner(s) of this Company)
PRIVATELY HELD CORP

9B. OWNERSHIP (Legal Owner(s) of site (Property))
SAME

10. TYPE OF OWNERSHIP (enter letter code in box)
P

1-12-87 1-21-87

	Description of Waste(s)	C. Dangerous Waste Number (refer to WAC 173-303)	D. Estimated or Actual Annual Waste Quantity	E. WEIGHT CODE
1		WT02D001	20000	P
2				
3				
4				
5				
6				
7				
8				
9				
10				

12. ESTIMATED MAXIMUM QUANTITY of all wastes, listed above, to be produced in any given month or per processing batch.

A. ☐ Batch Frequency 30 Days QUANTITY 10000 WEIGHT P CODE

B. ☒ PER MONTH QUANTITY 10000 WEIGHT CODE

13. COMMENTS (Enter Information by Section & Line Number—See Instructions)

14. FORMS AND INFORMATION REQUEST
(Check the box(es) of those items desired and indicate how many)

A. ☐ NOTIFICATION FORM
B. ☐ PART A PERMIT FORM FOR TSD FACILITIES
C. ☐ BIOLOGICAL TEST PROCED.
D. ☐ GENERATOR ANNUAL REPORT FORM
E. ☐ CHEMICAL TEST PROCED.
F. ☐ TSD FACILITY ANNUAL REPORT/UNMANIFESTED WASTE REI
G. ☐ DANGEROUS WASTE LEGISLATION (RCW 70.105) AND REGULATIONS (WAC 173-303)
H. ☐ DANGEROUS WASTE FEES LEGISLATION (RCW 70.105A) & REGULATION (WAC 173-305)
I. ☐ OTHER (specify)

15. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I a aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE: Ronald J. Miner
PRINTED NAME: RONALD J. MINER
OFFICIAL TITLE (Print): GENERAL MGR.
DATE SIGNED: 1/5/8

Type or print. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD 981765654 | Manifest Document No. 01-13-01 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
FORD INC
BOX 1197 EVERETT WA 98206

4. Generator's Phone (206) 259-7292

5. Transporter 1 Company Name | 6. US EPA ID Number

7. Transporter 2 Company Name
OAK HARBOR FREIGHT | 8. US EPA ID Number WAD002799347

9. Designated Facility Name and Site Address
LIQUID PET
2244 PORT OF TACOMA RD
TACOMA WA 98401 | 10. US EPA ID Number WAD027543032

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a.	WASTE PAINT RELATED MATERIALS FLAMMABLE LIQ NA 1263 RQ 100 #	X	2	DM	110	G
b.	WASTE ACETONE UN 1090 FLAMMABLE MATERIAL RQ 5000 #	X	1	DM	40	G
c.	WASTE PAINT SLUDGE MATERIALS FLAMMABLE SLUDGE NA 1263 RQ 100 #	X	1	DM	5	G
d.						

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
IN CASE OF ACCIDENTAL SPILL OR RELEASE OF RQ AMOUNTS IMMEDIATELY CONTACT NATIONAL RESPONSE CENTER AT 1-800-247-8802

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month	Day	Year
X Robert D Jackson		1	13	87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
X R Potts		1	13	87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name	Signature	Month	Day	Year
DAVID J Tosh		01	13	87

Style F15REV-6 Labelmaster, Div of American Labelmark Co. Inc. 60646

EPA Form 8700-22 (Rev. 9/86) Previous editions are obsolete.

TCDF COPY

Print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2000-0404, Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. WAD 981765654 | Manifest Document No. 01-08-2 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
NORD INC.
BOX 1187 EVERETT WA. 98206

4. Generator's Phone (206) 259-9292

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: OAK HARBOR FREIGHT | 6. US EPA ID Number: WAD 002788347 | C. State Transporter's ID | D. Transporter's Phone 244-3230

7. Transporter 2 Company Name | 8. US EPA ID Number | E. State Transporter's ID | F. Transporter's Phone

9. Designated Facility Name and Site Address
SOL-PRO/LILYBLAD PETROLEUM
2244 PORT OF TACOMA RD.
TACOMA WA 98401

10. US EPA ID Number: WAD 027543032

G. State Facility's ID

H. Facility's Phone 206-627-2248

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE FLAMMABLE LIQUID NOS FLAMMABLE LIQUID UN 1993	X	5	DM	250	G	D001 WT02
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
(a) SPENT SOLVENT

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

GENERATOR

Printed/Typed Name: Robert D. Johnson | Signature | Month 1 Day 8 Year 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Ric Johnston | Signature | Month 1 Day 8 Year 87

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month Day Year

FACILITY

19. Discrepancy Indication Space
1. EXPIRED MANIFEST DATE
2. MISSING RQ VALUE

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: JAMES C. ECKLUND | Signature | Month 01 Day 08 Year 87

Style F15R-6 Labelmaster, Div. of American Labelmark Co. Inc. 60646 EPA Form 8700-22 (Rev. 4-85) Previous edition is obsolete.

RETURN ORIGINAL MANIFEST TO GENERATOR 1/9/87 RR

United States
Environmental Protection
Agency

Region 10
1200 Sixth Avenue
Seattle WA 98101

Alaska
Idaho
Oregon
Washington

DCE

EPA

Reply To
Attn of: AT-083

CERTIFIED MAIN - RETURN RECEIPT REQUESTED

NOTICE OF NONCOMPLIANCE

Frank DeVol
~~Ron Miner~~, General Manager
NORD Company, Inc.
P.O. Box 1187
Everett, Washington 98206

259-9292

Dear Mr. Miner:

This concerns the June 27, 1989 inspection of NORD Company located at 300 West Marine View Drive, Everett, Washington, which was performed by Michael R. Hoyles of the United States Environmental Protection Agency (EPA) pursuant to Section 11 of the Toxic Substances Control Act (TSCA). This inspection was conducted to determine whether activities at the facility were in compliance with EPA Regulations governing polychlorinated biphenyls (PCBs): 40 C.F.R. Part 761.

During the inspection, violations of the regulations were noted. You should be aware that violations of TSCA may result in the issuance of an administrative civil complaint and the assessment of penalties. The following identifies in detail the violations observed during the inspection.

VIOLATION ONE

REGULATION - STORAGE: 40 C.F.R. § 761.65(b) requires that any facility used for the storage of PCBs and PCB Items designated for disposal meet the following criteria:

1) Adequate roof and walls to prevent rain water from reaching the stored PCBs and PCB Items;
2) An adequate floor which has continuous curbing with a minimum six inch high curb. The floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB Article or PCB Container stored therein or 25 percent of the total internal volume of all PCB Containers stored therein, whichever is greater;
3) No drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area;
4) Floors and curbing constructed of continuous smooth and impervious materials, such as Portland cement concrete or steel, to prevent or minimize penetration of PCBs; and
5) Not located at a site that is below the 100-year flood water elevation.

Noted by Inspector

VIOLATION ONE: The pole where the three out of service pole-mounted PCB Capacitors were stored did not meet the requirements of a PCB Storage for disposal area.

VIOLATIONS TWO THROUGH EIGHT

REGULATION - MARKING: 40 C.F.R. § 761.40 requires that all PCB Containers, PCB Transformers, Large PCB Capacitors, and PCB storage for disposal areas be marked in accordance with 40 C.F.R. § 761.45. In general, a 6 inch by 6 inch PCB label is required, although the label may be reduced in size proportionately to a minimum of 2 inches by 2 inches for equipment too small to accommodate the standard 6 inch by 6 inch label.

VIOLATIONS TWO THROUGH SEVEN: The following six PCB Capacitors were not marked with the required PCB label.

VIOLATIONS TWO THROUGH FOUR: Three pole-mounted PCB Capacitors, no model or serial number identified, located in the parking lot south of the facility and west of the warehouse.

VIOLATIONS FIVE THROUGH SEVEN: Three out of service pole-mounted PCB capacitors, no model or serial number identified, located on the third pole west of the warehouse.

VIOLATION EIGHT: The area where three out of service pole-mounted PCB Capacitors were located, which are the subject of Violations Five through Seven, was not marked with the PCB label required for a storage area.

EPA has reviewed the information submitted by your company documenting that the PCB Capacitors were removed and disposed of. We appreciate your prompt attention in this matter. Within thirty days of your receipt of this letter, you should also provide EPA with copies of disposal certificates for the PCB Capacitors.

If you have any questions regarding this letter, please contact Eileen Hayes of my staff. She can be reached at EPA Region 10, Pesticides and Toxic Substances Branch, Mail Stop AT-083, 1200 Sixth Avenue, AT-083, Seattle, Washington; telephone (206) 442-2584.

Sincerely,

Gil Haselberger, Chief
Toxic Substances Section

cc: John Foley, EPA HQ
State Ag Dept.

EXHIBIT D

JELD-WEN

MANUFACTURERS OF: WOOD WINDOWS AND DOORS • MILLWORK • OTHER BUILDING PRODUCTS

3303 LAKEPORT BLVD. • P.O. BOX 1329 KLAMATH FALLS, OREGON 97601-0268 USA
TELEPHONE 503-882-3451 ADMIN. FAX 503-885-7454 OPER. FAX 503-885-7423

February 11, 1994

TO: State of Washington
Department of Ecology
Northwest Regional Office
Attn: Michael Gallagher
3190 160th Ave. S.E.
Bellvue, WA 98008-5452

RE: Nord Door/JELD-WEN of Everett
300 W. Marine View Drive
Everett, WA 98026

Dear Mr. Gallagher:

With this letter, I would like to formally report the discovery of waste in the environment in excess of Model Toxics Control Act recommended clean-up levels. On November 19, 1993, I received a fax from Huckel/Weinman Associates, Inc. (HWA) outlining the discovery on our industrial site.

JELD-WEN is in the process of leasing a portion of the Everett, WA. facility. Through the independent site review that Huckel/Weinman Associates, Inc. performed, for the prospective lessee, the discovery was made. RZA AGRA, Inc. performed the site assessment under contract to HWA. The package of information was made available to JELD-WEN through the Environmental Impact Statement HWA produced for Sterling Asphalt, the prospective lessee.

The contamination discovered was Total Petroleum Hydrocarbons. One soil sample showed a result of 700 ppm, which exceeds the Model Toxics Control Act recommended level of 200 ppm. This Table 2 Method A Cleanup level is based on protection of ground water.

Two ground water samples produced levels of 16 ppm and 1.6 ppm, which exceeds MTCA levels of 1.0 ppm. The cleanup level indicated is a conservative level, but exceedance in the values indicated in Table 1 of the Method A levels do not necessarily trigger requirements for cleanup action. The indicated cleanup level is based on prevention of adverse aesthetic characteristics. The location of the samples are identified on the enclosed map.

Historical review of the site indicates that this has been a wood products manufacturing plant since early in the century. The site has grown through periodic fill in the Port Gardner tide lands. The latest reclaim occurred in 1978 after an extensive Environmental Impact Statement was received and approved.

By using dated aerial photographs, available from the 1940's to present, there does not appear to be any process which would produce or cause a petroleum contamination. The approximate area of contamination is by the reclaimed portion of the Port Gardner tide lands where, years ago, loading of materials and moorage of boats occurred.

On August 21, 1991 you, as a representative of the Department of Ecology, offered a relative health and environmental risk for this site of a 5: representing the lowest risk. This ranking was based on historical review and site reconnaissance. Parametrix completed their study for the D.O.E. in June of 1991.

There has been no independent action at this time. A review of historical site procedures, previous reports, interviews with employees, and aerial photographs have been done to determine the need for further investigation.

Based on the information available, it does not appear that this discovery is of major impact. The levels of TPH, though in excess of Model Toxics Control Act closure levels which are advisory, based on the occupancy and exposure, should be protective of human health and the environment and closure at such levels should be appropriate.

After review of the attached data and information or if you have need of further information, please contact me. Thank you.

Sincerely yours,

JELD-WEN, inc.

Charles R. Taylor WSO-CSM, CHMS
Safety & Environmental Manager

attachments

wpdoc\johng\ndcontam

cc: Matt Beddoe
Randy Cox

ATTACHMENT A

D.O.E. RANKING AND SUMMARY SCORE SHEET FOR NORD FACILITY

CHRISTINE O. GREGOIRE
Director

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

August 21, 1991

Mr. Mike Negrete
Nord Door
300 W. Marine View Drive
Everett, WA 98026

Dear Mr. Negrete:

The Department of Ecology has now assessed the relative health and environmental rick of Nord Door site. A ranking of 5 (with 1 being highest risk and 5 being lowest risk) has been calculated.

For your information, Ecology will be publishing the ranking of this and other sites in the August 27 Site Register. The rankings will be used in conjunction with other considerations in determining Ecology's priority for future actions at sites. It is not anticipated this ranking will affect the current activities at the site.

The site ranking effort is being conducted under the Model Toxics Control Act. A fact sheet on the ranking method is enclosed for your information.

For further information, please contact Judith Aitken at 649-7135.

Sincerely,

Michael Gallagher

Michael Gallagher
Supervisor
Toxics Cleanup Program

MG:cs
Enclosure

8/26/91

RECEIVED
AUG 26 1991
NORD/JELD-WEN

cc: Randy Cox
Stan Meyers
Bill Schauermann

11/23/93

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 4
To JOHN	From MIKE
Co. JELD-WEN	Co. NORD
Dept. SAFETY	Phone #
Fax # (503) 885-7424	Fax # (206) 252-7422

WORKSHEET 1
SUMMARY SCORE SHEET

Site Name/Location (City, County, Section/Township/Range):

NORD DOOR
Everett, Snohomish County

The site is in NE1/4, NE1/4, SE1/4 of Section 7, T29N, R5E.

Site Description (Include management areas, compounds of concern, and quantities):

Nord Door is situated adjacent to the Snohomish on an area of fill. Current processes involve sorting, stacking, drying, planing and cutting lumber and assembling and finishing doors, rails, posts, columns and spindles. They occasionally fabricate their own machinery. No contaminants were found to exceed MTCA levels.

Management Areas Surface and ground soils, and surface water.

Compounds of Concern Acetone, chloroform, and Methylene Chloride.

Quantities Unknown

Special Considerations (Include limitations in site file data or data which cannot be accommodated in the model, but which are important in evaluating the risk associated with the site, or any other factor(s) over-riding a decision of no further action for the site):

None

ROUTE SCORES:

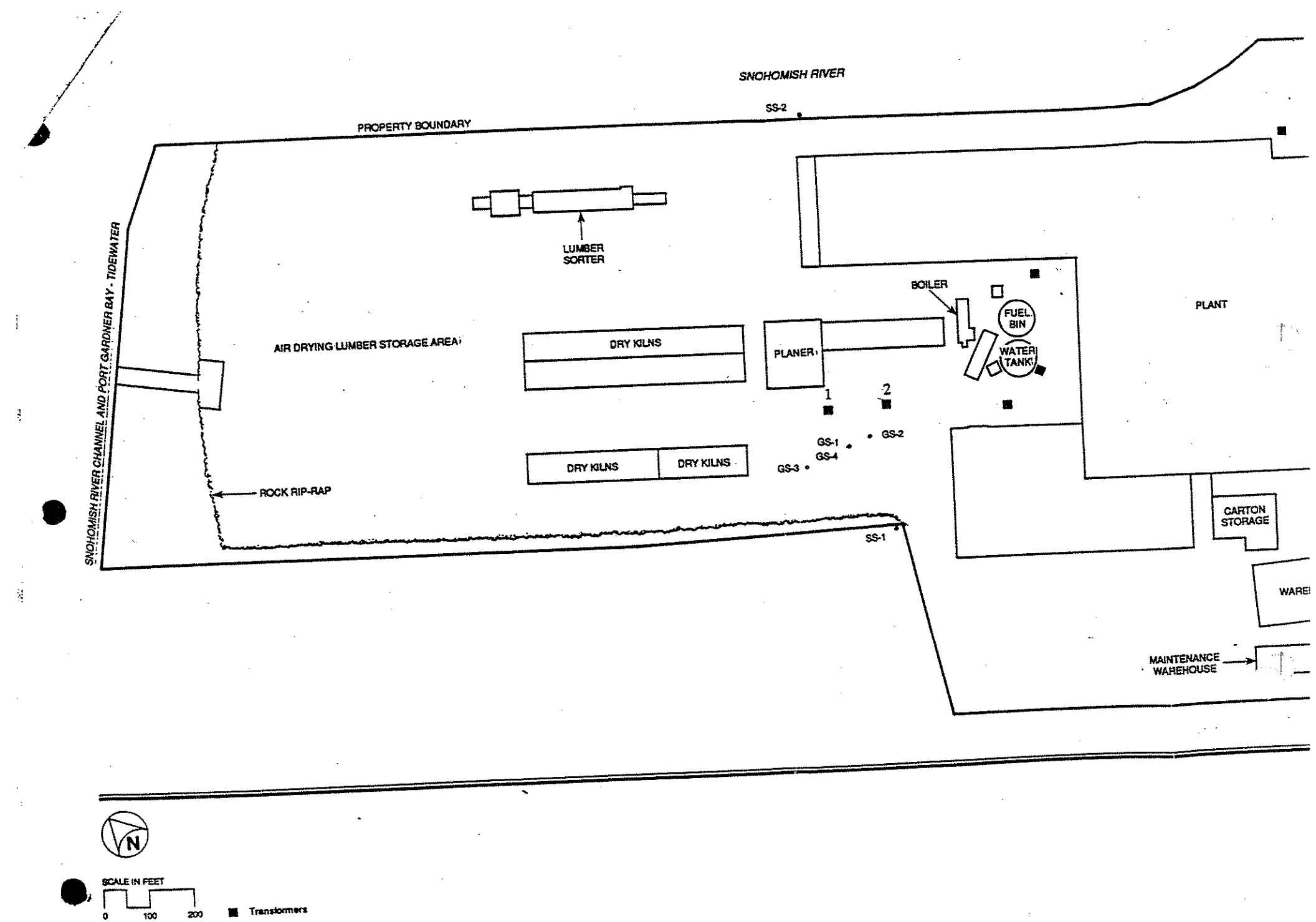
Surface Water/Human Health:	1.8	Surface Water/Environ.:	6.5
Air/Human Health:	7.1	Air/Environmental:	18.9
Ground Water/Human Health:	16.2		

OVERALL RANK: 5

Rev. 5/31/91

ATTACHMENT B

SITE LOCATION OF PARAMETRIX SAMPLE LOCATIONS FOR D.O.E. RISK ASSESSMENT JUNE 1991

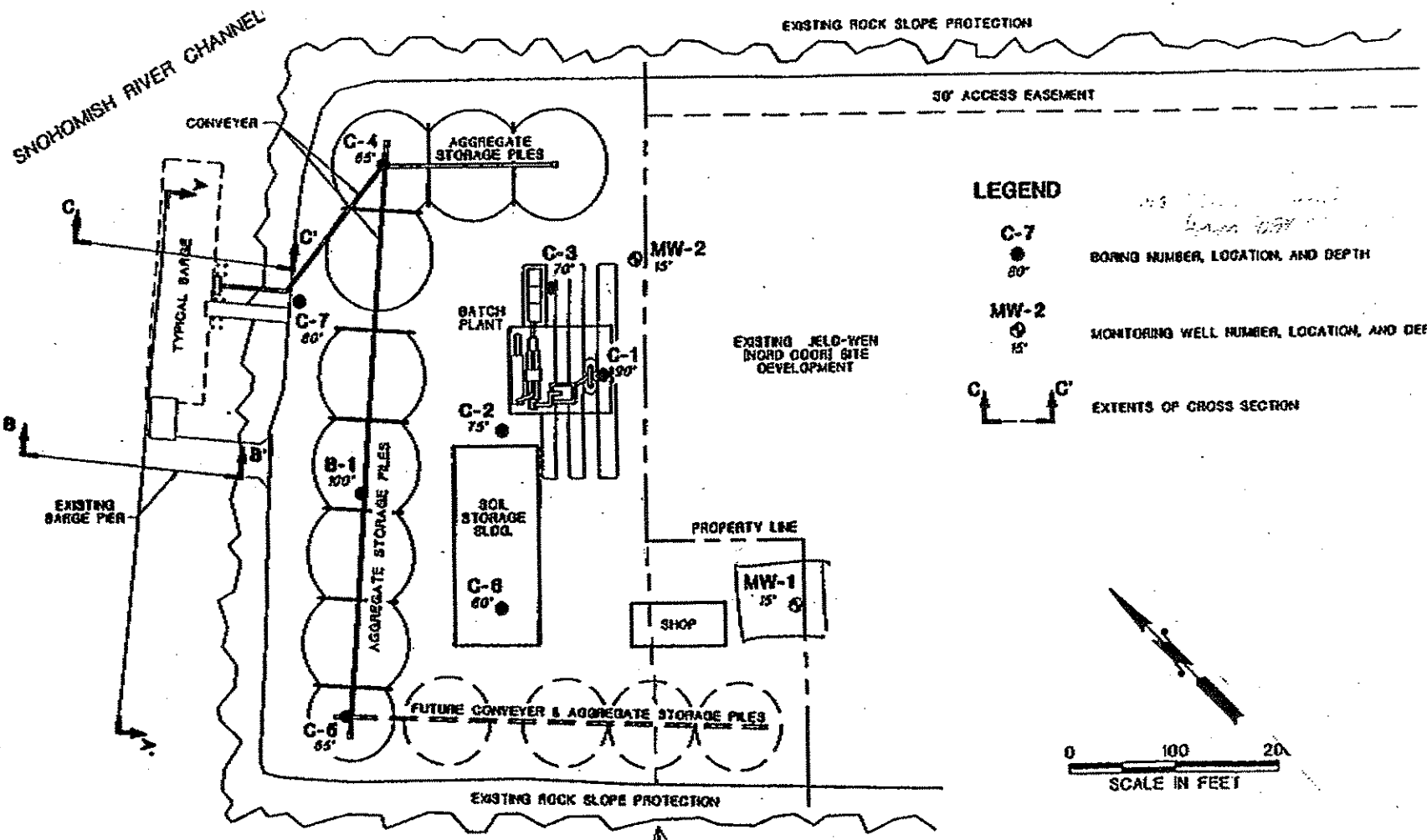

SNOHOMISH RIVER
SS-2
PROPERTY BOUNDARY
SNOHOMISH RIVER CHANNEL AND PORT GARDNER BAY - TIDEWATER
LUMBER SORTER
BOILER
FUEL BIN
WATER TANK
PLANT
AIR DRYING LUMBER STORAGE AREA
DRY KILNS
PLANER
1
2
GS-1
GS-2
GS-4
GS-3
DRY KILNS
DRY KILNS
ROCK RIP-RAP
SS-1
CARTON STORAGE
MAINTENANCE WAREHOUSE
N
SCALE IN FEET
0
100
200
Transformers

ATTACHMENT C

SCHEMATIC OF PROPOSED ASPHALT PLANT.
SOIL AND WATER SAMPLES INDICATED BY MW-1 AND MW-2.
ANALYTICAL:

MW-1
SOIL 700 ppm TPH
GROUNDWATER 16 ppm TPH

MW-2
GROUND WATER 1.2 ppm TPH



RZA AGRA, INC. *Engineering & Environmental Services* 11335 N.E. 122nd Way Suite 100 Kirkland, Washington 98034-6918	W.O. W-8390-2 DESIGN JFG DRAWN MJF DATE SEP 1992 SCALE 1"=100'	STERLING ASPHALT EVERETT, WASHINGTON SITE AND EXPLORATION PLAN FIGURE 2	

DRAWING NO. W8390-2\8E2.DWG

ATTACHMENT D

NARRATIVE AND SCHEMATIC OF 1978 E.I.S. PROPOSED RECLAIM AREA

D Major Physical and Engineering Aspects of the Proposal

Construction Phase I

The first phase of the project involves the placement of 198,800 cubic yards of fill on 11.2 acres of tideland owned by Nord immediately south of the existing factory (See Figures 4, and 5). The Nord Company anticipates obtaining the fill material from Snohomish River channel maintenance dredging. Because of competing uses of these river dredge spoils by the Port of Everett and others, Nord may not be able to utilize dredge spoils for its proposed fill. In this event Nord will be required to find another source of fill material. One possible source of fill may be Nord's own maintenance dredging which it will undertake to keep its recently constructed barge dock in operation. Periodic dredging will be required to maintain a channel for Nord's barges. Another potential source of fill material may be other private maintenance dredging in the area. Still another source of fill material could be large scale public or private construction projects which generate exported fill material.

The timetable for placement of fill for the Nord Expansion Project is therefore quite flexible, and will be determined by the availability of acceptable fill material. The Nord Company would like to commence the fill process shortly after all permits have been obtained so as to maximize its potential of receiving fill material from any or all sources.

The fill would create a finished ground elevation of + 15 feet above mean lower low water (MLLW). The fill will be contained on all waterward sides by a retention berm with a top elevation of + 15 feet MLLW. The retention berm is proposed to be composed of approximately 12,700 cubic yards of granular material, with a two foot rock riprap outer surface to protect the fill from wave action. The proposed fill area, together with the existing 3.8 acre upland, will create a total of about 15 acres of new land available for development. The 15 acre expansion area was purchased by the Nord Company in late 1976 in anticipation of this expansion project.

In December, 1976 the E.A. Nord Company submitted an application to the Army Corps of Engineers to fill the 11.2 acres of tideland. That application was later withdrawn. Upon completion of the state and local environmental review process, a new application for the proposed fill will be submitted. This will begin the federal review process for the project.

Construction Phase II

The second phase of the project consists of the expansion of the main factory building, support facilities, and parking area (See Figure 4).

The existing main factory building will be redesigned and reorganized on the interior to create more efficient use of the space. A new 363,600 square foot factory building will be constructed partially on the new fill area. Reinforced concrete piles will be driven into the fill to provide structural support for the building. The new building will be alligned parallel to Norton Avenue and perpendicular to the main production flow in the existing building. This new "L-shaped" configuration will permit the separation of the three major products - doors, louvers and turnings - into three separate production lines. Doors will be made in the new building, with production flowing northward toward finishing and shipping (See Figure 4).

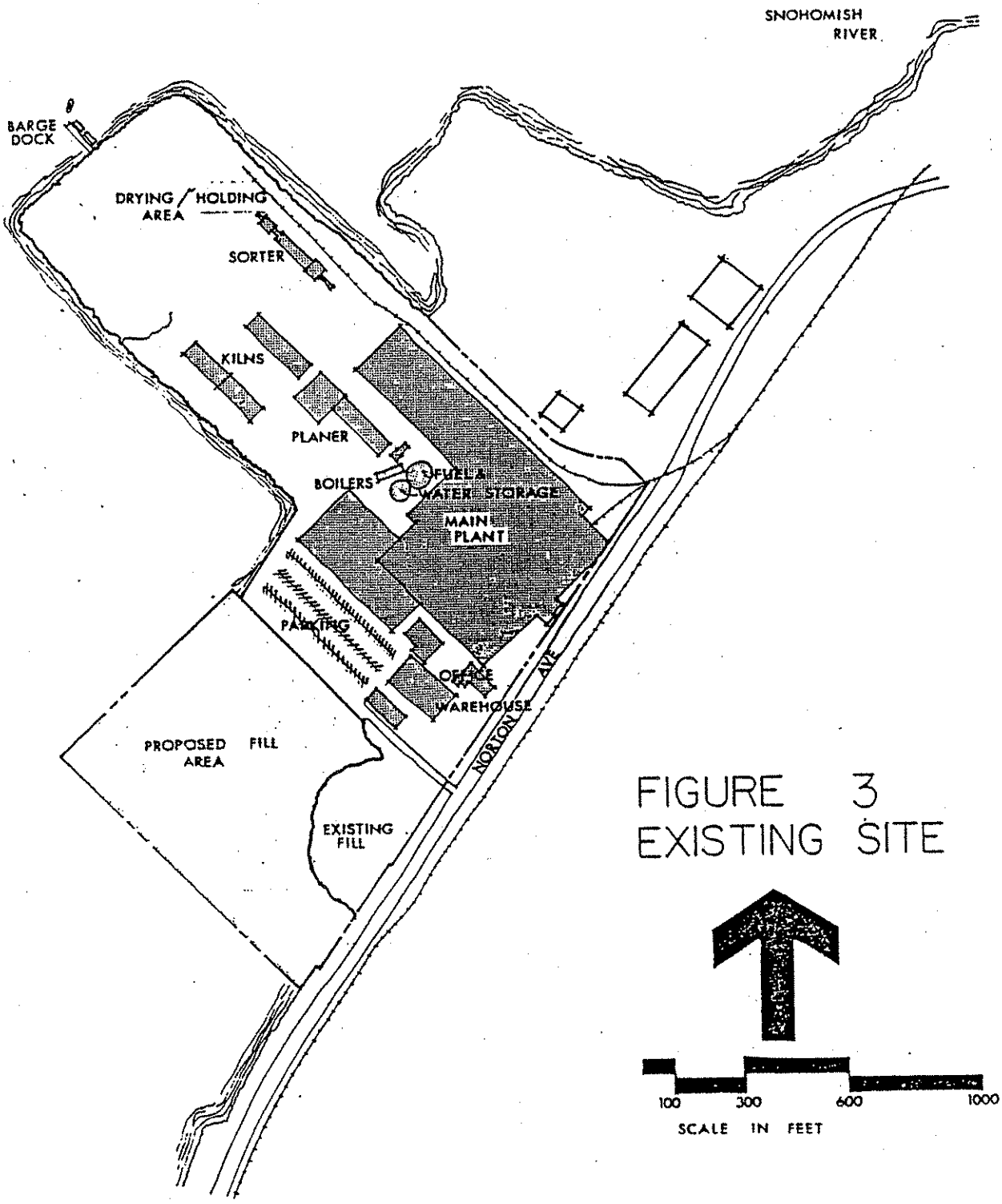
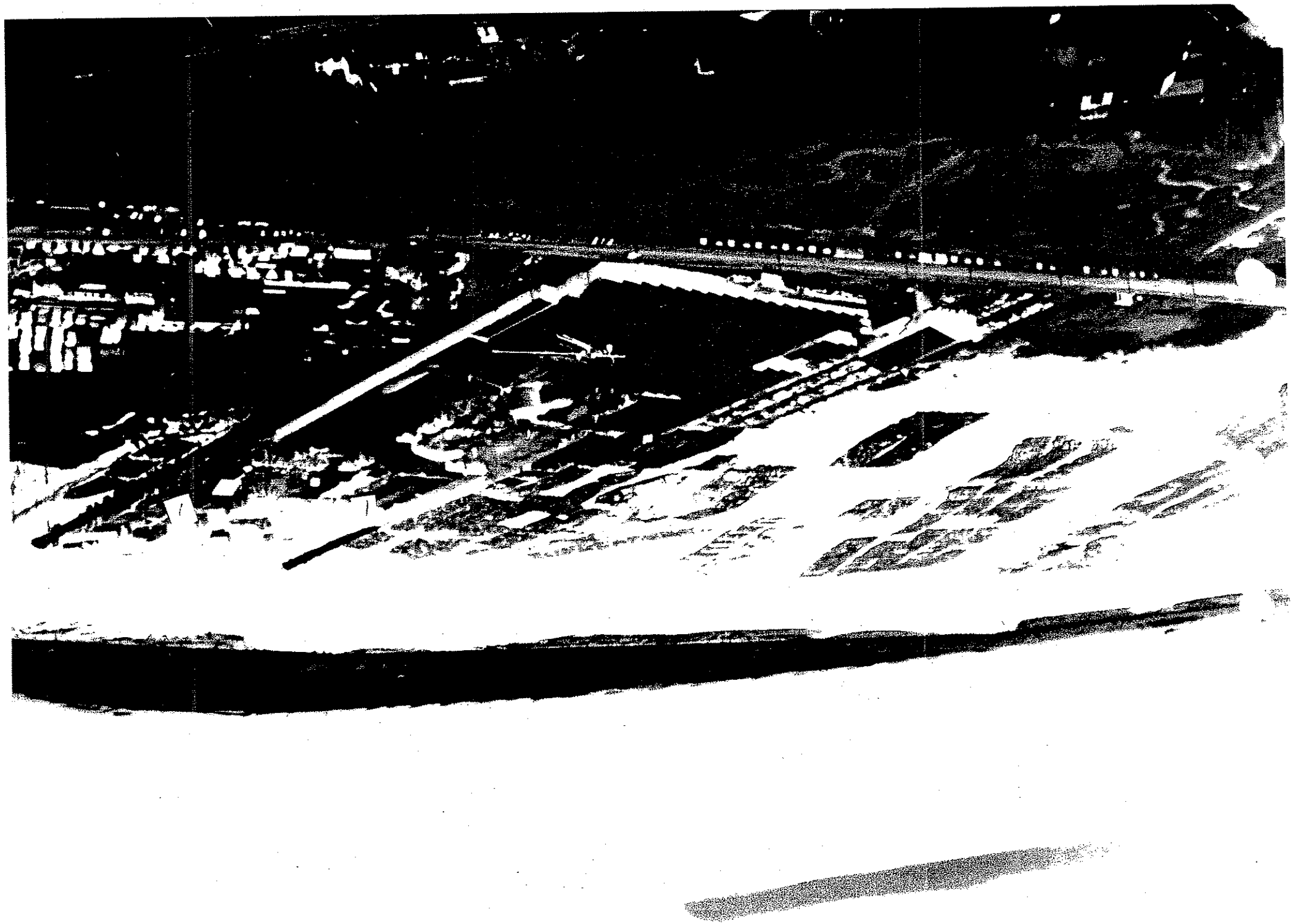


FIGURE 3
EXISTING SITE

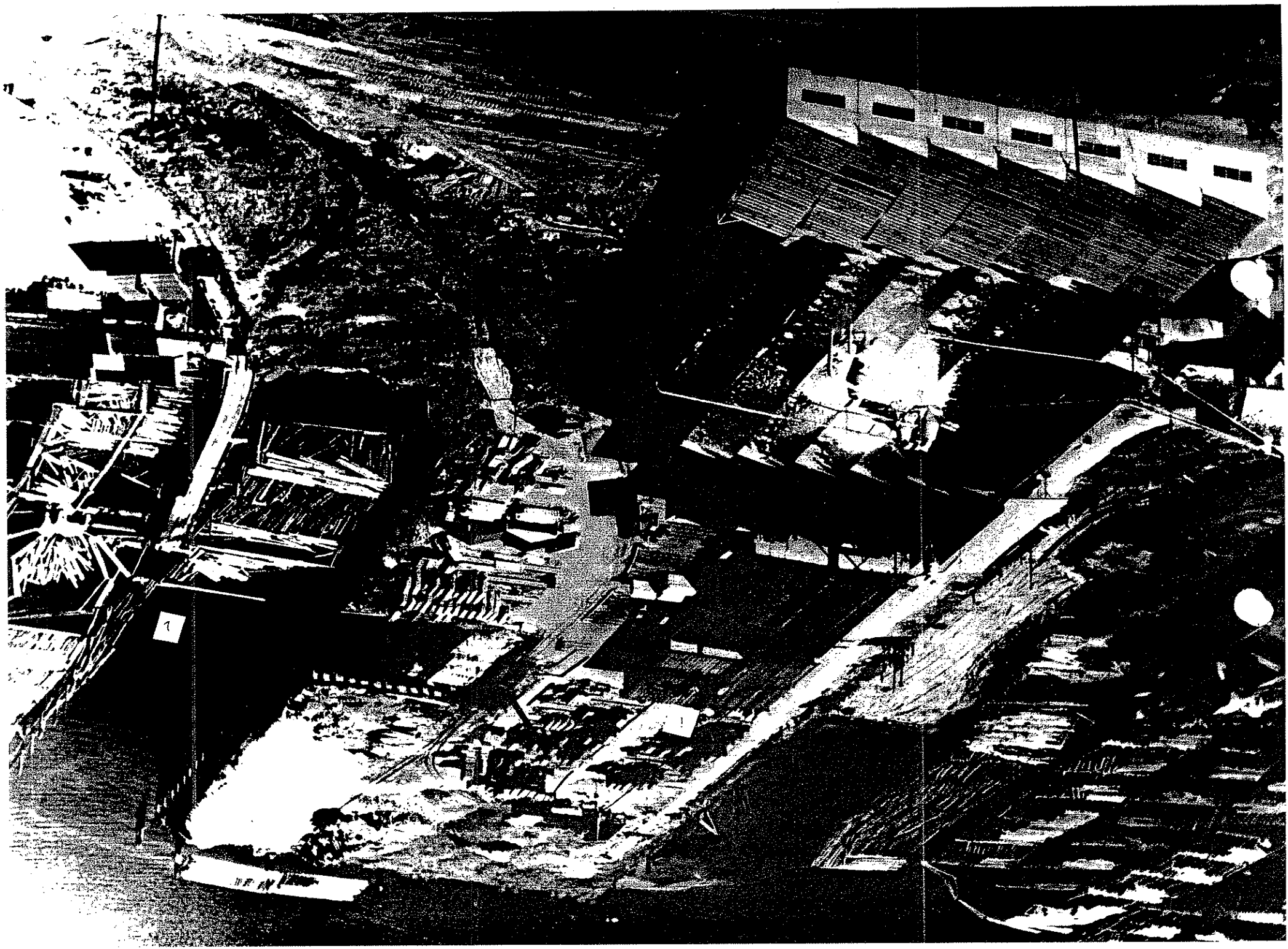
ATTACHMENT E

APPROXIMATELY 1965 PHOTO OF LOCATION. 1 AND 2 INDICATE EST. LOCATIONS OF MW-1 AND MW-2



ATTACHMENT F

ESTIMATED LOCATION MW-1 AND MW-2.
OCTOBER 1954 PHOTOGRAPH



ATTACHMENT G

ESTIMATED LOCATION MW-1 AND MW-2
APRIL 1947 PHOTOGRAPH

EXHIBIT E

TABLE 1 - Groundwater Analytical Summary Table
TPH
Former Nord Door Facility
Everett, Washington

			Hydrocarbon Identification [A] (mg/l)			Total Petroleum Hydrocarbons [E] (mg/l)		
Sample Location	**Sample Label**	**Sample Date**	TPH Gasoline [B]	TPH Diesel [C]	TPH Heavy Oil [D]	TPH-Gx Gasoline Range	TPH-Dx Diesel Range	TPH-Dx Heavy Oil Range
GP-1	GP1-GW	5/4/2006	ND (<0.238) [F]	ND (<0.600)	ND (<0.600)	-	-	-
GP-2	GP2-GW	5/4/2006	**DET**	ND (<0.600)	ND (<0.600)	-	-	-
GP-3	GP3-GW	5/4/2006	**DET**	ND (<0.600)	ND (<0.600)	-	-	-
GP-4	GP4-GW	5/11/2006	**DET**	**DET**	ND (<0.600)	**372**	ND (<0.238)	ND (<0.476)
GP-5	GP5-GW	5/4/2006	**DET**	**DET**	ND (<0.600)	-	-	-
GP-6	GP6-GW	5/2/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
GP-7	GP7-GW	5/2/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
GP-8	GP8-GW	5/2/2006	ND (<0.236)	ND (<0.594)	ND (<0.594)	-	-	-
GP-9	GP9-GW	5/1/2006	**DET**	**DET**	**DET**	**6.710**	**23.1**	ND (<0.943)
GP-10	GP10-GW	5/1/2006	**DET**	**DET**	**DET**	**9.140**	**41.8**	**5.94**
GP-11	GP11-GW	5/4/2006	**DET**	**DET**	**DET**	-	-	-
GP-12	GP12-GW	5/2/2006	ND (<0.236)	**DET**	ND (<0.594)	-	ND (<0.472)	ND (<0.943)
GP-13	GP13-GW	5/1/2006	**DET**	**DET**	**DET**	**0.179**	ND (<0.472)	ND (<0.943)
GP-14	GP14-GW	5/1/2006	**DET**	**DET**	**DET**	**0.292**	**10.9**	**1.24**
GP-15	GP15-GW	5/1/2006	**DET**	**DET**	ND (<0.594)	-	**1.33**	ND (<0.943)
GP-16	GP16-GW	5/1/2006	**DET**	**DET**	ND (<0.594)	-	**0.492**	ND (<0.943)
GP-17	GP17-GW	5/1/2006	ND (<0.236)	**DET**	ND (<0.594)	-	ND (<0.472)	ND (<0.943)
GP-18	GP18-GW	5/1/2006	ND (<0.236)	ND (<0.594)	ND (<0.594)	-	-	-
GP-19	GP19-GW	5/1/2006	ND (<0.236)	ND (<0.594)	ND (<0.594)	-	-	-
GP-20	GP20-GW	5/4/2006	ND (<0.238)	ND (<0.600)	**DET**	-	-	-
GP-21	GP21-GW	5/4/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
GP-22	GP22-GW	5/4/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
GP-23	GP23-GW	5/1/2006	ND (<0.236)	ND (<0.594)	ND (<0.594)	-	-	-
GP-24	GP24-GW	5/3/2006	ND (<0.238)	**DET**	**DET**	-	ND (<0.476)	**1.48**
GP-25	GP25-GW	Sample Held	-	-	-	-	-	-
GP-26	GP26-GW	5/3/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
GP-27	GP27-GW	5/3/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
GP-28	GP28-GW	Sample Held	-	-	-	-	-	-
GP-29	GP29-GW	5/4/2006	ND (<0.238)	ND (<0.600)	**DET**	-	-	-
GP-30	GP30-GW	Sample Held	-	-	-	-	-	-
GP-31	GP31-GW	5/3/2006	ND (<0.238)	**DET**	**DET**	-	-	-
GP-32	GP32-GW	Sample Held	-	-	-	-	-	-
GP-33	GP33-GW	5/3/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
GP-34	GP34-GW	5/3/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
GP-35	GP35-GW	5/4/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
GP-36	GP36-GW	5/3/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
GP-37	GP37-GW	5/2/2006	ND (<0.236)	ND (<0.594)	ND (<0.594)	-	-	-
GP-38	GP38-GW	5/2/2006	ND (<0.236)	ND (<0.594)	ND (<0.594)	-	-	-
GP-39	GP39-GW	5/2/2006	ND (<0.236)	ND (<0.594)	ND (<0.594)	-	-	-
GP-40	GP40-GW	5/2/2006	ND (<0.236)	ND (<0.594)	ND (<0.594)	-	-	-
GP-41	GP41-GW	5/2/2006	ND (<0.236)	ND (<0.594)	ND (<0.594)	-	-	-
GP-42	GP42-GW	5/2/2006	ND (<0.236)	ND (<0.594)	ND (<0.594)	-	-	-
November 2006								
MW1-1106	--	11/14/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
MW2-1106	--	11/14/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
MW3-1106	--	11/14/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
MW4-1106	--	11/14/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
MW5-1106	--	11/14/2006	ND (<0.238)	ND (<0.600)	ND (<0.600)	-	-	-
Preliminary Screening Level Values (SLVs)								
MTCA Method A Cleanup Levels for Ground Water [G]			NA	NA	NA	1.00 / 0.80 [J]	0.5	0.5
Oregon DEQ Risk-Based Concentrations Construction Worker / Excavation Worker Exposure Scenario [H]			NA	NA	NA	12	>S [K]	>S
Oregon DEQ Risk-Based Concentrations - Residential Vapor Intrusion into Building Exposure Scenario [I]			NA	NA	NA	>S	>S	>S

NOTES:

- = Not Sampled or Not Analyzed for specific constituent.

BOLD = Analytes detected at or above the laboratory method reporting limit.

A - Hydrocarbon Identification per NW-TPH Methodology.

B - Gasoline Range Hydrocarbons

C - Diesel Range Hydrocarbons

D - Heavy Oil Range Hydrocarbons

E - Hydrocarbon per NW-TPH-Gx and NW-TPH-Dx methodologies.

F - Not Detected (ND) at or above the laboratory Method Reporting Limit (MRL) of 0.238 mg/l (milligrams per liter).

G - Model Toxics Control Act (MTCA) - Cleanup Regulation, Table 740-1, Method A Groundwater Levels.

H - Screening value using Oregon's Risk-Based Concentration for Construction Work / Excavation Work exposure to TPH in groundwater (excavation).

I - Screening value using Oregon's Risk-Based Concentration for Residential exposure by vapor intrusion into building from TPH in groundwater.

J - Gasoline Range Organics 1,000 µg/l (1.00 mg/l) with no detectable benzene in groundwater, 800 µg/l (0.80 mg/l) is benzene if present in groundwater.

K - For this screening value exposure pathway, the groundwater RBC (value) exceeds the solubility limit. Free product would likely be present to exceed the screening value by this pathway.

= Value exceeds one or more of the Screening Level Values

TABLE 3 - Groundwater Analytical Summary Table
SVOCs and PAHs
Former Nord Door Facility
Everett, Washington

Sample Location	Sample Label	Sample Date	Semivolatile Organic Compounds (SVOCs) [A] and Polynuclear Aromatic Compounds (PAHs) [B] (µg/l)																					
			Carbazole	Acenaphthene	Anthracene	Benzo(a) anthracene	Benzo(a) pyrene	Benzo(b) fluoranthene	Benzo(ghi) perylene	Benzo(k) fluoranthene	Chrysene	Dibenzofuran	2,4-Dimethyl phenol	Fluoranthene	Fluorene	Indeno (1,2,3-cd) pyrene	2-Methyl naphthalene	2-Methyl-phenol	3-, 4-Methylphenol	Naphthalene	Nitrobenzene	Penta-chlorophenol	Phenanthrene	Phenol	Pyrene
GP-1	GP1-GW	5/4/2006	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	ND (<0.952) [C]	-	-	-
GP-3	GP3-GW	5/4/2006	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	ND (<0.943) [C]	-	-	-
GP-4	GP4-GW	5/11/2006	ND (<4.72) [D]	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND (<9.43)	ND(<4.72)	ND(<4.72)	ND(<4.72)	ND (<9.43)	ND(<4.72)	ND(<4.72)	ND(<4.72)
GP-6	GP6-GW	5/2/2006	-	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	-	-	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	-	-	-	ND (<0.0952)	-	ND (<0.952)	ND (<0.0952)	-	ND (<0.0952)
GP-7	GP7-GW	5/2/2006	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)
GP-9	GP9-GW	5/1/2006	**681**	**859**	**271**	**100**	**61.6**	**59.4**	ND (<47.2)	**56.3**	**167**	**425**	**3,890**	**469**	**504**	ND (<47.2)	**1,250**	**331**	**492**	**13,900**	ND (<47.2)	ND (<94.3)	**1,090**	**251**	**423**
GP-10	GP10-GW	5/1/2006	**499**	**1,130**	**221**	**226**	**163**	**157**	ND (<94.3)	**149**	**178**	**599**	**10,300**	**1,050**	**779**	ND (<94.3)	**1,100**	ND (<189)	**228**	**12,200**	ND (<94.3)	ND (<189)	**2,090**	ND (<94.3)	**883**
GP-11	GP11-GW	5/4/2006	-	**289**	**56.6**	**11.8**	**6.65**	**7.05**	ND (<4.76)	**5.64**	**22.8**	-	-	**66.0**	154	ND (<4.76)	-	-	-	**7,920**	-	-	**231**	-	**48.9**
GP-12	GP12-GW	5/2/2006	**5.35**	**63.3**	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	**22.4**	ND (<9.43)	**16.2**	**35.5**	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	**24.4**	ND (<4.72)	**15.5**
GP-13	GP13-GW	5/1/2006	**9.57**	**60.2**	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	**10.0**	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)
GP-14	GP14-GW	5/1/2006	**54.1**	**401**	ND (<47.6)	ND (<47.6)	ND (<47.6)	ND (<47.6)	ND (<47.6)	ND (<47.6)	ND (<47.6)	**127**	ND (<95.2)	**89.2**	**166**	ND (<47.6)	**184**	ND (<95.2)	ND (<47.6)	**948**	ND (<47.6)	ND (<95.2)	**306**	ND (<47.6)	**59.2**
GP-15	GP15-GW	5/1/2006	**163**	**517**	**6.18**	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	**206**	ND (<9.43)	**12.2**	**200**	ND (<4.72)	**55.2**	ND (<4.72)	ND (<4.72)	**7.88**	ND (<4.72)	ND (<9.43)	**84.4**	ND (<4.72)	**7.04**
GP-16	GP16-GW	5/1/2006	ND (<4.72)	**252**	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	**12.3**	ND (<4.72)	ND (<4.72)	**100**	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	**33.3**	ND (<4.72)	ND (<4.72)
GP-17	GP17-GW	5/1/2006	ND (<4.72)	**52.4**	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	**8.62**	ND (<4.72)	**8.55**	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)
GP-18	GP18-GW	5/1/2006	-	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	-	-	**0.185**	ND (<0.0943)	ND (<0.0943)	-	-	-	**0.0960**	-	-	**0.119**	-	**1.31**
GP-19	GP19-GW	5/1/2006	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)
GP-22	GP22-GW	5/4/2006	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)
GP-23	GP23-GW	5/1/2006	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)
GP-24	GP24-GW	5/3/2006	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)
GP-27	GP27-GW	5/3/2006	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)
GP-29	GP29-GW	5/4/2006	ND (<4.72)	**11.7**	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)
GP-31	GP31-GW	5/3/2006	-	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	-	-	ND (<0.0952)	ND (<0.0952)	ND (<0.0952)	-	-	-	ND (<0.0952)	-	-	ND (<0.0952)	-	ND (<0.0952)
GP-34	GP34-GW	5/3/2006	ND (<190)	ND (<190)	ND (<190)	ND (<190)	ND (<190)	ND (<190)	ND (<190)	ND (<190)	ND (<190)	ND (<190)	ND (<381)	ND (<190)	ND (<190)	ND (<190)	ND (<190)	ND (<381)	ND (<190)	ND (<190)	ND (<190)	ND (<381)	ND (<190)	ND (<190)	ND (<190)
GP-35	GP35-GW	5/4/2006	-	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	-	-	ND (<0.0943)	ND (<0.0943)	ND (<0.0943)	-	-	-	**0.397**	-	-	ND (<0.0943)	-	ND (<0.0943)
GP-36	GP36-GW	5/3/2006	ND (<4.72)	**4.78**	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)	ND (<9.43)	ND (<4.72)	ND (<4.72)	ND (<4.72)
GP-41	GP41-GW	5/2/2006	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)
GP-42	GP42-GW	5/2/2006	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)	ND (<9.52)	ND (<4.76)	ND (<4.76)	ND (<4.76)
November 2006																									
MW1-1106	-	11/14/2006	ND (<4.95)	ND (<4.95)	ND (<4.95)	ND (<4.95)	ND (<4.95)	ND (<4.95)	ND (<4.95)	ND (<4.95)	ND (<4.95)	ND (<4.95)	ND (<9.90)	ND (<4.95)	ND (<4.95)	ND (<4.95)	ND (<4.95)	ND (<9.90)	ND (<4.95)	ND (<4.95)	ND (<4.95)	ND (<9.90)	ND (<4.95)	ND (<4.95)	ND (<4.95)
MW2-1106	-	11/14/2006	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<9.80)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<9.80)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<9.80)	ND (<4.90)	ND (<4.90)	ND (<4.90)
MW3-1106	-	11/14/2006	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<9.80)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<9.80)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<9.80)	ND (<4.90)	ND (<4.90)	ND (<4.90)
MW4-1106	-	11/14/2006	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<9.80)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<9.80)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<9.80)	ND (<4.90)	ND (<4.90)	ND (<4.90)
MW5-1106	-	11/14/2006	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<9.80)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<9.80)	ND (<4.90)	ND (<4.90)	ND (<4.90)	ND (<9.80)	ND (<4.90)	ND (<4.90)	ND (<4.90)
Preliminary Screening Level Values (SLVs)																									
MTCA Method A Cleanup Levels for Ground Water [E]			NP [H]	NP	NP	0.1	0.1	0.1	NP	0.1	0.1	NP	NP	NP	NP	0.1	160	NP	NP	160	NP	NP	NP	NP	NP
EPA Region 9 PRG - Tap Water Value [F]			3.4	370	1,800	0.092	0.0092	0.092	NP	0.920	9.20	730	730	1,500	240	0.092	NP	1,800	NP	6.2	3.4	0.56	NP	11,000	180
Oregon DEQ Risk-Based Concentrations Construction Worker / Excavation Worker Exposure Scenario [G]			NP	>S [I]	>S	9.1	>S	>S	NP	>S	>S	NP	NP	>S	>S	>S	NP	NP	NP	680	NP	NP	NP	NP	>S

NOTES:

Of the 66 Semi-Volatile Organic Compounds (SVOCs) analytes quantified by the EPA 8270C analysis, only those analytes with one or more detections are listed. See attached laboratory report.

Of the 17 Polynuclear Aromatic Compounds (PAHs) and Pentachlorophenol per EPA Method 8270M-SIM, only those analytes with one or more detections are listed. See attached laboratory report.

- = Not Sampled or Not Analyzed for specific constituent.

BOLD = Analytes detected at or above the laboratory method reporting limit (MRL).

A - Semivolatile Organic Compounds (SVOCs) per EPA Method 8270C.

B - Polynuclear Aromatic Compounds (PAHs) and Pentachlorophenol per EPA Method 8270M-SIM.

C - Pentachlorophenol (PCP) per EPA Method 8270M-SIM.

D - Not Detected (ND) at or above the laboratory Method Reporting Limit (MRL) of 4.72 µg/l (micrograms per liter).

E - Model Toxics Control Act (MTCA) - Cleanup Regulation, Table 720-1, Method A Cleanup Levels for Ground Water (cleanup levels for drinking water as beneficial use).

F - EPA Region 9 Preliminary Remediation Goals (PRGs), October 2004 - tap water screening value.

G - Screening value using Oregon's Risk-Based Concentration for Construction Work / Excavation Work exposure to groundwater (excavation).

H - Value Not Provided.

I - For this screening value exposure pathway, the groundwater RBC (value) exceeds the solubility limit. Free product would likely be present to exceed the screening value by this pathway.

= Value exceeds one or more of the Screening Level Values

TABLE 4 - Soil Analytical Summary Table
SVOCs and PAHs
Former Nord Door Facility
Everett, Washington

Sample Location	Sample Label	Sample Depth (feet)	Sample Date	Semivolatile Organic Compounds (SVOCs) [A] and Polynuclear Aromatic Compounds (PAHs) [B] (mg/kg)																						
				Carbazole	Acenaphthene	Anthracene	Benzo(a) anthracene	Benzo(a) pyrene	Benzo(b) fluoranthene	Benzo(ghi) perylene	Benzo(k) fluoranthene	Chrysene	Dibenzo(a,h) anthracene	Dibenzofuran	2,4-Dimethyl phenol	Fluoranthene	Fluorene	Indeno (1,2,3-cd) pyrene	2-Methyl naphthalene	2-Methylphenol	3-, 4-Methylphenol	Naphthalene	Nitrobenzene	Pentachloro-phenol [C]	Phenanthrene	Phenol	Pyrene
GP-1	GP1-10	10.0	5/4/2006	ND (<3.80) [D]	**6.96**	ND (<3.80)	**4.26**	ND (<3.80)	ND (<3.80)	ND (<3.80)	ND (<3.80)	**4.70**	ND (<3.80)	**4.85**	ND (<11..5)	**18.9**	**9.77**	ND (<3.80)	ND (<3.80)	ND (<3.80)	ND (<3.80)	ND (<3.80)	ND (<3.80)	ND (<11.5)	**34.0**	ND (<3.80)	**14.4**
GP-4	GP4-4.5	4.5	5/11/1006	-	**0.038.9**	ND(<0.0214)	ND(<0.0214)	ND(<0.0214)	ND(<0.0214)	ND(<0.0214)	ND(<0.0214)	ND(<0.0214)	ND(<0.0214)	-	-	ND(<0.0214)	ND(<0.0214)	ND(<0.0214)	-	-	-	ND(<0.0214)	-	**0.166**	ND(<0.0214)	-	ND(<0.0214)
GP-5	GP5-6.5	6.5	5/4/2006	-	**1.920**	**0.279**	ND (<0.154)	ND (<0.154)	ND (<0.154)	ND (<0.154)	ND (<0.154)	ND (<0.154)	ND (<0.154)	-	-	**0.873**	**1.570**	ND (<0.154)	-	-	-	**0.221**	-	ND (<0.769)	**4.020**	-	**0.422**
GP-9	GP9-6	6.0	5/1/2006	**232**	**499**	**460**	**137**	ND (<88.8)	ND (<88.8)	ND (<88.8)	ND (<88.8)	**201**	ND (<88.8)	**276**	ND (<269)	**577**	**421**	ND (<88.8)	**362**	ND (<88.8)	ND (<88.8)	**1,060**	ND (<88.8)	ND (<269)	**1,080**	ND (<88.8)	**496**
GP-9	GP9-12	12.0	5/1/2006	-	**118**	**31.8**	**40.1**	**26.3**	**30.6**	**11.0**	**17.7**	**30.2**	ND (<6.47)	-	-	**171**	**99.6**	**10.1**	-	-	-	**294**	-	ND (<32.4)	**318**	-	**119**
GP-10	GP10-3	3.0	5/1/2006	**47.0**	ND (<15.3)	**156**	**18.7**	**48.5**	**53.2**	**39.8**	**40.8**	**59.1**	ND (<15.3)	ND (<15.3)	ND (<46.4)	**19.6**	ND (<15.3)	**30.0**	ND (<15.3)	ND (<15.3)	ND (<15.3)	ND (<15.3)	ND (<15.3)	ND (<46.4)	**24.3**	ND (<15.3)	**30.4**
GP-10	GP10-11	11.0	5/1/2006	-	**10.1**	**31.9**	**34.5**	**20.9**	**25.0**	**8.01**	**13.8**	**35.4**	ND (<6.94)	-	-	**155**	**90.1**	**7.14**	-	-	-	**238**	-	ND (<34.7)	**301**	-	**115**
GP-11	GP11-12	12.0	5/4/2006	-	**113**	**28.2**	**33.6**	**20.2**	**20.2**	ND (<8.36)	**17.9**	**27**	ND (<8.36)	-	-	**159**	**91.8**	ND (<8.36)	-	-	-	**292**	-	ND (<41.8)	**29.4**	-	**97.3**
GP-12	GP12-8	8.0	5/2/2006	ND (84.2)	**287**	**185**	**152**	**104**	**92.8**	ND (84.2)	**102**	**261**	ND (84.2)	**143**	ND (<255)	**629**	**271**	ND (84.2)	ND (84.2)	ND (84.2)	ND (84.2)	ND (84.2)	ND (84.2)	ND (<255)	**705**	ND (84.2)	**577**
GP-13	GP13-11.5	11.5	5/1/2006	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<0.404)	ND (<1.22)	ND (<0.404)	ND (<0.404)	ND (<0.404)
GP-14	GP14-6	6.0	5/1/2006	**8.14**	**26.6**	**21.9**	**6.77**	ND (<4.25)	ND (<4.25)	ND (<4.25)	ND (<4.25)	**7.83**	ND (<4.25)	**15.6**	ND (<12.9)	**32.8**	**24.4**	ND (<4.25)	**14.8**	ND (<4.25)	ND (<4.25)	**38.0**	ND (<4.25)	ND (<12.9)	**59.9**	ND (<4.25)	**24.0**
GP-15	GP15-10	10.0	5/1/2006	**3.34**	**1.28**	ND (<0.388)	ND (<0.388)	ND (<0.388)	ND (<0.388)	ND (<0.388)	ND (<0.388)	ND (<0.388)	ND (<0.388)	**1.52**	ND (<1.18)	**0.937**	**2.83**	ND (<0.388)	ND (<0.388)	ND (<0.388)	ND (<0.388)	**0.447**	ND (<0.388)	ND (<1.18)	**1.83**	ND (<0.388)	**0.660**
GP-16	GP16-8	8.0	5/1/2006	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<0.823)	ND (<2.49)	ND (<0.823)	ND (<0.823)	ND (<0.823)
GP-17	GP17-5	5.0	5/1/2006	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<0.734)	ND (<2.22)	ND (<0.734)	ND (<0.734)	ND (<0.734)
GP-18	GP18-8	8.0	5/1/2006	-	ND (<0.0162)	ND (<0.0162)	ND (<0.0162)	ND (<0.0162)	**0.0250**	ND (<0.0162)	ND (<0.0162)	**0.0164**	ND (<0.0162)	-	-	**0.0292**	ND (<0.0162)	ND (<0.0162)	-	-	-	ND (<0.0162)	-	ND (<0.0812)	ND (<0.0162)	-	**0.0721**
GP-22	GP22-6.5	6.5	5/4/2006	-	**0.0373**	**0.0313**	**0.125**	**0.170**	**0.194**	**0.111**	**0.110**	**0.140**	**0.0327**	-	-	**0.354**	**0.0185**	**0.0997**	-	-	-	**0.0185**	-	ND (<0.0791)	**0.120**	-	**0.227**
GP-24	GP24-6	6.0	5/3/2006	-	ND (<0.0289)	ND (<0.0289)	**0.0950**	**0.112**	**0.0843**	**0.0741**	**0.0957**	**0.119**	ND (<0.0289)	-	-	**0.190**	ND (<0.0289)	**0.0650**	-	-	-	**0.0492**	-	ND (<0.144)	**0.111**	-	**0.175**
GP-29	GP29-8	8.0	5/4/2006	-	**0.216**	**0.520**	**0.459**	**0.534**	**0.681**	**0.406**	**0.323**	**0.626**	**0.120**	-	-	**1.3**	**0.253**	**0.347**	-	-	-	**0.360**	-	**7.4**	**1.27**	-	**0.856**
GP-34	GP34-8	8.0	5/3/2006	-	ND (<0.152)	ND (<0.152)	ND (<0.152)	ND (<0.152)	**0.375**	**0.175**	ND (<0.152)	**0.497**	ND (<0.152)	-	-	**0.184**	ND (<0.152)	ND (<0.152)	-	-	-	ND (<0.152)	-	ND (<0.758)	**0.211**	-	**0.216**
GP-37	GP37-8	8.0	5/2/2006	-	ND (<0.0335)	ND (<0.0335)	ND (<0.0335)	ND (<0.0335)	ND (<0.0335)	ND (<0.0335)	ND (<0.0335)	ND (<0.0335)	ND (<0.0335)	-	-	ND (<0.0335)	ND (<0.0335)	ND (<0.0335)	-	-	-	**0.0355**	-	ND (<167)	**0.041**	-	ND (<0.0335)
GP-39	GP39-9	9.0	5/2/2006	-	ND (<0.0296)	ND (<0.0296)	ND (<0.0296)	ND (<0.0296)	ND (<0.0296)	ND (<0.0296)	ND (<0.0296)	ND (<0.0296)	ND (<0.0296)	-	-	ND (<0.0296)	ND (<0.0296)	ND (<0.0296)	-	-	-	ND (<0.0296)	-	ND (<0.148)	ND (<0.0296)	-	ND (<0.0296)
GP-41	GP41-8	8.0	5/2/2006	-	ND (<0.749)	ND (<0.749)	ND (<0.749)	ND (<0.749)	ND (<0.749)	ND (<0.749)	ND (<0.749)	ND (<0.749)	ND (<0.749)	-	-	ND (<0.749)	ND (<0.749)	ND (<0.749)	-	-	-	ND (<0.749)	-	ND (<0.374)	ND (<0.749)	-	ND (<0.749)
GP-42	GP42-8	8.0	5/2/2006	-	ND (<0.0705)	ND (<0.0705)	ND (<0.0705)	ND (<0.0705)	ND (<0.0705)	ND (<0.0705)	ND (<0.0705)	ND (<0.0705)	ND (<0.0705)	-	-	ND (<0.0705)	ND (<0.0705)	ND (<0.0705)	-	-	-	ND (<0.0705)	-	ND (<0.352)	ND (<0.0705)	-	ND (<0.0705)
Preliminary Screening Level Values (SLVs)																										
MTCA Method A Soil Cleanup Levels for Unrestricted Land Uses [E]				NP [H]	NP	NP	0.1	0.1	0.1	NP	0.1	0.1	0.1	NP	NP	NP	NP	0.1	5	NP	NP	5	NP	NP	NP	NP	NP
EPA Region 9 PRG - Residential Soil Values [F]				24	3,700	22,000	0.62	0.062	0.62	NP	6.2	62	0.062	150	1,200	2,300	2,700	0.62	NP	3,100	NP	56	20	3.0	NP	18,000	2,300
Oregon DEQ Risk-Based Concentrations Residential Scenario - Ingestion, Dermal Contact, and Inhalation [G]				NP	2,900 [I]	21,000 [I]	0.62	0.062	0.62	NP	6.2	62 [I]	0.062	NP	NP	2,300 [I]	2,600 [I]	0.62 [I]	NP	NP	NP	34	NP	NP	NP	NP	1,700 [I]

NOTES:

Of the 66 Semi-Volatile Organic Compounds (SVOCs) analytes quantified by the EPA 8270C analysis, only those analytes with one or more detections are listed. See attached laboratory report.

Of the 17 Polynuclear Aromatic Compounds (PAHs) and Pentachlorophenol per EPA Method 8270M-SIM, only those analytes with one or more detections are listed. See attached laboratory report.

- = Not Sampled or Not Analyzed for specific constituent.

BOLD = Analytes detected at or above the laboratory method reporting limit (MRL).

A - Semivolatile Organic Compounds (SVOCs) per EPA Method 8270C.

B - Polynuclear Aromatic Compounds (PAHs) and Pentachlorophenol per EPA Method 8270M-SIM.

C - Pentachlorophenol (PCP) per EPA Method 8270M-SIM.

D - Not Detected (ND) at or above the laboratory Method Reporting Limit (MRL) of 3.80 mg/kg (milligrams per kilograms - dry).

E - Model Toxics Control Act (MTCA) - Cleanup Regulation, Table 740-1, Method A Soil Cleanup Levels for Unrestricted Land Uses.

F - EPA Region 9 Preliminary Remediation Goals (PRGs), October 2004 - residential soil screening value.

G - Screening value using Oregon's Risk-Based Concentration for residential receptor scenario (surface soil ingestion, dermal contact, and inhalation).

H - Value Not Provided.

I - This soil RBC exceeds the limit of three-phase equilibrium partitioning. Soil concentrations in excess of this RBC indicate that free product might be present.

= Value exceeds one or more of the Screening Level Values

TABLE 5 - Groundwater Analytical Summary Table
VOCs
Former Nord Door Facility
Everett, Washington

Sample Location	Sample Label	Sample Date	Volatile Organic Compounds (VOCs) [A] (µg/l) Benzene	Ethylbenzene	Naphthalene	Toluene	1,2,4-Trimethyl benzene	Xylenes [B]
GP-2	GP2-GW	5/4/2006	ND (<1.00) [C]	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-3	GP3-GW	5/4/2006	ND (<500)	ND (<500)	ND (<1,000)	**60,300**	ND (<500)	ND (<1,500)
GP-5	GP5-GW	5/4/2006	**3.13**	**4.21**	**11.6**	ND (<1.00)	**1.95**	**5.47**
GP-9	GP9-GW	5/1/2006	ND (<100)	ND (<100)	**17,400**	**125**	ND (<100)	ND (<300)
GP-10	GP10-GW	5/1/2006	**103**	ND (<100)	**13,800**	**125**	ND (<100)	ND (<300)
GP-12	GP12-GW	5/2/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-13	GP13-GW	5/1/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-14	GP14-GW	5/1/2006	ND (<5.00)	ND (<5.00)	**800**	ND (<5.00)	ND (<5.00)	ND (<15.00)
GP-19	GP19-GW	5/1/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-21	GP21-GW	5/4/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-22	GP22-GW	5/4/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-23	GP23-GW	5/1/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-24	GP24-GW	5/3/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-27	GP27-GW	5/3/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-29	GP29-GW	5/4/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-31	GP31-GW	5/3/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-34	GP34-GW	5/3/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-35	GP35-GW	5/4/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-36	GP36-GW	5/3/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-41	GP41-GW	5/2/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
GP-42	GP42-GW	5/2/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
November 2006								
MW1-1106	-	11/14/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
MW2-1106	-	11/14/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
MW3-1106	-	11/14/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
MW4-1106	-	11/14/2006	ND (<1.00)	ND (<1.00)	ND (<2.00)	ND (<1.00)	ND (<1.00)	ND (<3.00)
MW5-1106	-	11/14/2006	**9.46**	ND (<1.00)	**11.1**	**4.12**	ND (<1.00)	**1.05**
Preliminary Screening Level Values (SLVs)								
MTCA Method A Cleanup Levels for Ground Water [D]			5	700	160	1,000	NP [H]	1,000
EPA Region 9 PRG - Tap Water Value [E]			0.35	1,300	6.2	720	12	210
Oregon DEQ Risk-Based Concentrations Construction Worker / Excavation Worker Exposure Scenario [F]			1,700	>S [I]	680	78,000	1,300	22,000
Oregon DEQ Risk-Based Concentrations - Residential Vapor Intrusion into Building Exposure Scenario [G]			160	>S	29,000	210,000	4,300	59,000

NOTES:

Of the 65 Volatile Organic Compounds (VOCs) analytes quantified by the EPA 8260B analysis, only those analytes with one or more detections are listed. See the attached laboratory report.

BOLD = Analytes detected at or above the laboratory method reporting limit (MRL).

A - Volatile Organic Compounds (VOCs) per EPA Method 8260C.

B - The sum of o-xylene and m,p-xylene.

C - Not Detected (ND) at or above the laboratory Method Reporting Limit (MRL) of 1.00 µg/l (micrograms per liter).

D - Model Toxics Control Act (MTCA) - Cleanup Regulation, Table 720-1, Method A Cleanup Levels for Ground Water (cleanup levels for drinking water as beneficial use).

E - EPA Region 9 Preliminary Remediation Goals (PRGs), October 2004 - tap water screening value.

F - Screening value using Oregon's Risk-Based Concentration for Construction Work / Excavation Work exposure to groundwater (excavation).

G - Screening value using Oregon's Risk-Based Concentration for Residential exposure by vapor intrusion into building from groundwater.

H - Value Not Provided.

I - For this screening value exposure pathway, the groundwater RBC (value) exceeds the solubility limit. Free product would likely be present to exceed the screening value by this pathway.

= Value exceeds one or more of the Screening Level Values

TABLE 6 - Soil Analytical Summary Table
VOCs
Former Nord Door Facility
Everett, Washington

				Volatile Organic Compounds (VOCs) [A] (µg/kg)					
Sample Location	**Sample Label**	**Sample Depth (feet)**	**Sample Date**	Benzene	Ethylbenzene	Naphthalene	Toluene	1,2,4-Trimethyl benzene	Xylenes [B]
GP-3	GP3-9	9.0	5/4/2006	ND (<125) [C]	ND (<623)	ND (<1,250)	**71,000**	ND (<623)	ND (<1,873)
GP-14	GP14-6	6.0	5/1/2006	ND (<125)	ND (<624)	**58,600**	ND (<624)	ND (<624)	ND (<1,874)
GP-34	GP34-8	8.0	5/3/2006	ND (<22.5)	ND (<113)	ND (<225)	ND (<113)	ND (<113)	ND (<338)
Preliminary Screening Level Values (SLVs)									
MTCA Method A Soil Cleanup Levels for Unrestricted Land Use [D]				30	6,000	5,000	7,000	NP	9,000
MTCA Priority Contaminants of Concern (MTCA Table 749-2) Simplified Terrestrial Ecological Evaluation Procedure [E]				NP [H]	NP	NP	NP	NP	NP
EPA Region 9 PRG - Residential Soil Values [F]				640	400,000	56,000	520,000	52,000	270,000
Oregon DEQ Risk-Based Concentrations - Residential Vapor Intrusion into Building Exposure Scenario [G]				68	>S [I]	290,000	180,000	70,000	110,000

NOTES:

Of the 65 Volatile Organic Compounds (VOCs) analytes quantified by the EPA 8260B analysis, only those analytes with one or more detections are listed. See attached lab report.

BOLD = Analytes detected at or above the laboratory method reporting limit (MRL).

A - Volatile Organic Compounds (VOCs) per EPA Method 8260C.

B - The sum of o-xylene and m,p-xylene.

C - Not Detected (ND) at or above the laboratory Method Reporting Limit (MRL) of 125 µg/kg (micrograms per kilogram).

D - Model Toxics Control Act (MTCA) - Cleanup Regulation, Table 740-1, Method A Soil Cleanup Levels for Unrestricted Land Uses.

E - Model Toxics Control Act (MTCA) - Priority Contaminants of Ecological Concern for Site that Qualify for the Simplified Terrestrial Ecological Evaluation Process, Table 749-2.

F - EPA Region 9 Preliminary Remediation Goals (PRGs), October 2004 - residential soil screening value.

G - Screening value using Oregon's Risk-Based Concentration for Residential exposure by vapor intrusion into building.

H - Value Not Provided.

I - For this screening value exposure pathway, the groundwater RBC value exceeds the solubility limit. Free product would likely be present to exceed the screening value by this pathway.

= Value exceeds one or more of the Screening Level Values

TABLE 7 - Groundwater and Soil Analytical Summary Table
PCBs
Former Nord Door Facility
Everett, Washington

SOIL				Polychlorinated Biphenyls [A] (µg/kg)						
Sample Location	**Sample Label**	**Sample Depth (feet)**	**Sample Date**	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
GP34	GP34-8	8.0	5/3/2006	ND (<37.6) [B]	ND (75.6)	ND (<37.6)	ND (<37.6)	ND (<37.6)	ND (<37.6)	ND (<37.6)
Preliminary Screening Level Values (SLVs)										
MTCA Method A - Unrestricted Land Use [C]				10,000	10,000	10,000	10,000	10,000	10,000	10,000
EPA Region 9 PRG - Residential Soil Values [D]				3,900	220	220	220	220	220	220

GROUNDWATER			Polychlorinated Biphenyls [A] (µg/l)						
Sample Location	**Sample Label**	**Sample Date**	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
GP-34	GP34-GW	5/3/2006	ND (<0.476)	ND (<0.952)	ND (<0.476)	ND (<0.476)	ND (<0.476)	ND (<0.476)	ND (<0.476)
Preliminary Screening Level Values (SLVs)									
MTCA Method A Cleanup Levels for Ground Water [E]			0.1	0.1	0.1	0.1	0.1	0.1	0.1
EPA Region 9 PRG - Tap Water Value [F]			0.96	0.034	0.034	0.034	0.034	0.034	0.034

NOTES:

A - Polychlorinated Biphenyls per EPA Method 8082.

B - Not Detected (ND) at or above the laboratory Method Reporting Limit (MRL) of 37.6 µg/kg (micrograms per kilogram) - dry unit weight basis.

C - Model Toxics Control Act (MTCA) - Cleanup Regulation, Table 740-1, Method A Soil Cleanup Levels for Unrestricted Land Uses.

D - EPA Region 9 Preliminary Remediation Goals (PRGs), October 2004 - residential soil screening value

E - Model Toxics Control Act (MTCA) - Cleanup Regulation, Table 720-1, Method A Cleanup Levels for Ground Water (cleanup levels for drinking water as beneficial use).

F - EPA Region 9 Preliminary Remediation Goals (PRGs), October 2004 - tap water screening value.

TABLE 2 - Soil Analytical Summary Table
TPH
Former Nord Door Facility
Everett, Washington

				Hydrocarbon Identification [A] (mg/kg)			Total Petroleum Hydrocarbons [E] (mg/kg)		
Sample Location	Sample Label	Sample Depth (feet)	Sample Date	TPH Gasoline [B]	TPH Diesel [C]	TPH Heavy Oil [D]	TPH-Gx Gasoline Range	TPH-Dx Diesel Range	TPH-Dx Heavy Oil Range
GP-1	GP1-6	6.0	5/4/2006	ND (<33.2) [F]	ND (<82.9)	DET	-	-	-
GP-1	GP1-10	10.0	5/4/2006	ND (<18.6)	DET	DET	ND (<4.47)	-	-
GP-2	GP2-5	5.0	5/4/2006	ND (<16.8)	ND (<41.9)	ND (<83.8)	-	-	-
GP-3	GP3-9	9.0	5/4/2006	ND (<21.6)	ND (<54.0)	ND (<108)	-	-	-
GP-4	GP4-4.5	4.5	5/11/1006	DET	ND (67.9)	ND (<136)	47.0	-	-
GP-5	GP5-6.5	6.5	5/4/2006	ND (<17.8)	ND (<44.6)	ND (<89.2)	-	-	-
GP-5	GP5-12	12.0	5/4/2006	ND (<18.0)	ND (<44.9)	ND (<89.9)	-	-	-
GP-6	GP6-5	5.0	5/2/2006	ND (<13.6)	ND (<34.1)	ND (<68.2)	-	-	-
GP-7	GP7-5	5.0	5/2/2006	ND (<21.6)	ND (<54.1)	ND (<108)	-	-	-
GP-8	GP8-5	5.0	5/2/2006	ND (<22.2)	ND (<55.4)	ND (<111)	-	-	-
GP-9	GP9-6	6.0	Sample Held	-	-	-	-	-	-
GP-9	GP9-12	12.0	5/1/2006	DET	DET	DET	24.9	1,580	371
GP-10	GP10-3	3.0	5/1/2006	-	-	-	-	440	1,660
GP-10	GP10-11	11.0	5/1/2006	DET	DET	DET	45.3	14,600	3,020
GP-11	GP11-6	6.0	5/4/2006	DET	DET	DET	57.5	60,400	15,700
GP-11	GP11-12	12.0	5/4/2006	DET	DET	DET	11.0	225	47.4
GP-12	GP12-8	8.0	5/2/2006	DET	DET	DET	ND (<4.88)	2,380	801
GP-13	GP13-11.5	11.5	5/1/2006	ND (<21.0)	ND (<52.4)	DET	-	ND (<15.6)	ND (<31.3)
GP-14	GP14-6	6.0	5/1/2006	DET	DET	DET	14.2	1,460	284
GP-15	GP15-10	10.0	5/1/2006	ND (<23.5)	ND (<58.8)	ND (<118)	-	-	-
GP-16	GP16-8	8.0	5/1/2006	ND (<20.9)	ND (<52.3)	ND (<105)	-	-	-
GP-17	GP17-5	5.0	5/1/2006	ND (<20.3)	ND (<50.8)	DET	-	41.0	639
GP-18	GP18-8	8.0	5/1/2006	ND (<24.3)	ND (<60.7)	ND (<121)	-	-	-
GP-19	GP19-10	10.0	5/1/2006	ND (<17.8)	ND (<44.6)	ND (<89.2)	-	-	-
GP-20			Sample Held	-	-	-	-	-	-
GP-21	GP21-5	5.0	5/4/2006	ND (<17.7)	ND (<44.3)	ND (<88.5)	-	-	-
GP-22	GP22-6.5	6.5	5/4/2006	ND (<20.2)	ND (<50.6)	DET	-	ND (<14.7)	37.5
GP-23	GP23-6	6.0	5/1/2006	ND (<17.9)	ND (<44.7)	ND (<89.3)	-	-	-
GP-24	GP24-6	6.0	5/3/2006	ND (<17.2)	ND (<42.9)	DET	-	53.3	471
GP-25			Sample Held	-	-	-	-	-	-
GP-26	GP26-7	7.0	5/3/2006	ND (<21.4)	ND (<53.6)	ND (<107)	-	-	-
GP-27	GP27-2	2.0	5/3/2006	ND (<17.6)	ND (<44.1)	ND (<88.2)	-	-	-
GP-28			Sample Held	-	-	-	-	-	-
GP-29	GP29-8	8.0	5/4/2006	ND (<20.7)	ND (<51.9)	DET	-	ND (<16.2)	75.6
GP-30			Sample Held	-	-	-	-	-	-
GP-31	GP31-6	6.0	5/3/2006	ND (<16.8)	ND (<41.9)	ND (<83.8)	-	-	-
GP-32			Sample Held	-	-	-	-	-	-
GP-33	GP33-7	7.0	5/3/2006	ND (<19.5)	ND (<48.8)	ND (<97.5)	-	-	-
GP-34	GP34-8	8.0	5/3/2006	DET	DET	DET	ND (<4.35)	770	3,400
GP-35	GP35-7	7.0	5/4/2006	ND (<22.3)	ND (<55.6)	ND (<111)	-	-	-
GP-36	GP36-6	6.0	5/3/2006	ND (<19.7)	ND (<49.2)	ND (<98.4)	-	-	-
GP-37	GP37-8	8.0	5/2/2006	ND (<18.5)	ND (<46.3)	DET	-	ND (<15.4)	63.7
GP-38	GP38-8	8.0	5/2/2006	ND (<21.8)	ND (<54.6)	ND (<109)	-	-	-
GP-39	GP39-9	9.0	5/2/2006	ND (<19.0)	ND (<47.6)	DET	-	ND (<69.0)	290
GP-40	GP40-8	8.0	5/2/2006	ND (<17.6)	ND (<44.1)	ND (<88.2)	-	-	-
GP-41	GP41-8	8.0	5/2/2006	ND (<19.3)	ND (<48.3)	DET	-	ND (<28.0)	85.5
GP-42	GP42-8	8.0	5/2/2006	ND (<19.6)	ND (<49.0)	DET	-	ND (<12.9)	70.0
Preliminary Screening Level Values (SLVs)									
MTCA Method A Soil Cleanup Levels for Unrestricted Land Use [G]				NA	NA	NA	100 / 30 [K]	2,000	2,000
MTCA Priority Contaminants of Concern (MTCA Table 749-2) Simplified Terrestrial Ecological Evaluation Procedure [H]				NA	NA	NA	200	460	NP [L]
Oregon DEQ Risk-Based Concentrations Residential Exposure Scenario [I]				NA	NA	NA	720	3,900	9,800
Oregon DEQ Risk-Based Concentrations - Residential Vapor Intrusion into Building Exposure Scenario [J]				NA	NA	NA	140	>S [M]	>S

NOTES:

- = Not Sampled or Not Analyzed for specific constituent.

BOLD = Analytes detected at or above the laboratory method reporting limit.

A - Hydrocarbon Identification per NW-TPH Methodology.

B - Gasoline Range Hydrocarbons

C - Diesel Range Hydrocarbons

D - Heavy Oil Range Hydrocarbons

E - Hydrocarbon per NW-TPH-Gx and NW-TPH-Dx methodologies.

F - Not Detected (ND) at or above the laboratory Method Reporting Limit (MRL) of 33.2 mg/kg (milligrams per kilogram).

G - Model Toxics Control Act (MTCA) - Cleanup Regulation, Table 740-1, Method A Soil Cleanup Levels for Unrestricted Land Uses.

H - Model Toxics Control Act (MTCA) - Priority Contaminants of Ecological Concern for Site that Qualify for the Simplified Terrestrial Ecological Evaluation Process, Table 749-2.

I - Screening value using Oregon's Risk-Based Concentration for Residential exposure to TPH in soil (surface soil value).

J - Screening value using Oregon's Risk-Based Concentration for Residential exposure by vapor intrusion into building from TPH in soil.

K - 100 mg/kg for gasoline mixtures without benzene and the total of ethylbenzene, toluene and xylene are less than 1% of the gasoline mixture, 30 mg/kg for all other gasoline mixtures.

L - Value Not Provided.

M - For this screening value exposure pathway, the groundwater RBC (value) exceeds the solubility limit. Free product would likely be present to exceed the screening value by this pathway.

= Value exceeds one or more of the Screening Level Values

EXHIBIT F

Site Cleanup:

JELD-WEN SITE
(FORMERLY NORD DOOR)

300 West Marine View Drive
Everett, Washington

DRAFT PUBLIC PARTICIPATION PLAN

Prepared by:
Washington State Department of Ecology

WASHINGTON STATE
DEPARTMENT OF
ECOLOGY

October 2007

Ecology Publication #07-09-097

This plan is for you!

This public participation plan is prepared for the JELD-WEN site cleanup as part of the requirement of the Model Toxics Control Act (MTCA). The plan provides information about MTCA cleanup actions and requirements for public involvement, and identifies how Ecology and JELD-WEN will support public involvement throughout the cleanup. The plan is intended to encourage coordinated and effective public involvement tailored to the community's needs at JELD-WEN.

For additional copies of this document, please contact:

Washington State Department of Ecology
Sandra Caldwell, Ecology Project Coordinator
Toxics Cleanup Program
PO Box 47600
Olympia, WA 98504-7600
(360) 407-7209
Email: saca461@ecy.wa.gov

If you need this publication in an alternate format, please call the Toxics Cleanup Program at (360) 407-7170. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call (877) 833-6341 (TTY).

Table of Contents

1.0: Introduction and Overview of the Public Participation Plan

This Public Participation Plan explains how you can become involved in improving the health of your community. It describes public participation opportunities that will be conducted during the cleanup as part of a cooperative agreement between the Washington State Department of Ecology (Ecology) and JELD-WEN, Inc. (JELD-WEN), formerly Nord Door. This agreement, called an Agreed Order, is a legal document in which JELD-WEN and Ecology agree to decide on cleanup actions for the JELD-WEN site, located at 300 West Marine View Drive, in Everett, Washington. These cleanup actions, and the public participation process that helps guide it, are established in Washington's Model Toxics Control Act (MTCA).[1]

Under MTCA, Ecology is responsible for providing timely information and meaningful opportunities for the public to learn about and comment on important cleanup decisions before they are made. The goals of the public participation process are to promote understanding of the cleanup process so that the public has the necessary information to participate, and to encourage involvement through a variety of public participation opportunities.

This Public Participation Plan provides a framework for open dialogue about the cleanup among community members, Ecology, cleanup site owners, and other interested parties. It outlines basic MTCA requirements for community involvement activities that will help ensure that this exchange of information takes place during the investigation and cleanup, which include:

- Notifying the public about available reports and studies about the site;
- Notifying the public about review and comment opportunities during specific phases of the cleanup investigation;
- Providing appropriate public participation opportunities such as fact sheets to learn about cleanup documents, and if community interest exists, holding meetings to solicit input and identify community concerns; and
- Considering public comments received during public comment periods.

In addition to these basic requirements, the plan may include additional site-specific activities to meet the needs of your community. Based upon the type of the proposed cleanup action, the level of public concern, and the risks posed by the site, Ecology may decide that additional public involvement opportunities are appropriate.

[1] The Model Toxics Control Act (MTCA) is the hazardous waste cleanup law for the State of Washington. The full text of the law can be found in Revised Code of Washington (RCW), Chapter 70.105D The legal requirements and criteria for public notice and participation during MTCA cleanup investigations can be found in Washington Administrative Code (WAC), Section 173-340-600.

These opportunities form the basis for the public participation process. The intent of this plan is to provide complete and current information to all interested parties, to let you know when there are opportunities to provide input, to listen to concerns, and to address those concerns.

Part of the Puget Sound Initiative

JELD-WEN is one of a number of sites in the Everett area and is part of a larger cleanup effort, called the Puget Sound Initiative (PSI). Governor Chris Gregoire and the Washington State Legislature authorized the PSI as a regional approach to protect and restore Puget Sound. The PSI includes cleaning up 50-60 contaminated sites within one-half mile of the Sound. These sites are grouped in several bays around the Sound for "baywide" cleanup efforts. As other sites in the Everett baywide area move forward into investigation and cleanup, information about them will be provided to the community as well as to interested people and groups.

Roles and Responsibilities

Ecology will lead public involvement activities, with support from JELD-WEN. Ecology maintains overall responsibility and approval authority for the activities outlined in this plan. Ecology and JELD-WEN are both responsible for cleanup at this site. JELD-WEN will conduct, and Ecology will oversee, all cleanup activities. Ecology will ultimately ensure that contamination on this site is reduced to concentrations that are established in state regulations and that protect human health and the environment, known as cleanup levels.

Organization of this Public Participation Plan

The sections that follow in this plan provide:

- Section 2: Background information about the JELD-WEN site;
- Section 3: An overview of the local community that this plan is intended to engage; and
- Section 4: Detailed public involvement opportunities in this cleanup.

This PPP addresses current conditions at the site, but it is intended to be a dynamic working document that will be reviewed at each phase of the cleanup, and updated as needed. Ecology and JELD-WEN urge the public to become involved in the cleanup process.

2.0: Site Background

Site Description and Location

The JELD-WEN site is located at 300 West Marine View Drive in Everett, Snohomish County, Washington. It is west of the Legion Memorial Golf Course and the American Legion Memorial Park (see Figure 1). The site is rectangular in shape, and approximately 47 acres in size. It is bounded by vacant industrial property (the Baywood property) to the north, Maulsby Mudflats to the south, Burlington Northern Railroad and West Marine View Drive to the east, and Port Gardner Bay to the west. The site is located in the vicinity of where the Snohomish River flows into Port Gardner Bay.

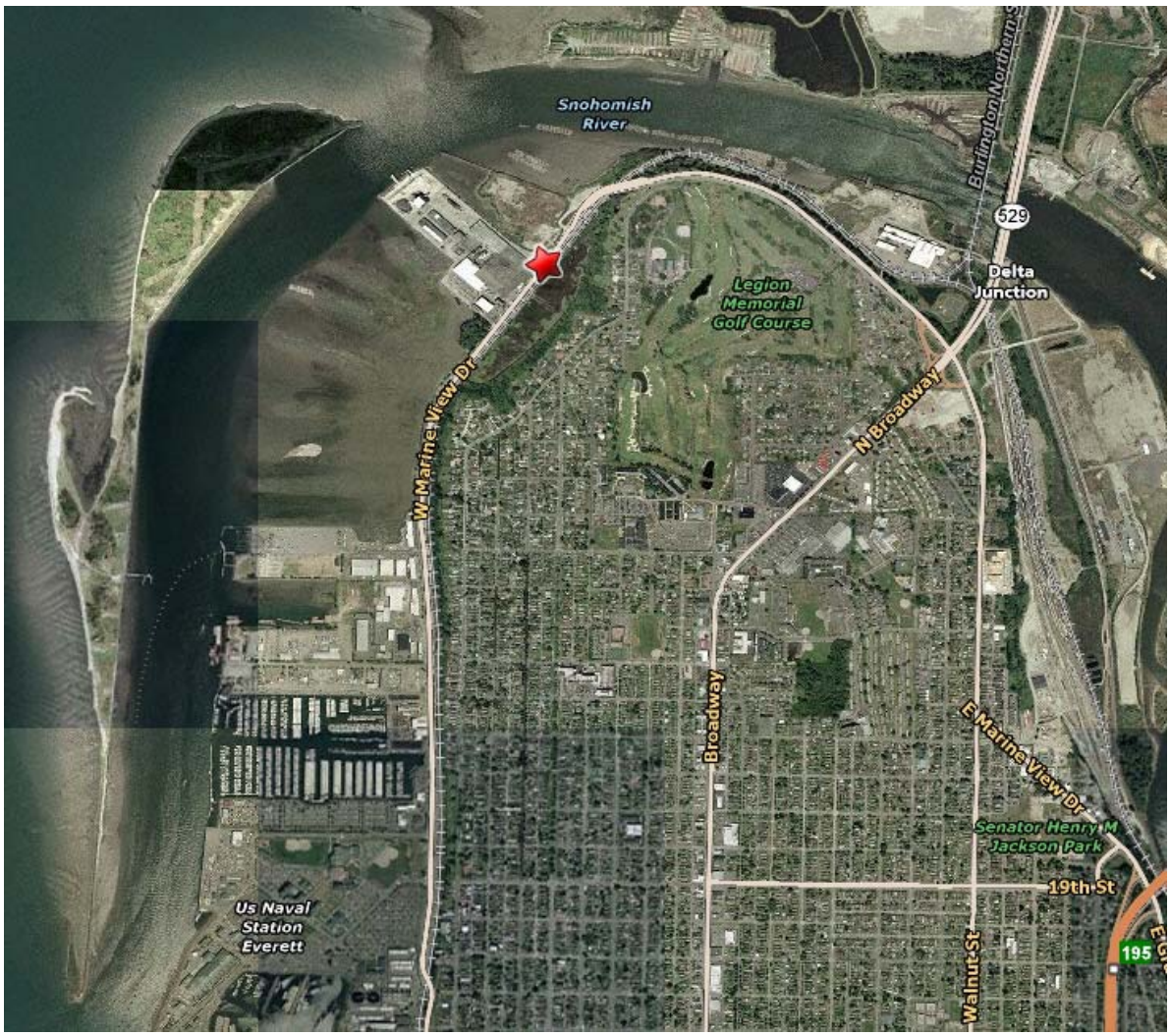


Figure 1: The JELD-WEN site is shown in the above map with a star, located at 300 W. Marine View Drive, in Everett, WA.

The City of Everett Comprehensive Plan land use map[2] indicates that the site is zoned industrial, for maritime services. Zoning to the east includes a small agricultural area, and residential single-family homes. Zoning to the west includes open water and parks (Jetty Island). The site is not located within the Everett Smelter area of historic arsenic contamination.

General Site History and Contaminants

The JELD-WEN site was a wooden door plant (Nord Door) prior to its closure in 2005. The property also had a machine shop, where parts were manufactured. Prior to construction of the wooden door plant, a portion of the property near West Marine View Drive was historically used as a pole treating facility. Chemicals formerly used on the site include petroleum products such as fuel oil, diesel and gasoline, toluene, parts cleaning solvents, thinners, polychlorinated biphenyls (PCBs), glues, and pentachlorophenol (a wood preserving fungicide also known as PCP). Additionally, creosote was used in the pole-treating operation. Contaminants from these activities may be present in site soil and water.

In 2006, JELD-WEN conducted soil and groundwater investigations on the site, and found the following contaminants at concentrations above MTCA cleanup levels:

- Petroleum compounds- in soil and groundwater
- Polynuclear aromatic hydrocarbons (PAHs), also known as creosote – in soil and groundwater
- Toluene - in soil and groundwater, and
- Benzene - in groundwater.

Further investigation will be done to fully characterize the contamination at the JELD-WEN site.

The Cleanup Process

Washington State's cleanup process and key opportunities for you to provide input are outlined in Figure 2. The general cleanup process includes the following steps:

- Remedial investigation (RI) - investigates the site for types, locations, and amounts of contaminants;
- Feasibility study (FS) - identifies cleanup options for those contaminants; and
- Cleanup action plan (CAP) – selects the preferred cleanup option and explains how cleanup will be conducted.

At any time during the cleanup process, an interim action may be conducted. An interim action partially addresses cleanup at the site and is usually followed by site-wide cleanup.

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[2] Planning and Community Development, City of Everett, WA http://www.everettwa.org/Get_PDF.aspx?pdfID=339 (Accessed September 14, 2007)

Each of these steps will be documented in reports and plans that will be available for public review. Public comment periods of at least 30 calendar days are usually conducted for the following documents:

- Draft remedial investigation report;
- Draft feasibility study report; and
- Draft cleanup action plan.

These cleanup steps and documents are described in greater detail in the following subsections.

Interim Actions

Interim actions may be conducted during the cleanup if required by Ecology. An interim action partially addresses the cleanup of a site, and may be required if:

- It is technically necessary to reduce a significant threat to human health or the environment.
- It corrects a problem that may become substantially worse or cost substantially more to fix if delayed.
- It is needed to complete another cleanup activity, such as design of a cleanup plan.

Interim actions are not currently anticipated on the JELD-WEN site.

Remedial Investigation/Feasibility Study Report

JELD-WEN and Ecology have agreed to conduct a remedial investigation (RI) on the site. The RI determines which contaminants are on the site, where they are located, and whether there is a significant threat to human health or the environment. The draft RI report provides baseline data about environmental conditions that will be used to develop cleanup options. The feasibility study (FS) and report then identify and evaluate cleanup options, in preparation for the next step in the process.

The RI and FS processes typically include several phases:

- Scoping;
- Site characterization;
- Development and screening of cleanup alternatives;
- Treatability investigations (if necessary to support decisions); and
- Detailed analysis.

The RI and FS reports are expected to be combined into a draft JELD-WEN RI/FS report. The draft report will be made available for public review and comment. Comments will be considered as the draft cleanup action plan (CAP) is prepared.

Cleanup Action Plan

JELD-WEN and Ecology have agreed to develop a CAP for the site. After public comment on the draft RI/FS report, a preferred cleanup alternative will be selected. The draft CAP explains the cleanup standards that will be applied at the site, selects the preferred cleanup alternative(s), and outlines the work to be performed during the actual site remediation. The CAP may also evaluate the completeness and effectiveness of any interim actions that were performed on the site. The draft CAP will be available for public review and comment. Once public comments are reviewed and any changes are made, Ecology provides final approval and site cleanup can begin.

3.0: Community Profile

Community Profile

Everett is Snohomish County's largest city and the sixth largest city in the State of Washington. The current population of Everett is approximately 98,000 people[3] situated within 47.7 square miles. Located on Port Gardner Bay, Everett hosts the West Coast's second largest marina, U.S. Navy Homeport Naval Station Everett, and The Boeing Company's assembly plant. The city's 2006 labor workforce was more than 80,000, predominantly employed in technology, aerospace, and service-based industries.[4]

Key Community Concerns

An important part of the Public Participation Plan is to identify key community concerns for each cleanup site. The JELD-WEN site is industrial, but located near a residential area. The proximity of the community to the site is likely to raise concerns about how daily life and the future of the community will be affected during and after cleanup of the site.

Many factors may contribute to concerns, such as the amount of contamination, how the contamination will be cleaned up, or future use of the site. Community concerns often change over time, as new information is learned and questions are answered. Identifying site-specific community concerns at each stage of the cleanup process is helpful to ensure that they are adequately addressed. On-going key community concerns will be identified for the JELD-WEN site through public comments and other opportunities as detailed in Section 4.

[3] US Census Bureau, City & Towns Estimates Data for July 1, 2006. http://www.census.gov/popest/estimates.php (Accessed September 12, 2007)
[4] City of Everett. http://www.everettwa.org/default.aspx?ID=314 (Accessed September 12, 2007)

4.0: Public Participation Opportunities

Ecology and JELD-WEN invite you to share your comments and participate in the cleanup in your community. As we work to meet our goals, we will evaluate whether this public participation process is successful. This section describes the public participation opportunities for this site.

Measuring Success

We want this public participation process to succeed in its goals. Success can be measured, at least in part, in the following ways:

- Number of written comments submitted that reflect understanding of the cleanup process and the site;
- Direct "in-person" feedback about the site cleanup or public participation processes, if public meetings are held; and
- Periodic updates to this plan to reflect community concerns and responses.

If we are successful, this process will increase:

- Community awareness about plans for cleanup and opportunities for public involvement;
- Public participation throughout the cleanup; and
- Community understanding regarding how their input will be considered in the decision-making process.

Activities and Information Sources

Ecology Contacts

Ecology is the lead contact for questions about the cleanup in your community. The Ecology staff identified in this section are familiar with the cleanup process and activities at the site. For more information about public involvement or about technical aspects of the cleanup, please contact:

For technical questions or comments:
Isaac Standen
Ecology Project Coordinator
WA State Dept. of Ecology
Toxics Cleanup Program
P.O. Box 47600
Olympia, WA 98504-7600
Phone: (360) 407-6776
E-mail: ista461@ecy.wa.gov

For public involvement questions or comments:
Sandra Caldwell
Ecology Project Coordinator
WA State Dept. of Ecology
Toxics Cleanup Program
P.O. Box 47600
Olympia, WA 98504-7600
Phone: (360) 407-7209
E-mail: saca461@ecy.wa.gov

Ecology's Webpage

Ecology has created a webpage to provide convenient access to information. Documents such as the Agreed Order, draft reports, and cleanup plans, are posted as they are issued during the investigation and cleanup process. Visitors to the webpage can find out about public comment periods and meetings; download, print, and read information; and submit comments via e- mail. The webpage also provides links to detailed information about the MTCA cleanup process. The JELD-WEN site webpage is available at the following address: http://www.ecy.wa.gov/programs/tcp/sites/jeld_wen_everett/jeld_everett_hp.htm

Information Centers/Document Repositories

The most comprehensive source of information about the JELD-WEN site is the information center, or document repository. Two repositories provide access to the complete list of site-related documents. All JELD-WEN investigation and cleanup activity reports will be kept in print at those two locations and will be available for your review. They can be requested on CD as well. Document repositories are updated before public comment periods to include the relevant documents for review. Documents remain at the repositories throughout the investigation and cleanup. For the JELD-WEN site, the document repositories and their hours are:

- **Everett Public Library**
  2702 Hoyt Ave.
  Phone: (425) 257-8010
  Hours: Mon.-Wed. 10 a.m.-9 p.m., Thurs.-Sat. 10 a.m.-6 p.m., Sun. 1-5 p.m.

- **WA Department of Ecology Headquarters**
  300 Desmond Dr.
  Lacey, WA 98504-7600
  By appointment. Please contact Carol Dorn at (360) 407-7224 or cdor461@ecy.wa.gov.

Public Comment Periods

Public comment periods provide opportunities for you to review and comment on major documents, such as the Agreed Order, the draft RI/FS report, and the draft CAP. The typical public comment period is 30 calendar days.

Notice of Public Comment Periods

Notices for each public comment opportunity will be provided by local newspaper and by mail. These notices indicate the timeframe and subject of the comment period, and

explain how you can submit your comments. For the JELD-WEN site, newspaper notices will be posted in The Daily Herald.

Notices are also sent by regular mail to the local community and interested parties. The community typically includes all residential and business addresses within one-quarter mile of the site, as well as potentially interested parties such as public health entities, environmental groups, and business associations.

Fact Sheets

One common format for public comment notification is the fact sheet. Like the newspaper notice, fact sheets explain the timeframe and purpose of the comment period, but also provide background and a summary of the document under review. One fact sheet has been prepared for the JELD-WEN site explaining the Agreed Order and this Public Participation Plan (See Appendix A). Future fact sheets will be prepared at key milestones in the cleanup process.

MTCA Site Register

Ecology produces an electronic newsletter called the MTCA Site Register. This semi-monthly publication provides updates of the cleanup activities occurring throughout the state, including public meeting dates, public comment periods, and cleanup-related reports. Individuals who would like to receive the MTCA Site Register can sign up three ways:

- Call (360) 407-6069
- Send an email request to ltho461@ecy.wa.gov or
- Register on-line at http://www.ecy.wa.gov/programs/tcp/pub_inv/pub_inv2.html

Mailing Lists

Ecology maintains both an e-mail and regular mail distribution list throughout the cleanup process. The list is created from carrier route delineations for addresses within one-quarter mile of the site, potentially interested parties, public meeting sign-in sheets, and requests made in person, or by regular mail or e-email. You may request to be on the mailing list by contacting Ecology's public involvement staff person listed earlier in this section.

Optional Public Meetings

A public meeting will be held during a comment period if requested by ten or more people, or if Ecology decides it would be useful. Public meetings provide additional opportunity to learn about the investigation or cleanup, and to enhance informed

comment. If you are interested in a public meeting about the JELD-WEN site, please contact the Ecology staff listed earlier in this section.

Submitting Comments

You may submit comments by regular mail or e-mail during public comment periods to the Ecology Project Manager and technical staff person listed earlier in this section.

Response to Comments

Ecology will review all comments submitted during public comment periods, and will modify documents as necessary. You will receive notice by regular mail or e-mail that Ecology has received your comments, along with a general explanation about how the comments were addressed, and where the revised document can be found.

Other

Ecology and JELD-WEN are committed to the public participation process and will consider additional means for delivering information and receiving comments.

Notification to Neighborhood Organizations

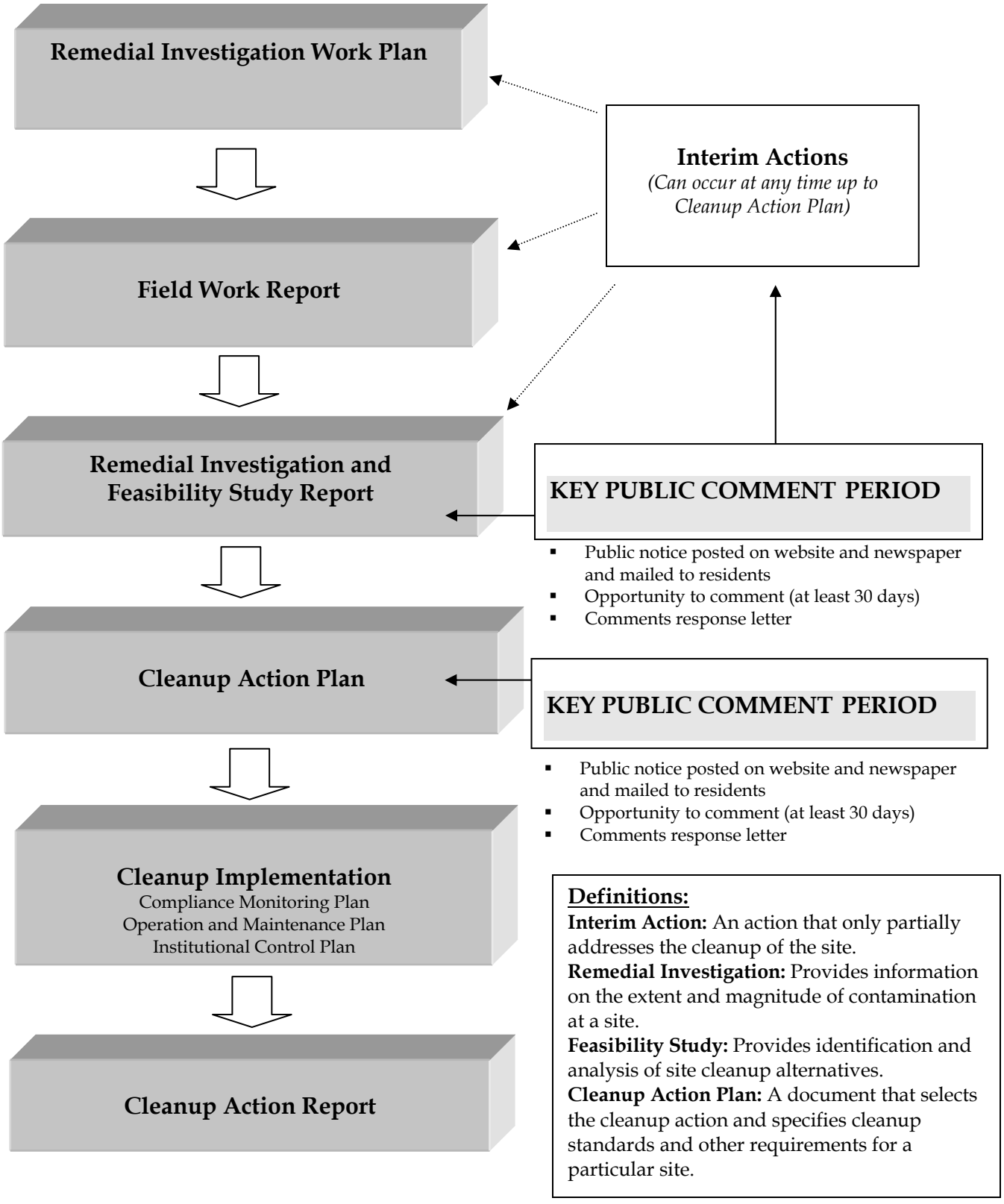
In addition to notification about cleanup activities, special notification to the community is triggered if JELD-WEN chooses to take land use actions. Local neighborhood organizations will be notified by telephone or by e-mail within one week of occurrence or confirmation of the following:

- Notification of the intent to transfer properties;
- Notification of public comment periods for development actions that will trigger State Environmental Policy Act (SEPA) and permitting requirements. All major documents will be submitted to the official document repositories; and
- Notification and stop work for any activities performed on the site that are not allowable under the restrictive covenant for the site.

Public Participation Grants

You are eligible to apply for a Public Participation Grant from Ecology to provide additional public participation activities. Those additional activities will not reduce the scope of the activities defined by this plan. Activities conducted under this plan would coordinate with the additional activities defined under the grant.

Figure 2: Washington State Cleanup Process



Glossary

Cleanup: The implementation of a cleanup action or interim action.

Cleanup Action: Any remedial action except interim actions, taken at a site to eliminate, render less toxic, stabilize, contain, immobilize, isolate, treat, destroy, or remove a hazardous substance that complies with cleanup levels; utilizes permanent solutions to the maximum extent practicable; and includes adequate monitoring to ensure the effectiveness of the cleanup action.

Cleanup Action Plan: A document that selects the cleanup action and specifies cleanup standards and other requirements for a particular site. The cleanup action plan, which follows the remedial investigation/feasibility study report, is subject to a public comment period. After completion of a comment period on the cleanup action plan, Ecology finalizes the cleanup action plan.

Cleanup Level: The concentration (or amount) of a hazardous substance in soil, water, air, or sediment that protects human health and the environment under specified exposure conditions. Cleanup levels are part of a uniform standard established in state regulations, such as MTCA.

Cleanup Process: The process for identifying, investigating, and cleaning up hazardous waste sites.

Contaminant: Any hazardous substance that does not occur naturally or occurs at greater than natural background levels.

Feasibility Study: Provides identification and analysis of site cleanup alternatives and is usually completed within a year. The entire Remedial Investigation/Feasibility Study process takes about two years and is followed by the cleanup action plan. Remedial action evaluating sufficient site information to enable the selection of a cleanup action plan.

Hazardous Site List: A list of ranked sites that require further remedial action. These sites are published in the Site Register.

Interim Action: Any remedial action that partially addresses the cleanup of a site. It is an action that is technically necessary to reduce a threat to human health or the environment by eliminating or substantially reducing one or more pathways for exposure to a hazardous substance at a facility; an action that corrects a problem that may become substantially worse or cost substantially more to address if the action is delayed; an action needed to provide for completion of a site hazard assessment, state remedial investigation/feasibility study, or design of a cleanup action.

Model Toxics Control Act: Refers to RCW 70.105D. Voters approved it in November 1988. The implementing regulation is WAC 173-340 and was amended in 2001.

Public Notice: At a minimum, adequate notice mailed to all persons who have made a timely request of Ecology and to persons residing in the potentially affected vicinity of the proposed action; mailed to appropriate news media; published in the local (city or county) newspaper of largest circulation; and the opportunity for interested persons to comment.

Public Participation Plan: A plan prepared under the authority of WAC 173-340-600 to encourage coordinated and effective public involvement tailored to the public's needs at a particular site.

Release: Any intentional or unintentional entry of any hazardous substance into the environment, including, but not limited to, the abandonment or disposal of containers of hazardous substances.

Remedial Action: Any action to identify, eliminate, or minimize any threat posed by hazardous substances to human health or the environment, including any investigative and monitoring activities of any release or threatened release of a hazardous substance, and any health assessments or health effects studies conducted in order to determine the risk or potential risk to human health.

Remedial Investigation: Any remedial action that provides information on the extent and magnitude of contamination at a site. This usually takes 12 to 18 months and is followed by the feasibility study. The purpose of the Remedial Investigation/Feasibility Study is to collect and develop sufficient site information to enable the selection of a cleanup action.