



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

October 12, 2018

Allan Gebhard
Barr Engineering Company
4300 MarketPointe Drive, Suite 200
Minneapolis, MN 55435

RE: Comments on Revised Final Remedial Investigation Work Plan

- **Site Name:** Boise Cascade Mill
- **Site Address:** 805 North 7th Street, Yakima, WA 98901
- **Facility/Site ID No.:** 450
- **Cleanup Site ID No.:** 12095

Dear Mr. Gebhard:

The Department of Ecology has reviewed the Revised Final Remedial Investigation (RI) Work Plan for the Yakima Mill Site (aka Boise Cascade Mill Site) and has the following comments:

- The word “Site” is used throughout the document when the word “property” is more appropriate. Until the RI process is completed, the project area is designated by parcel boundaries for convenience sake. The word “Site” as defined in the Model Toxics Control Act WAC 173-340-200 is “...any building, structure, etc..... where a hazardous substance ... has come to be located.” Therefore, the exact boundary of the Site will not be known until after the RI process has been completed, and the nature and extent of the environmental impacts are known. Ecology does not expect the authors of this document to change every mention of the word “Site” to reflect its MTCA meaning, however; an acknowledgement of the MTCA definition of the word “Site” and its intended use in the document within *Section 2.0 Site Description* would be appropriate.
- A review of local news reports revealed that there were at least three large fires at the Boise Cascade Mill on September 26, 2009, July 21, 2010, and November 13, 2011. These and any additional fires are not mentioned in this section. Since the chemicals used in firefighting could have a significant environmental impact on the property, Ecology expects a narrative describing these fires to be added to this section before submitting the Final RI Workplan.

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- The detailed schedule for completion of the RI provided in section 8.3 is inconsistent with the language in Agreed Order DE 13959. Ecology expects this entire section be revised to be consistent with Agreed Order DE 13959 before submission of the Final RI Workplan.

Ecology is very impressed with the progress that has been made on the RI Workplan and associated documents, and we look forward to finalizing this document.

Please ensure all comments are appropriately addressed (questions answered, text updated, etc.) with the next submittal, so it can be considered the final.

Please feel free to contact me directly at 509-454-7840 or Mary.Monahan@ecy.wa.gov if you have any questions about the comments.

Sincerely,



Mary Monahan
Project Coordinator
Department of Ecology
Central Regional Office

By certified mail: 7018 0360 0000 1740 9190