



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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December 17, 2018

Shane DeGross  
BNSF Railway Company  
605 Puyallup Avenue  
Tacoma, WA 98421

**Re: Compliance with the Surface Water Cleanup Standards in the Model Toxics Control Act:**

- **Site Name:** BNSF Track Switching Facility aka Wishram Railyard
- **Site Address:** 500 Main St., Wishram, Klickitat County
- **FSID No.:** 1625461
- **CSID No.:** 230
- **Agreed Order:** DE 12897

Dear Shane DeGross:

As stated in Agreed Order No. DE 12897, the Wishram railyard is situated along the shores of the Columbia River in an area, designated as Zone 6, which is a treaty and accustomed fishing area of the Confederated Tribes and Bands of the Yakama Nation. Per WAC 173-173-730, surface water cleanup levels shall be based, in part, on estimates of the highest beneficial use of a surface water body.

The criteria for selection of the Method B cleanup levels for surface water are described in WAC 173-340-730(3). One criterion is the assessment of environmental effects, which can yield applicable contaminant concentrations that are estimated to result in no adverse effects to aquatic life. In 2017, the Department of Ecology (Ecology) performed the testing of petroleum contaminants to establish the environmental effects-based concentrations that are protective of aquatic life in surface waters. Before this study, there were no numeric environmental effects criteria or standards for petroleum hydrocarbon mixtures in the surface waters of Washington State.

The final applicable cleanup standards for surface water compliance that apply to the contaminants of concern at this Site have yet to be established. Thus, Ecology is providing the environmental effects-based concentration obtained from this study as a screening level for the diesel-range Total Petroleum Hydrocarbons in surface water.



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The recommended surface water concentration of diesel that is protective of freshwater aquatic receptors is 150 µg/L. However, due to potential issues with reaching sufficient analytical resolution, the environmental effects-based concentration is revised upwards to a Practical Quantification Limit (PQL) of 250 µg/L.

For the Remedial Investigation report, list the analytical results obtained using NWTPH-Dx in a comparison table that shows the screening levels and cleanup levels for the various exposure pathways.

Sincerely,



John Mefford  
Cleanup Project Manager  
Central Regional Office  
Toxics Cleanup Program

Enclosure: Link to Ecology Publication No. 18-03-002

<https://fortress.wa.gov/ecy/publications/SummaryPages/1803002.html>

cc: Allyson Bazan, AGO Ecology Division  
Brooke Kuhl, BNSF Railway Company  
McClure Tosch, Yakama Nation Fisheries  
Matt Wells, Tupper Mack Wells PLLC