



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 11, 2019

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

RE: Communication on Log Yard Recovery at Boise Cascade Mill Site

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

Dear Allan Gebhard:

Earlier this week, I contacted you by email to ask about activity I observed at the Yakima Mill Site (Site). I noted that there were a number of earth-moving machines working at the Site next to an excavated area, with a number of "hills" of stockpiled material next to the excavated area. The excavation did not appear to be into wood waste, nor did the stockpiled material appear to be wood waste. The excavation instead appeared to be deep into native soil, and the stockpiled material appeared to be dirt.

We are aware that there are on-going, routine operations at the Site involving the recovery and processing of log yard material. To be clear as to the nature of these activities, as well as to be clear that the activities "do not impact known or reasonably anticipated contamination," Fulcrum Environmental Consulting prepared a November 29, 2016 memorandum describing the activities. I have attached the memorandum for your convenience.

According to the memorandum, log yard recovery operations involve "excavation of log yard materials, including mixed rock layers, but are not intended to excavate into native soils." My understanding is that "mixed rock layers" refers to surface rock and gravel that was installed atop native soil at the Site to facilitate historic log yard operations. The memorandum describes that after excavation, log yard materials are to be transported to an on-site separator for processing. The separated materials are then stockpiled according to type: mulch, large wood debris, and cobble-sized rock.

The activity I observed this week is not consistent with this description or process.

That is why I reached out to you. You, in turn, reached out to Ryan Mathews of Fulcrum Environmental Consulting, who reported by email that he visited the Site and spoke with the person leading the log yard material recovery work.

The report Ryan passed along is ambiguous.



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Ryan describes the activity as “simply the continuation of log yard material recovery work in the area north of the railroad tracks” and states that “materials have been recovered to the top of identified native soils.” Without further explanation, however, he indicates that “[t]he current work in this area has extended to the top of the seasonal water table”; that “[p]resently, the area of deepest log yard material recovery is being restored so that none of the areas are below the spring groundwater level”; and that “native gray gravels and cobbles are present” that the operator “plans to spread as an effective weed barrier.”

My concern is that the current activity has exceeded the description of routine log yard recovery operations in the November 29, 2016 memorandum. As a result, I am concerned about the potential for the activity to confound future investigative activities and/or exacerbate contamination at the Site. In addition, an employee of Yakama Nation Fisheries, who is employed by the Tribe to work on cleanup site issues, separately contacted me. In addition to affirming my observation that there has been deep excavation into native soil, the employee voiced concern over the potential for disturbing protected cultural resources.

As you know, Section VIII.K of the parties’ February 17, 2017 Agreed Order provides that in the event Ecology determines that any activity being performed at the Site has the potential to create a danger to human health or the environment on or surrounding the Site, Ecology may direct the PLPs to cease such activities for such period as Ecology deems necessary to abate the danger. I am not exercising this provision at this time; however, I do have a significant concern about what is going on at the Site. I would like to accept Ryan’s January 9, 2019 offer for a Site visit. I am hoping that either Thursday, January 17 or Friday, January 18 will work for all parties to meet at the Site. I will be calling on Monday, January 14 to start setting up the Site visit.

I ask that you and Ryan work with me to arrange this visit. I also ask that until I have had the chance to visit the Site and determine that the activities of concern are not inconsistent with the November 29, 2016 memorandum, the operator cease all material-disturbing activity at the Site, including excavating any material, filling any excavated areas, and in any way moving already-excavated materials.

Thank you for your cooperation in this regard.

Regards,



Mary Monahan
Project Coordinator
Toxics Cleanup Program
Central Regional Office

By certified mail: 7018 0360 0000 1740 8971

Enclosure