

MEMORANDUM

DATE November 29, 2016
TO Mary Monahan, Site Manager, Washington State Department of Ecology
Chris Wend, Site Manager, Washington State Department of Ecology
FROM Ryan K. Mathews, Fulcrum Environmental Consulting, Inc.
RE **Continued Site Operations – Log Yard Material Recovery and Processing**
SUBJECT Yakima Mill Site (Facility/Site ID 450 and Cleanup Site ID 12095)

Thank you for taking the time to review current operations during a site walk of the Yakima Mill Site on October 27, 2016. As you will recall, the intent of the site walk was to provide a review of the current site operations, such that the Washington State Department of Ecology (Ecology) would be informed of the current operations and understand that these activities do not impact known or reasonably anticipated contamination. I hope that the site walk also served to provide a review of general site layout and known/potential areas of environmental concern based on Landau Associates, Inc.'s Phase I Environmental Site Assessment and Phase II Investigation of the Plywood Parcel and the Triangle Parcel and assist in your future review of a planned Remedial Investigation scope of work currently under discussions in a pending Agreed Order for the site.

As you requested, I've prepared this summary of the routine facility operations, including current and planned future log yard material recovery and processing activities at the Yakima Mill Site (also referred to as Boise Cascade Yakima Mill). While planned site activities are not anticipated to impact concerns related to environmental contamination at the properties, we concurred that a summary memorandum reviewing site operations would be beneficial to document site work and as a portion of Ecology's Yakima Mill Site file.

Operation of log decks like those at the Yakima Mill results in the slow accumulation over time of wood chips, bark and gravel, referred to as log yard materials. These materials are routinely managed as part of facility operations. Site operations at typical plywood and lumber mills utilize log yard materials for fuel sources and for sale for use in mulch, landscaping, and other uses. During past operations at the Yakima Mill Site, log yard materials were commonly sold for wood chip and sawdust paper mill feedstock, direct for landscaping, and for incorporation within garden mulch mixes.

Although facility operations at the Yakima Mill began slowing around 2004, recovery of log yard materials has continued. Since about 2004, it is estimated that approximately 550,000 cubic yards of wood mulch materials have been recovered, sold and utilized by others, primarily in landscaping and mulch mixers. Much of the log yard material recovery has focused on near surface accumulations that were present in the log storage decks, including the areas north and south of the rail line that transects the site. Generally, annual mulch production has been between about 25,000 cubic yards and nearly 100,000 cubic yards, depending on product demand.

During routine facility operations, log yard materials are excavated and transported onsite to a separator, where they are processed (screened) under moistened conditions. Generally, log yard materials are segregated into mulch, large wood debris, and cobble-sized rock. Mulch is stockpiled onsite for sale to local and regional mulch processors. Large wood debris is stockpiled and processed into mulch with a wood chipper hog system on an about quarterly basis. Cobble rocks are stockpiled onsite for future reuse, e.g., for redevelopment planning.

As discussed, log yard material recovery operations are planned to continue seasonally as weather permits. The intent is that as preparation of the Remedial Investigation planning documents are completed, coordination between facility operations and the investigation team will ensure that site investigation work can be completed safely while minimizing impacts to log yard material recovery operations.

The next primary area of log yard material recovery is north of the existing rail line, east of the small log mill foot print and west of U.S. Interstate 82. Early estimates place the log yard materials in this area at between 30,000 and 45,000 cubic yards. Site operations will continue with excavation of log yard materials, including mixed rock layers, but are not intended to excavate into native soils. Log yard materials will be transported by dump truck or truck and trailer to the current processing area north of the large log mill foot print for processing. As noted, work will remain 50 to 100 feet away from the former log yard ponds located at the east extent of the former log yards.

If you have any questions or concerns with the continued facility operations related to the recovery of log yard materials, please let me know. Weather permitting, log yard material operations will resume in mid-December.

