

September 20, 2012

Charlie McKinney, Section Manager Department of Ecology, Central Region Office Water Quality Program 15 West Yakima Avenue, Suite 200 Yakima, Washington 98902

Valerie Bound, Section Manager Department of Ecology, Central Region Office Toxics Control Program 15 West Yakima Avenue, Suite 200 Yakima, Washington 98902

RE: Summary of Historic Property Use and Known Environmental Impacts Former Boise Cascade Mill, 805 North 7th Street, Yakima, Washington

Dear Mr. McKinney and Ms. Bound:

On behalf of LeeLynn, Inc., Wiley Mt., Inc. and Yakima Resources, LLC (LeeLynn et al.), Fulcrum Environmental Consulting, Inc. (Fulcrum) has prepared this *Summary of Historic Property Use and Known Environmental Impacts* for the property at 805 North 7th Street in Yakima, Washington. See Attachment A, Figure 1 for a site location map.

The property consists of approximately 211 acres (Property) that was acquired by Cascade Lumber Company in the early 1900s. In the mid to late 1950s, Boise Cascade Corporation (Boise) acquired the Property. Boise operated two sawmills, a plywood mill, and had kiln buildings, a boiler house, large log deck areas, and other support buildings in its lumber manufacturing operations. In early 2004, LeeLynn et al. acquired portions of the Property and leased the remainder from Boise. LeeLynn et al. continued mill operations until 2005-06.

Environmental impacts known to have been present at or to remain at the Property have been investigated and are presented in the reports previously provided to Ecology. Preliminary planning for remediation to be integrated with site redevelopment is underway.

During the past year, Fulcrum and representatives of LeeLynn, Inc. & Wiley Mt., Inc. have worked with Jim Yates, Donna Smith, and Norm Hepner within their respective departments, discussing the ongoing planning for development of the Property. They have been very helpful in assisting us in reviewing Ecology requirements and how Ecology's interests can be efficiently integrated with proposed site redevelopment.

The intent of this letter is to provide a summary of these issues to provide context for discussions related to future investigation, remedial planning, and pending property redevelopment.

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Ownership Summary

LeeLynn, Inc. and Wiley Mt, Inc. own the Property <u>except for</u> approximately 38 acres that contains most of the former City of Yakima municipal landfill (Parcel No. 191318-41001 – the Landfill Parcel). The portion of the Property owned by LeeLynn, Inc. and Wiley Mt, Inc. is referred to below as the LeeLynn/Wiley Mt. Property. Yakima Resources, LLC leases the Landfill Parcel from OfficeMax, successor in interest to Boise Cascade Corporation. See Table 1 for the current ownership of the Property.

The entirety of the Property consists of 20 tax parcels. The tax parcels, current ownership, acreage, and historic uses associated with each parcel are summarized in Table 1.

Tax Parcel Current Owner		Acres ¹	Historic Use & Description	
191318-12001	LeeLynn, Inc. & Wiley Mt., Inc.	± 56	North logyard	
191318-21003	LeeLynn, Inc. & Wiley Mt., Inc.	± 76	North logyard, kiln buildings, and pasture	
191318-23427	LeeLynn, Inc. & Wiley Mt., Inc.	± 1	Gravel covered lot	
191318-23421	LeeLynn, Inc. & Wiley Mt., Inc.	± 0.5	Gravel covered lot	
191318-22411	LeeLynn, Inc. & Wiley Mt., Inc.	± 0.6	Undeveloped parcel	
191318-24001	LeeLynn, Inc. & Wiley Mt., Inc.	± 1.2	Office building and parking	
191318-24402	LeeLynn, Inc. & Wiley Mt., Inc.	± 0.2	Asphalt parking lot	
191318-24419	LeeLynn, Inc. & Wiley Mt., Inc.	± 0.6	Asphalt parking area	
191318-24420	LeeLynn, Inc. & Wiley Mt., Inc.	± 12	Dry storage buildings	
191318-31461	LeeLynn, Inc. & Wiley Mt., Inc.	± 0.4	Undeveloped parcel	
191318-31508	LeeLynn, Inc. & Wiley Mt., Inc.	± 0.2	Undeveloped parcel	
191318-31509	LeeLynn, Inc. & Wiley Mt., Inc.	± 0.2	Undeveloped parcel	
191318-31539	LeeLynn, Inc. & Wiley Mt., Inc.	± 4.0	Autoshop, boiler building, and machine shop	
191318-31453	LeeLynn, Inc. & Wiley Mt., Inc.	± 0.1	Undeveloped parcel	
191318-41001	Office Max Corp. as successor to Boise Cascade Corporation	± 38	South logyard and fueling station (inclusive of most of the Former City of Yakima municipal landfill) (Landfill Parcel)	
191318-42001	LeeLynn, Inc. & Wiley Mt., Inc.	± 12	Plywood facility (includes some areas with municipal solid waste)	
191318-42003	LeeLynn, Inc. & Wiley Mt., Inc.	± 01	Undeveloped parcel	
191318-42401	LeeLynn, Inc. & Wiley Mt., Inc.	± 1.3	Grassy area at entry to Plywood facility	
191318-42404	LeeLynn, Inc. & Wiley Mt., Inc.	± 1.5	Asphalt parking lot	
191318-43539	LeeLynn, Inc. & Wiley Mt., Inc.	± 0.7	Undeveloped parcel	

Table 1: Real Property Summary

1 Provided acreages are approximate

Property History

The Property has been used for lumber manufacturing since the early 1900s. Initially, it was bound on the east by the Yakima River. Historically two large log ponds, as a part of a wet log processing system, were present east of the Property's buildings. By 1964, a state highway, subsequently U.S. Interstate 82, was constructed between the Property and the Yakima River, effectively eliminating surface water log access to the Property. This coincided with a reduction of log pond size and service only to the log mills. Property history indicates that the log pond lying north of the railroad line was filled with imported rock and soil. The log pond lying south of the railroad line was filled with municipal solid waste under operations by the City of Yakima until sometime before 1972. The former City of Yakima municipal landfill covers a large portion of the Landfill Parcel and also encroaches onto the adjacent parcels that LeeLynn, Inc. and Wiley Mt., Inc. now own.



As the mill operated and expanded, the Property reached a stage of full build-out in the 1970s and 1980s. At that time operations included two sawmills, a plywood mill, a planer building, dry storage building, a box building, kiln buildings, boiler house, machine shop, auto shop, logyard shop, two large log decks, and other ancillary buildings.

Historically, the site operated with a U.S. Environmental Protection Agency (EPA) Clean Air Act (CAA) Title V permit, more recently administered by the Yakima Regional Clean Air Agency; a National Pollutant Discharge Elimination System (NPDES) wastewater discharge, including to the site and to the City of Yakima's waste water treatment plant, more recently a state discharge permit, and as a Resource Conservation Recovery Act (RCRA) dangerous waste generator, administered by Ecology.

As site operations have closed, the Title V permit has been withdrawn and the site is now classified as a minor source. Similarly, the site formerly discharged both process wastewater and domestic sewage effluent to the City of Yakima's wastewater treatment plant. With the closure of site operations, the process wastewater discharge permit for the site has been withdrawn and planning is underway for closing out the existing state waste discharge permit and replacement with an administrative agreement to complete groundwater monitoring . Presently only domestic sewage connections are currently utilized at the site. Also, while occasional waste generation occurs, the site is currently classified as a RCRA small quantity generator.

LeeLynn, Inc. and Wiley Mt., Inc. purchased the LeeLynn/Wiley Mt. Property from Boise Cascade Corporation in February 2004. Simultaneously, Yakima Resources, LLC leased the Landfill Parcel from Boise. Yakima Resources continued the mill operations until 2005-2006, when economic conditions compelled closure of the sawmill facilities and the plywood plant. Since 2006, sale, salvage, and demolition of buildings and equipment have occurred in three separate phases.

After acquiring the Property, LeeLynn, Inc. and Wiley Mt., Inc. retained Parametrix to complete a Phase II ESA investigation of the Property. This investigation included separate evaluations of the LeeLynn/Wiley Mt. Property and the Landfill Parcel. Subsequently, the City of Yakima retained SLR International Corp (SLR) to conduct investigations of the former landfill. Our understanding is that reports associated with the investigation of the landfill, including work completed by Parametrix and work completed by SLR, have been or will be provided independently to Ecology and are not discussed further in this letter.

Enclosed with this letter is a report containing environmental sampling data collected throughout the LeeLynn/Wiley Mt. Property. The report was prepared as a portion of site investigation activities provided by Parametrix, Inc. A copy of the *DRAFT Phase II Environmental Site Assessment, Former Boise Cascade Mill Site, December 2008* (2008 Phase II ESA), is enclosed. Also included is a summary report, *Summary of Groundwater Monitoring for Vinyl Chloride, July 2009* (2009 VC Sampling), prepared by Fulcrum. The purpose of the sampling was to evaluate groundwater in select wells for the presence of vinyl chloride that was reported in the 2008 Phase II ESA.

Together, with the reports prepared by SLR and/or others related to the Landfill Parcel, the 2008 Phase II ESA and 2009 VC Sampling, should more fully complete Ecology's files related to the Property.



Investigation Summary Reports

A number of investigation and cleanup activities have been completed at the Property. Based on the information present in Ecology's files, activities include removal of five underground storage tanks, evaluating buried sodium hydroxide, landfarming of petroleum contaminated soils, elimination of unauthorized discharges to the public water treatment system, and general site environmental compliance management. More than 50 items of correspondence, 10 primary reports, and other documents are present in Ecology's files. Some of these reports relate to previous site investigation and remediation completed by Boise Cascade Corporation. A summary of select previous reports from both before and after Boise Cascade's sale and lease of the Property is presented in Table 2 and is designed to provide an overall summary of primary historic concerns:

Report	Author & Date	Summary
Phase One Site	Ecology	In 1987, Ecology completed a review of the Boise Cascade site.
Inspection Report	September 1987	Purpose of the inspection was to evaluate the reported burial of
		9,000 pounds of caustic (sodium hydroxide) materials on the
		Landfill Parcel. Also reported was the burial of 3 cubic yards of
		asbestos waste. Boise completed an inspection that consisted of
		excavation and soil sampling for pH and did not identify elevated
		pH concentrations. Ecology's review identified concerns related
		to the investigation but determined that the risk from buried
		sodium hydroxide was a low priority.
Underground Storage	PLSA Engineering	In 1990, four underground storage tanks were removed from the
Tank Removal	January 3, 1990	site. The tanks include three diesel USTs, ranging in size from
		10,000 to 20,000-gallons and one 10,000-gallon gasoline tank.
		Specific location of the USTs at the property is not provided, but
		was likely located near the former fuel islands. Excavation
		extended to approximately 17-feet in depth and encountered
		groundwater at 15-feet below ground surface. Confirmation
		laboratory analysis found all soil and water samples to be non-
		detect for total petroleum hydrocarbons in the excavation extents.
		Similarly, benzene, toluene, ethylbenzene, and xylenes were all
		non-detect in the samples collected associated with the gasoline
		UST.
Petroleum Testing	PLSA Engineering	The PLSA document reports the identification of approximately
	January 12, 1990	2,000 cubic yards of petroleum contaminated soils associated
		with the underground storage tanks at the site and indicates that
		these soils were associated with the UST removal. Laboratory
		results reported diesel and heavy oil concentrations in excess of
		11,000 mg/Kg. Documentation in Ecology's files does not
		indicate how petroleum contaminated soils were managed.
Underground Storage	Cascade Earth Sciences	In 1993, a 2,000-gallon underground lubricating oil storage tank
Tank Site Assessment	December 1993	was identified during the investigation of an ethylene glycol
		release. The investigation of the ethylene glycol release is
		discussed below. The UST was located south of the small log
		mill, was not in use at the time, and was removed as a part of the
		project. Laboratory analysis did not identify the presence of
		petroleum impact in site soils. Based on the results of the
		investigation, no additional investigation appears to be necessary.

Table 2: Summary of Select Site Reports



Report	Author & Date	Summary	
Independent	Cascade Earth Sciences	In 1993, a release of ethylene glycol was identified associated	
Assessment of Site	January 1994	with a heating system servicing the small log mill. Investigation	
Hazards Associated		did not identify the presence of ethylene glycol in groundwater or	
with Ethylene Glycol		soils above regulatory thresholds. Based on the results of the	
Release		investigation, no additional investigation appears to be necessary.	
Petroleum	Kleinfelder	In 1998, a site soils investigation and soil remediation was	
Contaminated Soil	June 28, 1998	completed for petroleum contaminated soil in the southeast	
Excavation, Plywood		portion of the south logyard (Landfill Parcel). Approximately	
Facility Log Yard		2,750 cubic yards of PCS was identified. The source of petroleum	
		contamination was not provided. Laboratory analysis confirmed	
		the presence of petroleum contamination above Model Toxics	
		Control Act (MTCA) cleanup levels. Kleinfelder recommended	
		onsite bioremediation through landfarming of the contaminated	
		soils. Soils were subsequently landfarmed onsite.	
Soil Sampling of	Fulcrum	In 2002, Fulcrum completed sampling of the reported area of	
Stockpiled Soils	April 12, 2002	landfarmed soils that were identified in Kleinfelder's	
		investigation. The purpose of sampling was to evaluate changes in	
		concentrations of diesel and heavy oil as a result of landfarming	
		activities. Boise subsequently submitted the laboratory results to	
		Ecology and reported that remaining concentrations were below	
		commercial cleanup standards and requested a No Further Action	
		determination. Ecology responded that a NFA could not be issued	
		as Boise had not entered the Voluntary Cleanup Program. Boise	
		reviewed Ecology's comments and concluded that no further	
		remedial actions were necessary.	
Phase II Environmental	Parametrix	In 2007 and 2008, Parametrix completed a Phase II	
Site Assessment,	December 2008	Environmental Site Assessment of the Former Yakima Mill.	
Former Boise Cascade		Purpose of the investigation was to assess the geophysical,	
Mill Site		hydrogeological, subsurface, and surface water at the site for	
		potential environmental impact. The investigation confirmed the	
		presence of iron and manganese in site groundwater, potential for	
		vinyl chloride in site groundwater (MW-07 and MW-08),	
		presence of diesel and motor oil in surface water samples from	
		the northern kiln pond, petroleum hydrocarbons in select portions	
		of the site soils and other localized soils impacts.	
Quarterly Groundwater	Fulcrum	From fall 2008 to spring 2009, Fulcrum completed groundwater	
Monitoring Events	September 18, 2012	monitoring at the Property. During routine quarterly groundwater	
		monitoring, Fulcrum collected additional samples to evaluate the	
		potential for vinyl chloride to be present in MW-07 and MW-08.	
		Laboratory analysis did not identify the presence of vinyl chloride	
		at concentrations above MTCA Method A thresholds during the	
		sampling events.	

Table 2: Summary of Select Site Reports (Continued)

Not discussed above are reports prepared by Parametrix and SLR for the City relating to the landfill and Landfill Parcel, which we understand the City has provided to and is discussing with Ecology. Environmental impacts remaining on the LeeLynn/Wiley Mt. Property consist primarily of areas of discrete petroleum hydrocarbon contamination. These impacts are addressed in the 2008 Phase II ESA prepared by Parametrix. As appropriate, impacts will be further assessed and managed through remedial activities conducted as development proceeds.



To date, several site clearing activities have been completed with the oversight of other agencies, including the Yakima Regional Clean Air Authority and the City of Yakima. Reports associated with site clearing activities have not been submitted to Ecology for tasks such as hazardous building materials inspections, abatement, and demolition as these activities do not typically fall under Ecology reporting requirements at the Property location.

Draft Parametrix 2008 Phase II ESA

The 2008 Phase II ESA investigation identified these primary concerns:

- 1) Groundwater concentrations of iron and manganese above EPA's Secondary Maximum Contaminant Level,
- 2) Reports of diesel and motor oil in surface water associated with a recycled water pond,
- 3) Highly localized areas of contaminated soil, and
- 4) Presence of hazardous building materials requiring management in the event of demolition or renovation (e.g., asbestos containing materials, lead based paint and fluorescent light ballasts).

The 2008 investigation included the two areas that are part of the Landfill Parcel, an approximately 35 acre area located south of the rail line, and an approximately 3 acre area north of the rail line. Aboveground fuel tanks, an autoshop, and the oil house were formerly located on the approximately 3 acre area north of the rail line. See Attachment A, Figure 2 for parcel ownership.

Following is a brief discussion the report findings:

- 1) Elevated iron and manganese in groundwater. Fulcrum has monitoring groundwater conditions as required by the state water discharge permit and pervious NPDES permit since 1998. Initial sampling completed by Landau and Associates in 1997 confirmed the presence of iron and manganese in site groundwater. Currently, the state permit requires quarterly monitoring of groundwater for pH, temperature, iron, manganese, and total dissolved soils. Iron and manganese are present in Property groundwater at concentrations above EPA's Secondary Contaminant levels for drinking water. Specific source(s) of elevated iron and manganese concentrations have not been identified. Since closure of the lumber manufacturing facilities, total water usage at the site has decreased, resulting in an average of approximately a 0.5-foot decline in site groundwater level, with some quarterly measurements representing as much as 3-feet change in groundwater elevation as compared to historic data. Iron, manganese, and total dissolved solids concentrations continue to fluctuate with seasonal changes in groundwater elevations.
- 2) Presence of diesel and motor oil in a recycled water pond. The former recycled water system used gravity flow to collect surface waters in site ponds. The recycled water system consisted of three ponds east of the former north logyard, two ponds west of the former logyard near the kilns, and a connecting ditch system to facilitate flow between ponds. One additional pond was located near the southeast corner of the Property but was used infrequently. The water was then pumped and sprayed on log decks, which was critical in site fire prevention and to retard the growth of fungus. Fulcrum and LeeLynn, Inc. & Wiley Mt., Inc. are not aware of any direct releases of diesel or motor oil into the ponds that have occurred during



LeeLynn, et. al's ownership or operation of the Property. Further, it appears that the selected analytical methodology described in the Phase II report could have affected laboratory results by failing to use silica gel cleanup to remove terpenes, paraffin and other organic materials that would normally be present in water associated with a logyard. Additional investigation and/or remediation of the recycled water pond is an initial site redevelopment task.

3) <u>Highly localized areas of contaminated soil</u>. Fulcrum and LeeLynn, Inc. & Wiley Mt., Inc. are not aware of any underground storage tanks currently remaining on the Property. No aboveground fuel storage tanks remain at the site. The only current petroleum usages on the Property are limited fuel consumption of a few site vehicles and construction equipment (loaders, excavators, etc.).

Localized areas of petroleum hydrocarbons were identified near a former fuel dispenser and south of the former small log mill. These areas each appear to consist of less than 1,000 cubic yards of petroleum contaminated soil and can be effectively managed as a portion of site redevelopment.

Additionally, soil sampling identified localized areas of cadmium, chromium, benzene, naphthalene, and carcinogenic polyaromatic hydrocarbons (cPAHs) at concentrations above MTCA Method A cleanup levels. Review of laboratory analysis does not suggest that any speciation of chromium was completed. While additional investigation of these identified areas is appropriate to delineate the extent of impact, each similarly appears to represent small areas of contamination.

4) <u>Hazardous building materials</u>. Parametrix, Fulcrum, and other consultants have completed inspections for hazardous building materials. Where present, these hazardous building materials have been abated before building demolition. All hazardous building materials accumulated during demolition have been transported by licensed contractors to appropriate landfill facilities for disposal.

Summary of Groundwater Monitoring for Vinyl Chloride

In 2008 and 2009, Fulcrum completed additional analysis for vinyl chloride in three monitoring wells at the Property. Purpose of monitoring was to further evaluate conditions identified during the 2008 Phase II ESA of vinyl chloride in MW-07 and MW-08, and concerns regarding data quality of laboratory analysis of MW-09 samples. Fulcrum completed seven monitoring events, and while vinyl chloride was identified, all concentrations were below MTCA Method A cleanup levels.

Recent Redevelopment Activities

Within the past several years significant redevelopment activities have been completed. Initial activities focused on the closing of mill operations. Manufacturing equipment and other components were sold for reuse, excess metal components were removed for recycling, and timber wood components were reclaimed. Many of the underlying concrete building foundations remain and will likely be crushed for use during redevelopment. Where present, asbestos containing materials, lighting and electrical components, and other potentially hazardous building materials were removed by licensed contractors for offsite disposal at appropriately permitted landfills. Building demolition permits were obtained from the City of Yakima and Yakima Regional Clean Air Authority (YRCAA).



Most recently, contractors have completed asbestos abatement and the majority of demolition of the former plywood facility. Asbestos abatement and demolition of the former boiler house is anticipated to begin in the next several months.

On three primary former logyard decks at the Property, which includes the former northernmost logyard, accumulated bark has been recovered and segregated. Sorting of removed surface bark has been completed to include bark, fines, and rock. Rock is kept onsite for future reuse. A large volume of accumulated surface bark has been removed from the Property for resale. Based on the current sales volume of bark and fines, all accumulated materials should be sold and removed from the site within the next 5 years. Approximately 30% of the total volume of accumulated surface bark cited in the 2008 Phase II ESA remains.

On the south portion of the Property, accumulated bark was removed from the former south logyard, which is located on the Landfill Parcel. Accumulated bark was removed only to the upper most extent of the clay capping layer over the Former City of Yakima Landfill. With the exception of superficial remnant bark, all work has been completed on the former south logyard.

Environmental Investigation and Remediation

Additional investigation and analysis of some property conditions appears to be warranted as part of the ongoing redevelopment planning. At the time of the 2008 Phase II ESA investigation, no evaluation of alternate cleanup levels (MTCA Method B), or of future site use or management, was completed. Additionally, not all analytical methods appear to have been the most appropriate. Taking these efforts to the next level for specific properties as they are proposed for improvement will require close coordination between the property owners (LeeLynn Inc., Wiley Mt., Inc. and OfficeMax), the City of Yakima, and Yakima County. Joint planning for detailed scoping between all parties for this next level of assessment is currently underway with meetings occurring regularly.

Determination of No Human Health or Environment Threat

The current information regarding the contaminants on the LeeLynn/Wiley Mt. Property does not suggest that there is an imminent threat to human health or the environment. Further, maintained site fences inhibit unauthorized access to the site. Finally, the limited current use of the property and deed restriction limiting future uses minimize potential exposure to residual contaminants.

Project Schedule

Work continues to assess the environmental conditions present at the Property associated with historic site operations. LeeLynn, Inc. & Wiley Mt., Inc. are committed to identifying, assessing, and resolving discrete environmental impacts that are located on parts of the LeeLynn/Wiley Mt. Property prior to redevelopment. While LeeLynn, Inc. & Wiley Mt., Inc. do not control the investigation and assessment of the Landfill Parcel, results of their progress have been provided to LeeLynn, Inc. & Wiley Mt., Inc., the City of Yakima, and Yakima County are also working jointly to advance a number of public works projects within the redevelopment area through design and construction work for arterial roads, previously approved I-82 freeway



ramps, and other regional infrastructure needs. See Attachment B for a conceptual site model prepared by Huibregtse Louman Associates, Inc. (HLA) on behalf of the city and county public works design process.

Accordingly, Fulcrum, LeeLynn, Inc. & Wiley Mt., Inc. look forward to working with Ecology as the Property is prepared for redevelopment. As plans for additional investigation are developed, LeeLynn, Inc. & Wiley Mt., Inc., will provide Ecology with appropriate updates on progress. All sites that may require cleanup will likely be managed through Ecology's Voluntary Cleanup Program and LeeLynn, Inc. & Wiley Mt., Inc. will be seeking to achieve maximum coordination between remedial and redevelopment activities as they are collectively scoped.

If you should have any questions, please feel free to contact me at 509.574.0839.

Sincerely, fyar KMather

Ryan K. Mathews, CIH, CHMM Principal

 cc: Jim Yates, Water Quality Program, Ecology – Central Region Office Donna Smith, Water Quality Program, Ecology – Central Region Office Norm Hepner, Toxics Control Program, Ecology – Central Region Office Dennis Radocha, Office Max, Corp. Brad Hill, LeeLynn, Inc. & Wiley Mt., Inc. Larry Gildea, LeeLynn, Inc. & Wiley Mt., Inc. Tony O'Rourke, City Manager, City of Yakima Jeff Cutter, City Attorney, City of Yakima

Attachments:

Figure 1: Site Location Map Figure 2: Parcel Ownership Map Conceptual Site Development Plan

Enclosures:

DRAFT Phase II Environmental Site Assessment, Former Boise Cascade Mill Site, Yakima, Washington, Parametrix, December 2008

Summary of Groundwater Monitoring for Vinyl Chloride, Dunollie Yakima Facility, Fulcrum Environmental Consulting, Inc. September 18, 2012



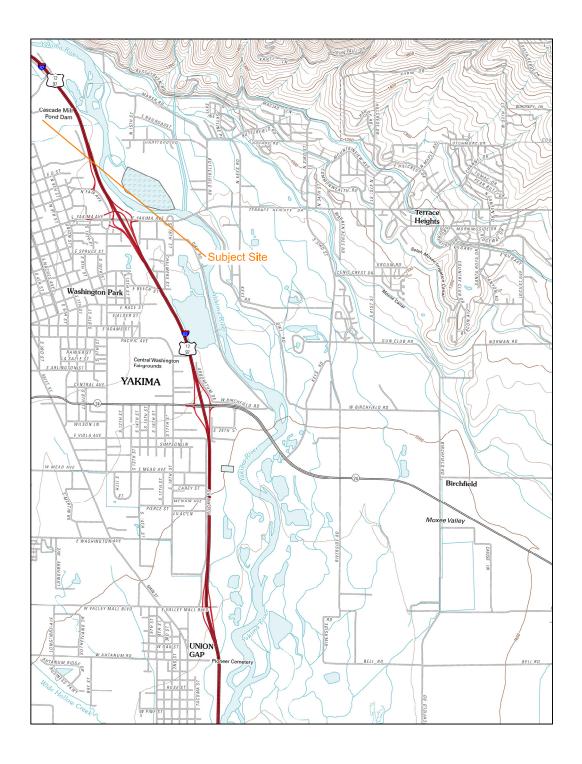
Attachment A

Figures



Historic Site Use and Known Environmental Impacts Former Boise Cascade Mill Site, Yakima, Washington P. 509.574.0839 F. 509.575.8453 406 North 2nd Street Yakima, Washington 98901 *efulcrum.net*



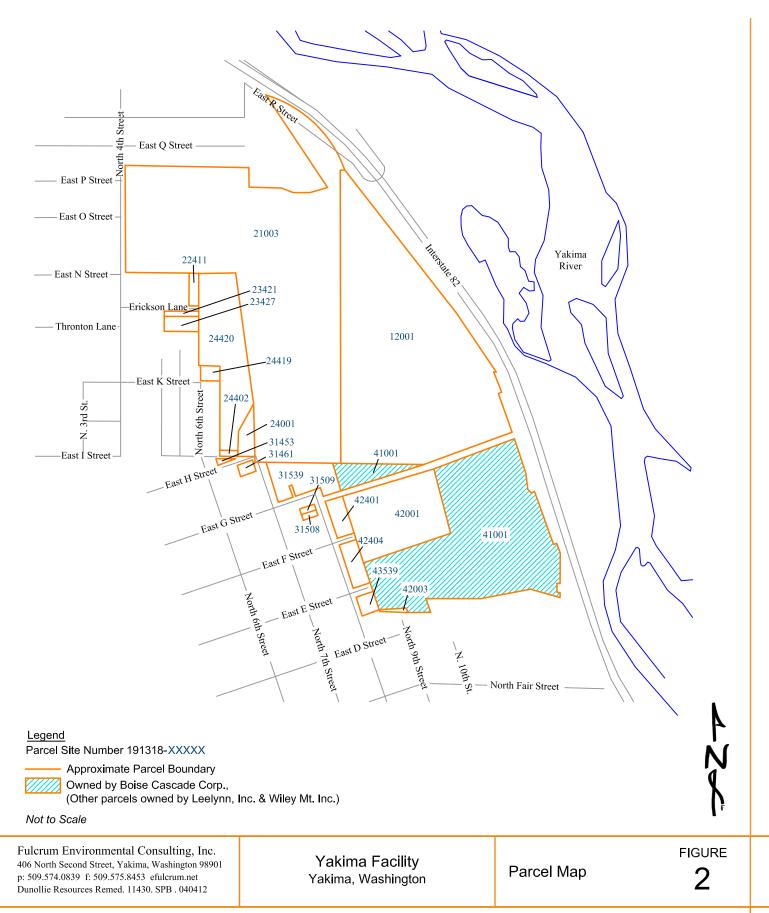


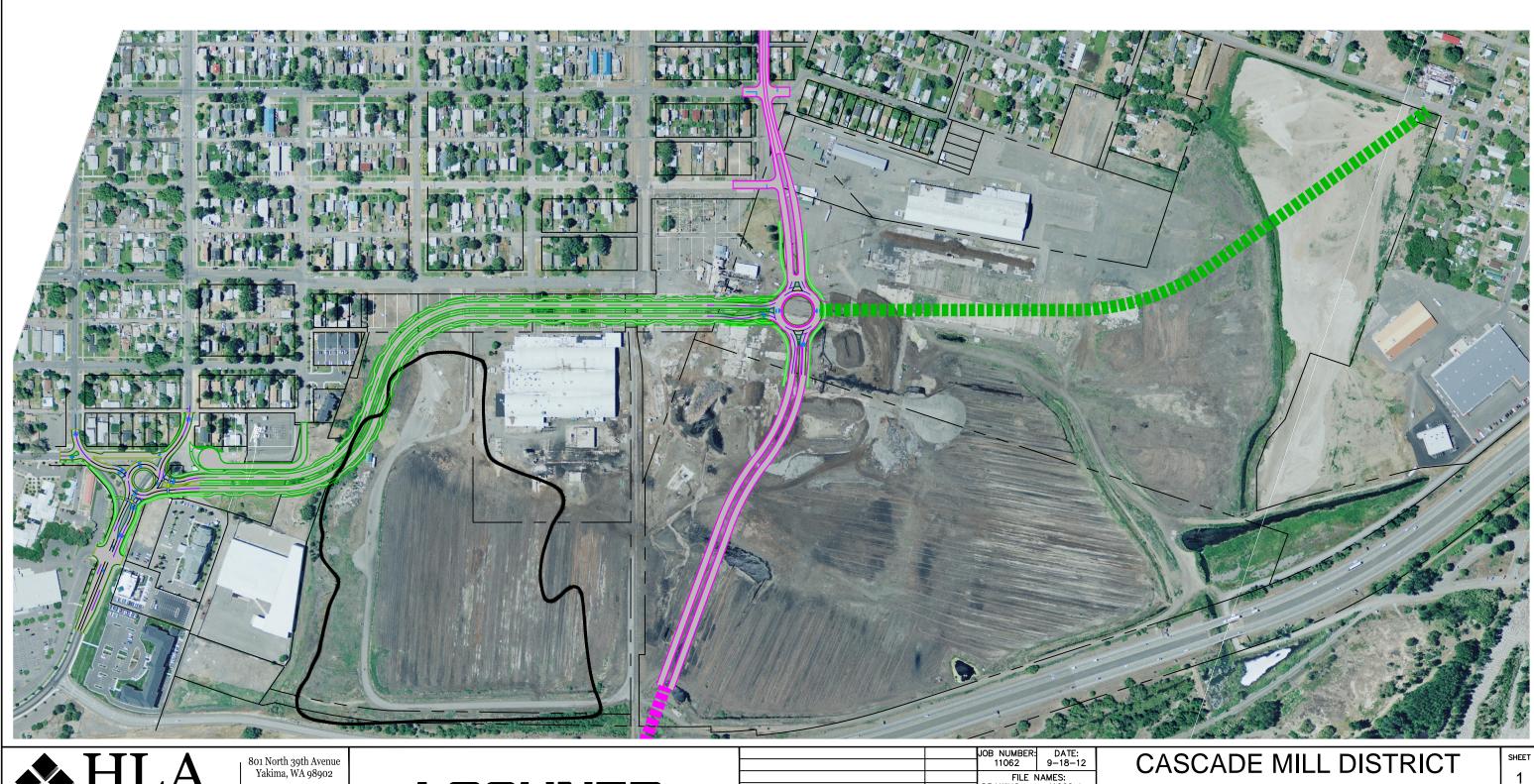
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Yakima Facility Yakima, Washington FIGURE

A No





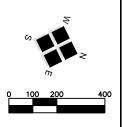




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