



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

August 13, 2020

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

RE: Comments on BNSF's response to Ecology regarding the full investigation of the sediments

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

Dear Shane DeGross:

The Department of Ecology (Ecology) requires BNSF Railway Company (BNSF) to perform an investigation of the sediments per the Sediment Management Standards, Chapter 173-204 WAC (SMS). To date, BNSF has failed to fully investigate and/or characterize past releases to the Columbia River along the entire extent of the property that housed the facility in its historical incarnation over its approximate 100-year span.

Early in the planning process of the sediment investigation, Ecology expressed the requirement to perform a comprehensive investigation and continues to maintain this position. Ecology communicated this requirement in a letter dated October 4, 2017 and by verbal communication from Chance Asher during a meeting at Ecology's Central Regional Office on November 3, 2017. This message was reiterated again in letters dated August 5 and October 5, 2019, respectively.

Ecology understands the distinction between the existing emphasis on the separate phase petroleum hydrocarbon releases in contrast with the larger investigation that must occur. Based on recent data, Ecology has determined this is a sediment site, which moves this work from an Initial Investigation to a Remedial Investigation.

Existing information shows the inundated lands are impacted by a historical release or releases of petroleum hydrocarbons associated with the facility.



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However, BNSF has not fully characterized the nature and extent of sediment contamination adjacent to the entire extent of the facility for contaminants of known concern and of potential concern from multiple potential sources and activities from the railyard operations (e.g., all of the outfalls that have historically discharged to surface water and sediments). Groundwater monitoring data shows that aqueous phase petroleum hydrocarbons currently affect the surface water and very likely sediment adjacent to the facility. Further, secondary contaminants consequent of the degradation of these organics also affect the surface water medium.

Overall, the existing data shows numerous points of non-compliance such that the petroleum hydrocarbon contamination interferes with or degrades the beneficial uses of the water body and exceeds the SMS criteria. This impact of the contamination as revealed through investigation has occurred throughout the history of the facility and actual or potential effects continue to this present day. Impacts by other contaminants of potential concern are likely occurring of which we are ignorant. This data gap can be remedied through the performance of a comprehensive evaluation of the sediments adjacent to the facility in the form of a Remedial Investigation in compliance with the SMS WAC 173-204-550 and the Sediment Cleanup User's Manual, Chapter 3, Publication No. 17-09-052.

Therefore, Ecology has determined this is a sediment site under the SMS and requires that BNSF perform a Remedial Investigation, which will consist of sampling sediment for known and suspected releases from multiple potential sources and activities at the railyard, as provided under WAC 173-204-550. The Remedial Investigation shall include analysis of the full suite of SMS chemicals (SMS Table VI) as well as carcinogenic PAHs, and PCB congeners (reported as sum TEQs; SCUM II, Chapter 6).

Ecology appreciates your attention to this important matter. As always, feel free to contact me at (509) 731-9613 or John.Mefford@ecy.wa.gov.

Sincerely,



John Mefford, LHG
Cleanup Project Manager
Toxics Cleanup Program
Central Regional Office

cc: Chance Asher, Toxics Cleanup Program Sediment Lead, Department of Ecology
Bob Dexter, Environmental Consultant to Yakama Nation
Teresa Michelsen, Avocet Consulting, Environmental Consultant to Yakama Nation
Laura Shira, Environmental Engineer, Yakama Nation Fisheries