



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

September 30, 2020

**Sent via email and hard copy by mail**

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

**RE: Comments on BNSF reply to Ecology directive to Conduct Sediment Remedial Investigation**

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

Dear Shane DeGross:

Thank you for expressing BNSF's commitment to perform a full Remedial Investigation (RI) for the sediment cleanup unit at the BNSF Track Switching Facility (Site) as required under the Model Toxics Control Act (MTCA).

I accept the proposal for BNSF to submit an agency review draft of a Sediment RI Work Plan within 90 days. Regarding the work plan design, the Department of Ecology (Ecology) stands by the comments in our letter dated August 13, 2020 as well as our previous letter dated April 21, 2020. We expect that BNSF will create the RI Work Plan to be consistent with the applicable guidance provided in the Sediment Cleanup User's Manual (SCUM), in reference primarily to Chapters 3, 4 and 5.

As you may be aware, MTCA, Chapter 173-340-130 WAC, obligates Ecology to involve tribal governments in the development and implementation of remedial actions. In particular, we have sought the input of the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) as required under MTCA as well as under an existing Memorandum of Understanding between the State of Washington and the Yakama Nation.



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As I stated in our letter dated April 21, 2020, this Site is located along the shores of the Columbia River within a treaty usual and accustomed fishing area. Ecology will continue to work closely with the Yakama Nation as we evaluate this Site.

Sincerely,



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

cc: Chance Asher, Ecology TCP Sediment Lead  
Allyson Bazan, AGO Ecology Division  
Laura Shira, Yakama Nation Fisheries  
Matthew Wells, Tupper Mack Wells PLLC, Counsel to BNSF