



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

September 2, 2004



Reply To  
Attn Of: ECL-113

Bruce Sheppard  
Manager Environmental Remediation  
The Burlington Northern and  
Santa Fe Railway Company  
2454 Occidental Ave. S., Suite 1A  
Seattle, WA 98134-1451

RE: Notice of Completion of Removal Action, Woods Industries Site, Yakima, Washington,  
Administrative Order on Consent, CERCLA Docket No. 1087-03-18-106

Dear Mr. *Bruce* Sheppard:

The Environmental Protection Agency, Region 10 ("EPA"), has completed its review of your August 10, 2004, letter, which enclosed a recorded restrictive covenant for the Woods Industries Site in Yakima, Washington. We also have again reviewed the December 9, 2003, final groundwater monitoring report. The Woods Site was the object of two actions in 1993 to remove buildings and soil contaminated by substances used in the formulation and distribution of pesticides. The purpose of this letter is to acknowledge completion of those activities pursuant to Section XVII of the Administrative Order on Consent ("AOC") cited above.

In accordance with the AOC, the removal activities at the Site resulted in the excavation and temporary storage of soil and the demolition of buildings and removal of structures and assorted trash and debris. Contaminated soil was thermally treated. The December 2003 groundwater monitoring report reflected monitoring through September 2002. The data indicated that levels of contaminants had dropped to below cleanup levels since the soil cleanup, with two exceptions. Dieldrin and hexachlorobenzene (HB) remain above cleanup levels in one monitoring well. Some pesticide residue also remains on cobbles that were not suitable for washing, which was the treatment used on smaller rocks. These contaminants remaining at the Woods Industries Site are appropriate for the control restrictions typically embodied in Institutional Controls.

The restrictive covenant, which includes a legal description of the property and a topographical map of the property, along with the separate December 2003, final groundwater monitoring report, comprise a description of conditions at the site as they currently exist. EPA agrees with the terms under which a change in site use or documented conditions would require advance notification and approval by EPA and/or the Washington State Department of Ecology.

The primary remaining risk at the Site is levels of the two contaminants in groundwater. The Institutional Controls shall remain in effect until EPA or the State of Washington Department of Ecology determines that the groundwater meets applicable standards for domestic agricultural, commercial, or industrial purposes, and usage for one or more such purposes is consistent with applicable law.

In accordance with Section XVII of the AOC, and except for any continuing obligations as required by this Order and in the restrictive covenant, this will provide notice of completion of work pursuant to the AOC. EPA will be sending BNSF a bill in the near future for oversight costs to date. If you have any questions, please contact Kathleen S. Johnson of my staff at 206-553-8513.

Sincerely,



Cami Grandinetti, Unit Manager  
Site Cleanup Unit 4  
Environmental Cleanup Office

cc: Rick Roeder, Ecology  
Tom Backer, Preston Gates & Ellis