

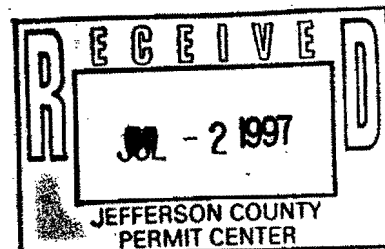


STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

P.O. Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

February 5, 1997

Mr. Richard W. Elliott  
Davis Wright Tremaine LLP  
1800 Bellevue Place  
10500 NE 8th Street  
Bellevue, WA 98004



Dear Mr. Elliott:

Following our discussion of January 31, 1997, the Washington State Department of Ecology (Ecology) is issuing this letter to supersede our January 27, 1997, letter regarding the former Port Ludlow Log Yard property. Ecology appreciates your initiative in pursuing an independent remedial action under the Model Toxics Control Act (MTCA). Ecology's Toxics Cleanup Program has reviewed the following information regarding the former Pope and Talbot Log Yard Facility located at the intersection of Paradise Bay Road and Oak Bay Road, Port Ludlow, Washington 98365:

Environmental Partners, Inc., Draft Phase I Environmental Site Assessment, Port Ludlow Log Dump, Port Ludlow, Washington, June 22, 1995.

Environmental Partners, Inc., Phase II Environmental Site Assessment, Pope Resources, Port Ludlow, Washington, November 28, 1995.

Environmental Partners, Inc., Sediment Sampling and Analysis Plan, Pope Resources, Port Ludlow Log Yard, Pope Ludlow, Jefferson County, Washington, June 10, 1996.

Environmental Partners, Inc., Final Independent Remedial Action Report, Former Port Ludlow Log Yard Facility, Port Ludlow, Washington, October 23, 1996.

Environmental Partners, Inc., correspondence: Port Ludlow Log Yard, Oak Bay and Paradise Bay Roads, Port Ludlow, Jefferson County, Washington, July 12, 1996.

Environmental Partners, Inc., Addendum Information to: Final Independent Remedial Action Report; Former Log Yard Facility, Port Ludlow, Washington, December 12, 1996.

Your reports will be kept in the Central Files of the Southwest Regional Office (SWRO) of Ecology for review by appointment only. Appointments can be made by calling the SWRO resource person, at (360) 407-6365.

High Total Organic Carbon was confirmed in sediments which is indicative of organic loading and suggests that sediments may exceed SMS criteria. For this reason, strict compliance with Sediment Management Standards (SMS) was not ascertainable.

Based on the information reviewed, Ecology has determined that, at this time, the release of petroleum, PCBs, semivolatile organic compounds, and heavy metals in the upland soil, groundwater and adjacent intertidal sediment (identified in the above referenced reports) no longer poses a threat to human health or the environment. For these contaminants and locations Ecology is issuing this determination that no further action is necessary at this site under the Model Toxics Control Act (MTCA), Ch. 70.105D RCW. However, please note that because

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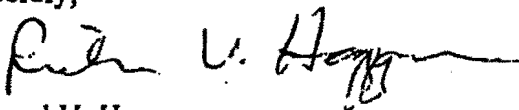
your actions were not conducted under a consent decree with Ecology, this letter is not a settlement by the state under RCW 70.105D.040(4).

This determination is made only with respect to the release identified in the independent remedial action reports dated June 22, 1995, November 28, 1995, June 10, 1996, October 23, 1996, July 12, 1996, and December 12, 1996. This no further action determination applies only to the area of the property affected by the releases identified in the reports at the former Pope and Talbot Log Yard Facility located at the intersection of Paradise Bay Road and Oak Bay Road, Port Ludlow, Washington 98365. It does not apply to any other release or potential release at the property, or any other properties.

Ecology does not assume any liability for any release, threatened release or other conditions at the site, or for any actions taken or omitted by any person or his/her agents or employees with regard to the release, threatened release, or other conditions at the site.

Ecology will update the appropriate site databases to reflect this "No Further Action" determination. Your site will not appear in future publications of Ecology databases. If you have any questions about any of the information presented in this letter, please contact me at (360) 407-6267.

Sincerely,



Richard V. Heggen  
Site Assessor  
Toxics Cleanup Program  
Southwest Regional Office

RVH:jr

cc: John Brasino, Environmental Partners  
Francis Sweeney, Department of Natural Resources, Aquatic Lands Division  
Jefferson County Health District

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