

Appendix K

Letters with Department of Ecology's review and comments to the RI Report



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 18, 2020

Mr. Brian Peters, L.G.
GHD
20818 44th Avenue W, Suite 190
Lynnwood, WA 98036

Re: Fuel Processors Site, Woodland, Washington – Draft Remedial Investigation Report Review
Comments

Dear Mr. Peters:

The Department of Ecology (Ecology) has reviewed the document titled, "Draft Remedial Investigation Report, Fuel Processors Facility." Our review comments are listed on the enclosed document.

Some of our comments address statements in the draft report that are subject to interpretation, opinion, or bias. We ask you to remove these statements to only provide information based on fact. This will not affect compliance of the report to the requirements of WAC 173-340-350 or a future cleanup remedy.

Please email me at chof461@ecy.wa.gov if I can provide additional information or answer any questions.

Sincerely,

A handwritten signature in cursive script that reads "Charles P. Hoffman".

Charles P. Hoffman, P.E.
Environmental Engineer
Hazardous Waste & Toxics Reduction Program
Southwest Regional Office

Enclosure

cc: Bill Briggs, ORRCO
Andrea Wing, Shell Oil
Dave Coles, Coles & Associates
Jill Betz, Coles & Associates

1. Section 2.1. Page 2. First paragraph. "The approximate extent of the former Shell footprint, based on a review of aerial photographs and a 1943 Sanborn fire insurance map, is presented on Figure 2 and Figure 2A." And Section 4.7. Page 17. Second paragraph. "Based on a review of historical records, former Shell operations were limited to the western half of the Property."

Ecology Comment

The demarcated footprint on the figures show Shell Oil's infrastructure. However, Shell Oil owned the entire site and the operator had access to the entire site that is now Fuel Processors. This was previously addressed by Ecology in a letter to Conestoga-Rovers & Associates (now GHD) dated August 9, 2012.

2. Section 2.1. Page 2. First complete paragraph. The last sentence seems incomplete.
3. Section 2.1. Page 2. Second paragraph. "All fueling infrastructure was reportedly removed and/or decommissioned from the Property in 2005 and 2007; however, in 2018 and 2019, GHD observed leaves, debris, and approximately six inches of oily liquid within the H-3 sump, and heavy oil within a stand pipe under the loading rack canopy."

Ecology Comment

Fuel Processors submitted a Closure Report to Ecology on September 12, 2007. According to the report, some of the tanks were cleaned in 2002 and subsequently removed. The remaining tanks were cleaned in February 2007 and then removed from the site. The report states that all used oils, oily solids, and contaminated rinse water were transported to Fuel Processors' Portland facility for treatment and disposal. The closure report also states:

Run-on and run-off protection was the same as when the site is operating. All tank's (sic) interiors were pumped dry of rinse fluid during the rinsing process. Rinse fluid from the decontamination of the exterior surfaces were collected within the sealed and bermed concrete enclosure. The enclosure sump was then pumped free of rinse fluids and decontaminated.

Also, Sump H-3 was cleaned on October 13, 2005 (letter with photographs from ORRCCO to Ecology dated December 13, 2005). The letter also describes the cleaning process used for 6 underground pipes located under the concrete containment area used for product transfer from the tanks to the loading rack. The removed contents, including cleaning fluids, were transported to the Portland facility for processing.

Since Fuel Processors has not processed used oil at the site for about 20 years, it seems likely that the contents in Sump H-3 observed by GHD accumulated over the past 15 years from runoff and/or onsite contamination.

4. Section 2.2. Page 2. First paragraph. "a release of several thousand gallons of used oil was reportedly spilled from a punctured tank or broken pipe in the eastern portion of the former tank farm in March 1985. At the time of this spill, the tank farm was unpaved and a remedial excavation was subsequently completed by Fuel Processors Inc. (FPI) across the tank farm area." And Section 6. Page 18. "Petroleum hydrocarbons were likely released to the subsurface prior to 1985 and during a report spill of several thousand gallons of used oil in March 1985 in the eastern portion of the former tank farm."

Ecology Comment

The following is from the report titled, "Initial Site Investigation: Fuel Processors Inc., Facility, 701 Bozarth Avenue, Woodland, WA" dated December 15, 2011:

During FPI's early renovation of the facility, a pipe from a used-oil tank was broken by an excavator. An oil spill within the bermed area was created by this accident. The released oil was cleaned up immediately with a vacuum truck. Because the bermed area between the tanks consisted of gravel over soil, FPI excavated visually-contaminated gravel and soil from the tank secondary containment structure. The concrete was placed so that its surface sloped toward sumps in order to contain rain water, meet the requirements of the SPCC, and more recently meet the requirements of 40 CFR 270 (Federal Used-Oil Regulations).

In a letter dated August 9, 2012, from Ecology to Conestoga-Rovers & Associates, Ecology discussed this spill with the following:

FPI excavated between 1 to 2 feet of soil as a result of the used oil spill that occurred in the spring of 1985 when FPI was preparing the site for their use. The oil was immediately pumped out and about a foot of impacted soil was removed, and the concrete floor to the containment area was then constructed. There was little or no chance for percolation of oil through the soil.

The RI needs to include additional information regarding the 1985 spill and Fuel Processors response.

5. Section 2.2. Page 2. Second Paragraph. "In October 1985, an additional remedial excavation was completed in the western portion of the former tank farm."

Ecology Comment

Based on information in a RCRA reconnaissance inspection report dated April 2, 1986, and recollection by Fuel Processor's consultant, the excavation of soil in October 1985 occurred north of the fence line, not within the tank farm.

6. Section 2.6. Page 5. According to a discussion of the property history by Coles & Associates, the 1963 aerial photograph showed a new structure west of the filling structure and a new tank within the tank farm.
7. Section 2.6. Page 6. According to Ecology's information, Fuel Processors ceased processing used oil at the site in 1992. Fuel Processors used the facility from 1992 until 2003 as a transportation and storage facility for used oil.
8. Section 2.6. Page 6. Bullet heading "1985-2002." "Based on a review of historical records, products that were reportedly received at the facility included PCB-contaminated transformer oil and waste oil, spent Tarr solvent, and waste oil that was processed at the facility contained up to six percent benzene."

Ecology Comment

Fuel Processors had interim status for State Dangerous Waste W001, less than 50 parts per million (ppm) PCB contaminated oil. However, the records are not clear if Fuel Processors received shipments of PCB contaminated oil at the Woodland facility. (A review of a manifest in 1991 determined that a shipment of PCB contaminated oil went to Fuel Processor's Portland facility.) The

tank identified for storing PCB contaminated oil was used for diesel fuel storage and later sampling. did not detect PCBs.

Please provide a description of spent Tarr solvent and cite the reference.

Please cite the reference for the statement "waste oil that was processed at the facility contained up to six percent benzene."

9. Section 2.6. Page 6. Bullet heading "1985-2002." Additionally, one drum was observed leaking and labeled "waste gasoline" during a site inspection conducted by Ecology and the EPA (Ecology Inspection Report, September 12, 1991.)"

Ecology Comment

The referenced leaking drum was an 85-gallon overpack drum that was observed by an Ecology inspector on August 28, 1991, through a fence because the facility was closed at the time. The location of this drum was on the north side of the site, near the fence and east of the entrance gate. The Ecology inspector returned to Fuel Processors on September 5, 1991, accompanied by an EPA employee.

A letter from Ecology to Fuel Processors, dated October 8, 1992, states the drums of "waste gasoline" were stored on a concrete pad and that the "concrete beneath this drum was dark and freshly stained." Investigation into the source and contents of the drum indicated that it was sludge from underground storage tank removal on Fort Lewis.

The August 10, 2012, letter from Ecology to Conestoga-Rovers & Associates addresses the drums of "waste gasoline":

CRA asserts that gasoline contamination at the site was the result of leaking "waste gasoline" drums. However, FPI provided clarification regarding the "waste gasoline" drums in response to the August and September 1991 Ecology's Inspection Report. Mr. Briggs was present when EPA and Ecology inspected the facility on September 5, 1991. Mr. Briggs noted that the drums near the northern fence line including the "waste gasoline" drums contained oil sludge and tanks bottoms from UST removal at Fort Lewis. They had loose bungs (plugs were not tightened down) and some rainwater that created sheen on the top of the drums. Any gasoline that might have drained down the side of the drums was minor and could not account for all the gasoline found in the soil and groundwater. The drums were only present at the site for a short period (days) and they were set on concrete. Gasoline does not stain concrete to the extent observed in the area of the drum which was more consistent with used oil staining. TEL and MMT found at the site were consistent with chemical additives found in pre-1986 gasoline. The "waste gasoline" drums were not a source for extensive gasoline contamination found in the soil and groundwater at the site.

10. Section 2.6. Page 6. Bullet heading "1985-2002." Include in the chronology that Fuel Processors ceased processing used oil at the site in 1992 and used the site for storage and as a transfer facility from 1992 to 2003 (March 18, 2005, letter from Fuel Processors to Ecology).
11. Section 4.1.2.3. Page 11. "GHD also noted apparent oil-impacted soil beneath the elevated warehouse floor, where the flooring had been removed east of the former AST location. Since this impacted soil was unknown prior to these field activities, samples were not collected."

Ecology Comment

The oil impacted soil beneath the warehouse floor was known prior to GHD conducting monitoring or well installation at Fuel Processors. Coles & Associates conducted soil sampling at locations HP-6 and HP-7 in 2008 and HP-13 in 2015. Table 1 of the draft RI lists the laboratory test results.

12. Section 4.1. The draft RI has summaries of the sampling, well installation, and soil probes conducted by GHD in 2016, 2016, and 2019. Coles and Associates began the site investigation in 2009 and proceeded with installation of additional monitoring wells and soil probes and sampling through 2015. The draft RI has summaries of Coles and Associates work in Appendix B. However, the descriptions of this work need to be included in the main body of the RI and should not be relegated to an appendix.
13. Section 4.3.1. Page 16. The topic and discussion of “Fuel Fingerprint Analysis” is subject to interpretation and bias to who was or was not responsible for the site contamination. The purpose of the RI is to collect data necessary to adequately characterize the site for the purpose of developing and evaluating cleanup action alternatives (WAC 173-340-350(7)(a)). The discussion in Section 4.3.1. may be useful for private discussion between Shell Oil and Fuel Processors. Please delete Section 4.3.1. from the RI report.
14. Section 4.7. Page 17. Fifth Paragraph. “The 2019 finger printing results performed by Pace indicates that the sample contained a predominately lighter distillate petroleum product that may be somewhat “fresher.””

Ecology Comment

Delete “that may be somewhat “fresher.”” That part of the statement could be a respected opinion but it could be challenged and refuted by another party’s expert.

15. Section 4.7. Page 17. Fifth Paragraph. “This product did have a detection of tetramethyl lead; however, Pace states that assuming a moderate subsurface weathering regime on-Site, it is plausible that the petroleum have experienced a residence time in the environment of 0-8 years.”

Ecology Comment

Delete “however, Pace states that assuming a moderate subsurface weathering regime on-Site, it is plausible that the petroleum have experienced a residence time in the environment of 0-8 years.”

16. Section 4.7. Page 18. Paragraph at Top of Page. This paragraph discusses contamination identified inside and outside of Shell Oil’s “footprint.” The “footprint refers to the location of the infrastructure when Shell Oil owned and operated the site. However, as previously discussed in Comment No. 1, Shell Oil owned and had access to the entire site.
17. Section 5. Second Paragraph. “In October 1985, an additional remedial excavation was completed in the western portion of the former tank farm. Approximately 10 cubic yards of soil was removed.”

Ecology Comment

See response to Comment No. 5.

18. Section 5. Last Paragraph. “In early 2016, Coles performed a vacuum truck total fluids recovery event to remove the measured SPH from MW-10. According to the bill of lading, 46 gallons of fuel were removed and disposed at ORRCO’s Portland, Oregon facility.”

Ecology Comment

Even though the bill of lading may have stated 46 gallons of fuel, that statement requires additional explanation. The contents of MW-10 were removed by vacuum truck on March 10, 2016. The well had approximately 5 feet of floating product that day. The well diameter is 2 inches which results in an initial removal of 0.82 gallon of floating product, not accounting for any petroleum product mixed within the groundwater or recharged while the well contents were removed. "46 gallons of fuel" gives an impression of non-diluted petroleum product.

19. Provide a figure of the site showing the boundaries of the groundwater concentrations as MTCA Method A groundwater cleanup levels for TPHg, TPHd, TPHo, and benzene. These lines could be shown on one figure if possible. Groundwater contamination is discussed in the text of the report but a figure would provide the public with a visual tool to understand the extent of contaminated groundwater.



August 10, 2020

Reference No. 060866

Department of Ecology - TCP
Attn: Charles Hoffman
P.O. Box 47600
Olympia, WA 98604-7600

Dear Mr. Hoffman:

**Re: Response to Comments – Draft Remedial Investigation Report
Fuel Processors – 701 Bozarth Avenue, Woodland, Washington (AO 5054)**

GHD Services Inc. (GHD) has prepared this letter on behalf of Equilon Enterprises LLC dba Shell Oil Products US (Shell) to respond to the Washington State Department of Ecology (Ecology) letter dated May 18, 2020 commenting on GHD's *Draft Remedial Investigation Report* (RI Report) dated January 21, 2020 for the property located at 701 Bozarth Avenue, Woodland, Washington (Property). Ecology has suggested that some of the statements in the draft RI Report are subject to interpretation, opinion, or bias. GHD and Shell believe the report summarizes historical information, communications, investigations, and observations factually and to the best of our understanding.

Based on our review of Ecology's letter, responses to comments are provided below. Additionally, after reviewing the Agreed Order and First Amendment of Agreed Order, No. 5054, Section VII, Work to be Performed, some of the required remedial actions (i.e., Progress Reports) and Exhibit C Schedule of Deliverables should be re-visited.

Ecology Comment #1: Section 2.1. Page 2. First paragraph. "The approximate extent of the former Shell footprint, based on a review of aerial photographs and a 1943 Sanborn fire insurance map, is presented on Figure 2 and Figure 2A." And Section 4.7. Page 17. Second paragraph. "Based on a review of historical records, former Shell operations were limited to the western half of the Property."

Ecology Comment

The demarcated footprint on the figures show Shell Oil's infrastructure. However, Shell Oil owned the entire site and the operator had access to the entire site that is now Fuel Processors. This was previously addressed by Ecology in a letter to Conestoga-Rovers & Associates (now GHD) dated August 9, 2012.

GHD Response: Based on the information that we have for the property, Shell operated a fuel terminal that had a footprint that was reported in the RI Report. We do not have information that identifies Shell or other parties having access to the remaining portion of the Property. We identified Shell as owning the Property previously, and we will change Section 4.7, Page 17, second paragraph to read "Based on a review of historical records, former Shell terminal infrastructure was limited to the western half of the Property".



Ecology Comment #2: Section 2.1. Page 2. First complete paragraph. The last sentence seems incomplete.

GHD Response: This sentence fragment will be deleted.

Ecology Comment #3: Section 2.1. Page 2. Second paragraph. "All fueling infrastructure was reportedly removed and/or decommissioned from the Property in 2005 and 2007; however, in 2018 and 2019, GHD observed leaves, debris, and approximately six inches of oily liquid within the H-3 sump, and heavy oil within a stand pipe under the loading rack canopy."

Ecology Comment

Fuel Processors submitted a Closure Report to Ecology on September 12, 2007. According to the report, some of the tanks were cleaned in 2002 and subsequently removed. The remaining tanks were cleaned in February 2007 and then removed from the site. The report states that all used oils, oily solids, and contaminated rinse water were transported to Fuel Processors' Portland facility for treatment and disposal. The closure report also states:

"Run-on and run-off protection was the same as when the site is operating. All tank's (sic) interiors were pumped dry of rinse fluid during the rinsing process. Rinse fluid from the decontamination of the exterior surfaces were collected within the sealed and bermed concrete enclosure. The enclosure sump was then pumped free of rinse fluids and decontaminated."

Also, Sump H-3 was cleaned on October 13, 2005 (letter with photographs from ORRCO to Ecology dated December 13, 2005). The letter also describes the cleaning process used for 6 underground pipes located under the concrete containment area used for product transfer from the tanks to the loading rack. The removed contents, including cleaning fluids, were transported to the Portland facility for processing.

Since Fuel Processors has not processed used oil at the site for about 20 years, it seems likely that the contents in Sump H-3 observed by GHD accumulated over the past 15 years from runoff and/or onsite contamination.

GHD Response: Section 2.1, Page 2, second paragraph of the RI Report is factual. This information was reported in Fuel Processors' Closure Report and observed in the field by GHD staff and, at least in part, by Fuel Processors representatives. No modifications to the RI Report are proposed.

Ecology Comment #4: Section 2.2. Page 2. First paragraph. "a release of several thousand gallons of used oil was reportedly spilled from a punctured tank or broken pipe in the eastern portion of the former tank farm in March 1985. At the time of this spill, the tank farm was unpaved and a remedial excavation was subsequently completed by Fuel Processors Inc. (FPI) across the tank farm area." And Section 6. Page 18. "Petroleum hydrocarbons were likely released to the subsurface prior to 1985 and during a report spill of several thousand gallons of used oil in March 1985 in the eastern portion of the former tank farm."



Ecology Comment

The following is from the report titled, "Initial Site Investigation: Fuel Processors Inc., Facility, 701 Bozarth Avenue, Woodland, WA" dated December 15, 2011:

"During FPI's early renovation of the facility, a pipe from a used-oil tank was broken by an excavator. An oil spill within the bermed area was created by this accident. The released oil was cleaned up immediately with a vacuum truck. Because the bermed area between the tanks consisted of gravel over soil, FPI excavated visually-contaminated gravel and soil from the tank secondary containment structure. The concrete was placed so that its surface sloped toward sumps in order to contain rain water, meet the requirements of the SPCC, and more recently meet the requirements of 40 CFR 270 (Federal Used-Oil Regulations)."

In a letter dated August 9, 2012, from Ecology to Conestoga-Rovers & Associates, Ecology discussed this spill with the following:

"FPI excavated between 1 to 2 feet of soil as a result of the used oil spill that occurred in the spring of 1985 when FPI was preparing the site for their use. The oil was immediately pumped out and about a foot of impacted soil was removed, and the concrete floor to the containment area was then constructed. There was little or no chance for percolation of oil through the soil."

The RI needs to include additional information regarding the 1985 spill and Fuel Processors response.

GHD Response: The information presented in the RI Report is factual, additional information is also provided in Appendix B – Summary of Previous Investigations. Since there was no confirmation sampling or reporting of excavation activities that occurred in 1985, there is no evidence to corroborate that all of the petroleum hydrocarbon impacted soil was removed. No modifications to the RI Report are proposed.

Ecology Comment #5: *Section 2.2. Page 2. Second Paragraph. "In October 1985, an additional remedial excavation was completed in the western portion of the former tank farm."*

Ecology Comment

Based on information in a RCRA reconnaissance inspection report dated April 2, 1986, and recollection by Fuel Processor's consultant, the excavation of soil in October 1985 occurred north of the fence line, not within the tank farm.

GHD Response: There is a memorandum detailing the April 2, 1986 sampling performed by the EPA. There is no mention of the October 1985 excavation. The memorandum did indicate that the area in the northwest corner of the bermed area is now "paved". Attached is an October 1985 sampling plan indicating that the remaining uncovered portion of the bermed area, the northwestern portion of the concrete bermed area, is planned to be excavated to a depth of 2 to 4 feet below ground surface.



Because the results of the subsequent EPA sampling in April 1986 indicated that soil impacts still remain at the surface, it is unclear if this additional excavation was completed before paving this area.

The report will be changed to say, "In October 1985, an additional remedial excavation was "reportedly" completed in the western portion of the former tank farm (Patrick H. Wicks, Sampling and Analysis Plan, October 1985)."

Ecology Comment #6: *Section 2.6. Page 5. According to a discussion of the property history by Coles & Associates, the 1963 aerial photograph showed a new structure west of the filling structure and a new tank within the tank farm.*

GHD Response: Due to poor photograph quality, it is difficult to ascertain whether there is a new structure west of the filling structure and new tank within the tank farm. Additionally, a new tank was not identified in the 1969 Bill of Sale from Shell to the Deans. No modifications to the RI Report are proposed.

Ecology Comment #7: *Section 2.6. Page 6. According to Ecology's information, Fuel Processors ceased processing used oil at the site in 1992. Fuel Processors used the facility from 1992 until 2003 as a transportation and storage facility for used oil.*

GHD Response: The text will be modified to indicate the 1992 date.

Ecology Comment #8: *Section 2.6. Page 6. Bullet heading "1985-2002." "Based on a review of historical records, products that were reportedly received at the facility included PCB-contaminated transformer oil and waste oil, spent Tarr solvent, and waste oil that was processed at the facility contained up to six percent benzene."*

Ecology Comment

Fuel Processors had interim status for State Dangerous Waste W001, less than 50 parts per million (ppm) PCB contaminated oil. However, the records are not clear if Fuel Processors received shipments of PCB contaminated oil at the Woodland facility. (A review of a manifest in 1991 determined that a shipment of PCB contaminated oil went to Fuel Processor's Portland facility.) The tank identified for storing PCB contaminated oil was used for diesel fuel storage and later sampling did not detect PCBs.

Please provide a description of spent Tarr solvent and cite the reference.

Please cite the reference for the statement "waste oil that was processed at the facility contained up to six percent benzene."

GHD Response: The Ecology Inspection Report dated September 12, 1991 reported that "PCB-contaminated oil were received at Fuel Processors". This is what was indicated in the RI Report. Additionally, PCBs have been detected in soil and groundwater beneath the site.

The reference to the spent Tarr solvents is contained in the attached internal Ecology, February 3, 1999 memorandum from Jerry French to Lisa Rozmyn. This memorandum will be added in the Reference section of the RI Report.



Page 6 paragraph 4 of the Ecology Inspection Report dated September 12, 1991 – “Mr. Briggs told the inspection team that the waste oil this plant has been processing contains up to six percent (6%) benzene.”

Ecology Comment #9: *Section 2.6. Page 6. Bullet heading “1985-2002.” Additionally, one drum was observed leaking and labeled “waste gasoline” during a site inspection conducted by Ecology and the EPA (Ecology Inspection Report, September 12, 1991.)”*

Ecology Comment

The referenced leaking drum was an 85-gallon overpack drum that was observed by an Ecology inspector on August 28, 1991, through a fence because the facility was closed at the time. The location of this drum was on the north side of the site, near the fence and east of the entrance gate. The Ecology inspector returned to Fuel Processors on September 5, 1991, accompanied by an EPA employee.

A letter from Ecology to Fuel Processors, dated October 8, 1992, states the drums of “waste gasoline” were stored on a concrete pad and that the “concrete beneath this drum was dark and freshly stained.” Investigation into the source and contents of the drum indicated that it was sludge from underground storage tank removal on Fort Lewis.

The August 10, 2012, letter from Ecology to Conestoga-Rovers & Associates addresses the drums of “waste gasoline”:

“CRA asserts that gasoline contamination at the site was the result of leaking “waste gasoline” drums. However, FPI provided clarification regarding the “waste gasoline” drums in response to the August and September 1991 Ecology’s Inspection Report. Mr. Briggs was present when EPA and Ecology inspected the facility on September 5, 1991. Mr. Briggs noted that the drums near the northern fence line including the “waste gasoline” drums contained oil sludge and tanks bottoms from UST removal at Fort Lewis. They had loose bungs (plugs were not tightened down) and some rainwater that created sheen on the top of the drums. Any gasoline that might have drained down the side of the drums was minor and could not account for all the gasoline found in the soil and groundwater. The drums were only present at the site for a short period (days) and they were set on concrete. Gasoline does not stain concrete to the extent observed in the area of the drum which was more consistent with used oil staining. TEL and MMT found at the site were consistent with chemical additives found in pre-1986 gasoline. The “waste gasoline” drums were not a source for extensive gasoline contamination found in the soil and groundwater at the site.”

GHD Response: The statement in the RI report is factual and a reference cited. Ecology’s added clarification appears to be speculative and cannot be verified in any of the documents reviewed. No modifications to the RI Report are proposed.

Ecology Comment #10: *Section 2.6. Page 6. Bullet heading “1985-2002.” Include in the chronology that Fuel Processors ceased processing used oil at the site in 1992 and used the site for storage and as a transfer facility from 1992 to 2003 (March 18, 2005, letter from Fuel Processors to Ecology).*

GHD Response: This is the same comment as #7.



Ecology Comment #11: Section 4.1.2.3. Page 11. "GHD also noted apparent oil-impacted soil beneath the elevated warehouse floor, where the flooring had been removed east of the former AST location. Since this impacted soil was unknown prior to these field activities, samples were not collected."

Ecology Comment

The oil impacted soil beneath the warehouse floor was known prior to GHD conducting monitoring or well installation at Fuel Processors. Coles & Associates conducted soil sampling at locations HP-6 and HP-7 in 2008 and HP-13 in 2015. Table 1 of the draft RI lists the laboratory test results.

GHD Response: GHD requested permission, which FPI approved, to sample beneath the elevated warehouse floor where GHD had previously identified oil impacted soil. GHD arrived on site to sample and the area was secured with multiple layers of plywood. Upon removing the plywood, the entire exposed area was filled with debris rendering the area completely inaccessible for sampling. There was no explanation provided as to why access was not made available to us.

It's GHD's technical opinion that borings HP-6, HP-7, and HP-13, do not adequately assess the nature or extent of this heavily oil-impacted soil which also contains elevated concentrations of PCBs, carcinogenic PAHs, and lead. Further waste characterization is necessary to identify appropriate disposal or other treatment options prior to implementing site cleanup. The RI Report will be modified as follows: "GHD also noted apparent oil-impacted soil beneath the elevated warehouse floor, where the flooring had been removed east of the former AST location. A representative of Coles would not allow GHD to sample the oil-impacted soil because this task was not included in the approved Work Plan. During February 2019, FPI and Coles approved a subsequent sampling attempt, however, the area was not accessible for sampling when GHD arrived on site. Historically, samples collected from borings HP-6, HP-7, and HP-13 were collected from this area, however, these borings do not adequately characterize the extent of impacts."

Ecology Comment #12: Section 4.1. The draft RI has summaries of the sampling, well installation, and soil probes conducted by GHD in 2016, 2016, and 2019. Coles and Associates began the site investigation in 2009 and proceeded with installation of additional monitoring wells and soil probes and sampling through 2015. The draft RI has summaries of Coles and Associates work in Appendix B. However, the descriptions of this work need to be included in the main body of the RI and should not be relegated to an appendix.

GHD Response: The data collected by GHD had not previously been provided to Ecology in a report. The data Coles collected was presented in previous reports provided to Ecology. The draft RI Report provides prior investigation data in figures and tables and is presented in the discussion of contaminant occurrence in the main body of the report. The history of prior investigations is also summarized in Appendix B and is appropriate for this type of report. No modifications to the RI Report are proposed.

Ecology Comment #13: Page 16. The topic and discussion of "Fuel Fingerprint Analysis" is subject to interpretation and bias to who was or was not responsible for the site contamination. The purpose of the RI is to collect data necessary to adequately characterize the site for the purpose of developing and



evaluating cleanup action alternatives (WAC 173-340-350(7)(a)). The discussion in Section 4.3.1. may be useful for private discussion between Shell Oil and Fuel Processors. Please delete Section 4.3.1. from the RI report.

GHD Response: As part of developing the RI's Conceptual Site Model, it is necessary to understand the type of contaminants present, as well as when they were released to the environment. The operational history of this site lends itself to a number of potential sources of contamination and adequately understanding the type of separate phase hydrocarbons present in the subsurface is important. Furthermore, during an on-site meeting between Ecology and GHD, Ecology indicated that an independent third party laboratory should perform the fuel fingerprinting, therefore, the 2019 sample was analyzed by Pace Energy Services. No modifications to the RI report are proposed.

Ecology Comment #14: *Section 4.7. Page 17. Fifth Paragraph. "The 2019 finger printing results performed by Pace indicates that the sample contained a predominately lighter distillate petroleum product that may be somewhat "fresher.""*

Ecology Comment

Delete "that may be somewhat "fresher"." That part of the statement could be a respected opinion but it could be challenged and refuted by another party's expert.

GHD Response: This is the interpretation of a third party subject matter expert from a respected laboratory. No modifications to the RI report are proposed.

Ecology Comment #15: *Section 4.7. Page 17. Fifth Paragraph. "This product did have a detection of tetramethyl lead; however, Pace states that assuming a moderate subsurface weathering regime on-Site, it is plausible that the petroleum have experienced a residence time in the environment of 0-8 years."*

Ecology Comment

Delete "however, Pace states that assuming a moderate subsurface weathering regime on-Site, it is plausible that the petroleum have experienced a residence time in the environment of 0-8 years."

GHD Response: This is the interpretation of a third party subject matter expert from a respected laboratory. No modifications to the RI report are proposed.

Ecology Comment #16: *Section 4.7. Page 18. Paragraph at Top of Page. This paragraph discusses contamination identified inside and outside of Shell Oil's "footprint." The "footprint refers to the location of the infrastructure when Shell Oil owned and operated the site. However, as previously discussed in Comment No. 1, Shell Oil owned and had access to the entire site.*

GHD Response: We will modify text to include "terminal infrastructure footprint".

Ecology Comment #17: *Section 5. Second Paragraph. "In October 1985, an additional remedial excavation was completed in the western portion of the former tank farm. Approximately 10 cubic yards of soil was removed."*



Ecology Comment

See response to Comment No. 5.

GHD Response: See GHD's response to Comment No. 5. We will add "reportedly" prior to "completed" in the first sentence above.

Ecology Comment #18: Section 5. Last Paragraph. "In early 2016, Coles performed a vacuum truck total fluids recovery event to remove the measured SPH from MW-10. According to the bill of lading, 46 gallons of fuel were removed and disposed at ORRCO's Portland, Oregon facility."

Ecology Comment

Even through the bill of lading may have stated 46 gallons of fuel, that statement requires additional explanation. The contents of MW-10 were removed by vacuum truck on March 10, 2016. The well had approximately 5 feet of floating product that day. The well diameter is 2 inches which results in an initial removal of 0.82 gallon of floating product, not accounting for any petroleum product mixed within the groundwater or recharged while the well contents were removed. "46 gallons of fuel" gives an impression of non-diluted petroleum product.

GHD Response: GHD reported what was indicated on the bill of lading. No field data sheets were provided describing the event, and therefore, there is no indication as to the depth to groundwater or SPH, SPH thickness, the amount of water that was removed along with the product, the extraction event time, extraction flow rate, the recharge rate, and recoverability of the product. The RI Report will be modified as follows: "Due to incomplete information at the time of the extraction event, the concentration of petroleum in the extracted fluids is unknown."

Ecology Comment #19: Provide a figure of the site showing the boundaries of the groundwater concentrations as MTCA Method A groundwater cleanup levels for TPHg, TPHd, TPHo, and benzene. These lines could be shown on one figure if possible. Groundwater contamination is discussed in the text of the report but a figure would provide the public with a visual tool to understand the extent of contaminated groundwater.

GHD Response: A figure will be included showing the extent of petroleum COPCs in groundwater beneath the Site.



If you have any questions, please contact Brian Peters with GHD at (425) 563-6506.

Sincerely,

GHD

A handwritten signature in black ink that reads 'Brian Peters' in a cursive style.

Brian Peters, LG

BP/cd/2

Encl.

Attachment A Ecology Memorandum dated February 3, 1999

Attachment B Sampling and Analysis Plan dated October 1985

cc: Andrea Wing, Shell
Jeff Bullen, Shell
Aselda Thompson, Shell

Attachment A
Ecology Memorandum dated February 3, 1999

MEMORANDUM

RECEIVED

Date: February 3, 1999
Subject: EnviroSAFE Northwest
524 132nd Street, Suite 104
Everett, WA 98208

To: Lisa Rozmyn

'99 FEB 16 AM 11:20

From: Jerry French *JF*

DEPARTMENT OF ENVIRONMENT & SPACE
S.W. REGIONAL OFFICE

I am writing this memo to document information that I gathered from Dave Clark on January 27, 1999 during a site visit concerning the transport and waste management activities performed by EnviroSAFE Northwest (EN) and ORRCO. I had previously visited EN in November/1998 as part of the Transporter Project during which time Dave Clark expressed no concerns with working with ORRCO. On January 26, 1999 Scott Lamb called and asked that I call Dave Clark because Dave had some concerns about the transportation and management of spent solvents handled by EN. I had plans to be in King County the next day so I called Dave and told him I would meet him then.

I understand that you are site manager for ORRCO in Woodland. I hope that the information provided in this memo will help you in any follow up actions with ORRCO. Pictures and other items are attached.

I met Dave Clark in his Everett office where he told me the following:

- ◆ Dave Clark, former owner of EN and Bill Briggs, owner of ORRCO, went into partnership with each other in the spring of 1998. Dave and Bill were joint partners, 50/50, of EN. Dave said he was not aware of any previous formal enforcement actions against ORRCO or Briggs at the time of the merger.
- ◆ Dave had dissolved his partnership with Briggs just days prior to my visit on 1/27/99. Dave had recently found out about Briggs' prior record of non-compliance with hazardous waste regulations in Oregon. Dave expressed dissatisfaction with the way Briggs or ORRCO accepted and handled waste solvents and used oil with no sampling, testing or analysis being performed on a generators waste.
- ◆ John Briggs is the current part owner of EN. John Briggs and Bill Briggs are not related according to Dave Clark. John and Bill are apparently joint partners, 50/50, of EN. John Briggs spends more time working out of the ORRCO Portland Office than the EN Everett facility. Cam Bell is the driver who picks up waste streams from EN customers and transports it to the EN transfer facility in Everett. John Briggs was not present during this site visit.
- ◆ ORRCO markets a solvent product that is manufactured by Tarr out of Oregon. The phone numbers for Tarr is 503-288-5294 or 1-800-422-5069. A Tarr manufacturerers label on one

of the drums read "Solvent 140F Petroleum distillates". ORRCO transports this solvent product to EN in Everett. EN then markets the Tarr solvent product to its customers as a parts washer and picks up the spent Tarr solvent. Review of a logbook revealed that EN currently has 25 different customers that it provides parts washer solvent service too with most of them in the Kitsap County area. Business clients noted were Kitsap Transit and U-Haul in Olympia.

- ◆ EN was storing 6x30 gallon sized drums of spent Tarr solvent at its transfer facility. A label on one of the drums read "NON-REGULATED WASTE, Bremerton Tire & Auto, 2647 Perry Ave., Bremerton, WA 98310, 10/14/98, Contents: Spent 140°F solvent, Combustible liquid, mineral spirits, oil, grease".
- ◆ EN and ORRCO use a NON-HAZARDOUS WASTE MANIFEST as a shipping paper for the spent Tarr solvent. Its shipping description on the manifest is "Used oil, > 140°, Going for recycle". A copy of a manifest and profile for such a shipment from Drive Train Distributors out of Fife is attached.
- ◆ Some of the spent Tarr solvent is transported to ORRCO in Woodland and some of it is transported to ORRCO in Portland. John Briggs transports the spent Tarr solvent in a 22 foot long box truck from EN in Everett to either of the ORRCO facilities. The spent Tarr solvent is blended in with used oil.
- ◆ EN also picks up used antifreeze, used oil, used absorbents and used gasoline. The used gasoline is blended into used oil at ORRCO.] *
- ◆ John Briggs of EN had pumped out a tank of used oil that was hot into 7 drums located at Integrity Auto Service on Newport Way in Issaquah @ January 20, 1999. Dave Clark had previously had this same batch of oil tested in July, 1998 when he partly owned EN and found it to be hot and having halogens > 2000 PPM. Dave Clark would not accept it as used oil, and told Integrity Auto at that time that it needed further testing. Integrity Auto did not want to pay so it stayed at Integrity Auto until @1/20/99 when John Briggs pumped it out into 7 drums. John was going to transport it to ORRCO as used oil, as is and untested, until Dave Clark intervened. Samples were sent to Sol Pro where it will probably end up going for treatment. Dave Clark dissolved the business partnership with Bill Briggs shortly after this incident. The 7 drums were located in the EN facility during this visit. Dave Clark took a sample of the hot oil to have it tested for his own knowledge and to cover himself.
- ◆ Dave Clark's biggest concern is that proper procedures are not being followed to ensure that the spent Tarr solvent, used oil and spent gasoline meets the specifications of a non-hazardous waste fuel or used oil. He questions whether metals and other constituents are present prior to introduction to the furnace. With no profiles, lab testing and no hazardous waste manifests being completed Dave Clark says he wonders how legitimate ORRCO is.]

- ◆ When Dave Clark was part owner of EN he had devised his own profile forms, lab testing data forms and customer checklists to assure that waste streams were either hazardous or non-hazardous. Attached are profile sheets that Dave Clark had completed for spent Tarr solvent that he handled when he partly owned EN. Dave Clark's profile sheet shows the spent Tarr solvent to designate while the profile sheet completed by John Briggs and ORRCO for waste generated by Drive Train Distributors shows that it does not designate.
- ◆ Dave Clark had spent much time and effort to designate the spent Tarr solvent while John Briggs and Bill Briggs did not use these types of forms or waste sample testing. Dave Clark said he did not want to be put in the position where he may have to face a formal enforcement action because of Brigg's disregard to environmental statutes.

I want to point out a discrepancy found on paperwork gathered during this site visit. Look at the transporter ID# on the attached NON-HAZARDOUS WASTE MANIFEST. You will see that the ID# is WAD980978142. If you go into HWIMSY you find that this ID# is the same as Reflex Recycling Corp. in Tacoma. You will also see the Reflex ID# on a Chemical Sample Profile Sheet for Pacific Resource Recovery (Attached). Dave Clark had made arrangements for transport of hazardous waste fuels to Pacific Resource Recovery. It is apparent that EN used Reflex as a transporter for certain shipments. So the question: Why is EN using the Reflex ID# on a NON HAZARDOUS WASTE MANIFEST when EN is actually transporting the spent Tarr solvent and using an EN truck? You would think that EN should of used their own ID# on the NON HAZARDOUS WASTE MANIFEST. The EN ID# is WAH000006122. More on this later.

Dave Clark also informed me of his relationship with Reflex Recycling Corp. during the summer of 1998 and here is that story:

- ◆ Last summer John Briggs, Bill Briggs (ORRCO), EN (Dave Clark), and Jerry Moran ^{Reflex} planned to form an agreement to work together and use the Reflex recycling stills for reclaiming spent solvents, to use the Reflex pit for accumulating oil/water waste, to use the Reflex facility for temporary storage of oil filters, absorbents and antifreeze, and to use Reflex as a transporter. John Briggs, ORRCO and EN planned to collect various waste streams from their customers and then have it transported to Reflex for treatment or storage.
- ◆ The four parties mentioned above had actually arranged for and had different waste streams transported to Reflex for a short time period. Shortly after waste was being transported to Reflex, the 3 owners of the Reflex property dissolved their working relationship. The business plan put together by the four parties described above also dissolved at the same time. What little waste was transported to and stored at Reflex was transported down to ORRCO. Jerry Moran, part owner of Reflex, works out of an office space at the EN facility in Everett as an independent waste broker.

What kind of wastes?

- ◆ Reflex employed a driver named Cam Bell. Cam Bell is apparently employed by ORRCO but drives primarily for EN. Cam receives all direction from John Briggs and does what he is told to do.

From all this information it appears that Cam Bell is a driver who transports waste materials for Reflex and EN and quite possibly for ORRCO also. Cam Bell may have mistakenly placed the Reflex ID# on the NON HAZARDOUS WASTE MANIFEST. Only additional follow up investigation would provide the answers needed on the ID# discrepancy.

During my visit I advised Dave Clark to contact Sheri Dotson so he could complete a Form 2 to have his name removed as the EN contact and owner since he had dissolved his business relationship with Bill Briggs and with EN. Dave Clark now operates Environmental Technology Services (ETS) and works as a waste broker and also provides bioremediation technology services for cleanup of PCS and other organics. ETS is located in the same building as EN and has the same address. ETS does not operate a transfer facility, they only set up waste disposal services through other companies. EN uses a garage for temporary storage of drums of waste while ETS works out of an office. Dave Clark's phone number is (425) 741-8639.

Upon review of all of this information there are compliance items that need follow up which are as follows:

- ◆ Full designation of spent Tarr solvent, used absorbents, used oils, used gasoline and other waste streams at the point of generation. ORRCO and EN are telling their customers that these waste streams are non-hazardous and picking it up with no prior testing or designation.
- ◆ If the above waste streams designate as dangerous waste then all of EN's customers could be in non-compliance with generator requirements.
- ◆ If the spent Tarr solvent material designates then is the ORRCO Woodland facility permitted to accept it? If it does not designate is it still permitted to accept it?
- ◆ Oregon DEQ needs to know about this as these waste materials may affect the permit conditions of the ORRCO receiving facility in Portland.
- ◆ Transporter ID#'s need to be corrected. The interrelationship between EN, ORRCO and Reflex needs to be understood. A driver employed by one transporter company with its specific ID# but who also drives and transports for another transporter company with its ID# is okay as far as Dangerous Waste Regulations are concerned. However, we must also understand that the generator always designates the transporter and must know who is handling their waste. If there are any problems with transport then the transporter is required under WAC 173-303-250 to contact the generator to receive further instructions.

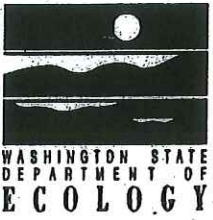
This is another case where a transporter takes custody of a generator's waste, and then does not inform the generator who is transporting it and where it's at, which is not acceptable.

- ◆ Please read WAC 173-303-950(3). If any of this material designates as dangerous waste then I believe that this rule could be applied against EN and ORRCO for falsely representing information on a manifest, profile or any other record that is used for the purpose of compliance. The generator is totally reliant on EN and ORRCO to designate their waste streams and to also complete the paperwork. I have used this section against a transporter/broker here in ERO who represented that a waste material was non hazardous on a standard shipping paper when in fact it was hazardous waste and a uniform hazardous waste manifest should have been completed. I issued an enforcement letter against the transporter for violation of 950(3) and also issued an enforcement letter against the generator for failure to comply with generator requirements. Both parties had sufficient information to ensure compliance so they were both out of compliance, the generator more so than the transporter. WAC 173-303-950(3) may very well be the means for us to require a transporter or consultant or waste broker to be held accountable for their actions. There is other enforcement cases on record where the transporter/broker were found in non-compliance for falsely representing information on a manifest, label or other documents used for the purpose of compliance with hazardous waste regulations. Some people may disagree with me on this but I would like your opinion.
- ◆ If any of the waste streams that are handled by EN, or John Briggs or ORRCO also designate as a hazardous waste, and is also transported across state lines from Washington to Oregon by the same persons, then a criminal investigation is warranted.

But it's the generator's resp. to describe their wastes

I hope this information helps you during any future enforcement actions you may have with ORRCO. As you know, if I observe any items of non-compliance in any of the other regions during the Transporter Project that need further investigation then I am obligated to inform of such. I am available if you need any help on this.

Cc: Jim Sachet
Dave Misko w/attachments
Scott Lamb
Chuck Clinton, Oregon DEQ



TELEPHONE RECORD

Date 2/3/99
Time a.m. p.m.

CALLED BY
 CALLED

Mr./Ms. Dave Clark
Address _____

Telephone 425/741-8639

Representing Env. Tech Services

Project _____

Discussed He was bus. partner for ~1 yr.

Using Reptex tanks

Dave & John Biggs left Clean Care ^{8 1/2 yrs.} started EnviroSafe

Moved to Woodland - 800 #, office

Bill did env. safe [↑] calls

Solvent - testing, 150 Plash solvent, filtration - 6 mos → yr.

TCP, chlor,

Bill said no - ^{its} used oil.

Ben Taylor - Clean Care -

Catch basins, enzyme sol. for remed., StormH₂O P2 plans

Signed _____

Attachment B
Sampling and Analysis Plan dated October 1985

SAMPLING AND ANALYSIS PLAN

FOR

FUEL PROCESSORS
WOODLAND, WASHINGTON

October 1985

Prepared for:
Fuel Processors, Inc.
701 Bozarth Street
Woodland, Washington

Prepared by:
Patrick H. Wicks, P. E.
2535 152nd. Avenue NE., Suite B-2
Redmond, Washington 98052

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SAMPLE COLLECTION & HANDLING 3

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INTRODUCTION

This plan has been prepared in response to the U.S. Environmental Protection Agency request for a RCRA Part B permit application on the former AARCOM facility located at this site. The site was acquired by Fuel Processors, Inc. in 1985.

The principle use of this site has been as a petroleum product bulk plant during most of its history. In more recent years, it was used reportedly by AARCOM for waste handling activities. Fuel Processors intends to use the facility for waste oil reclamation.

This sampling and analysis plan may be modified based on comments from the U.S. Environmental Protection Agency and/or included in a closure plan for this facility if necessary.

The site is located at 701 Bozarth Street, Woodland, Washington.

SITE DESCRIPTION

A plan view of the site is shown in the attached figure, Fuel Processors, Inc. Sampling Site Plan. At the site, a number of oil storage and processing tanks with associated equipment, and buildings are present. The entire site is fenced with a chain link fence, although this is not indicated on the site plan. Note that the attached site plan is not to scale and locations of various facilities are approximate. Most of the site is covered by a concrete paving and/or pads. Two areas are unpaved: the driveway and one area within the one and a half foot high concrete berm at the northwest corner of the site. Both of these are designated on the plan. The unpaved area within the concrete berm is small, measuring approximately 35 feet by 50 feet. This is the area where previous EPA samples were collected.

During late September or early October 1985, it is planned to excavate and remove potentially contaminated soil to a depth of 2 feet to 4 feet at the unpaved area within the concrete berm. This soil removal will precede any sampling as discussed below.

The locations on the site plan of previous EPA samples are based on a sketch provided by EPA. The Washington Department of Ecology (DOE) sample locations are also indicated on the site plan. These sample locations are understood to be correct, but may not be.

AVAILABLE ANALYTIC DATA

Analytic results for previous samples collected and analyzed by EPA and DOE are summarized in the attached table. This summary will be updated when results are available from the analyses discussed below.

SAMPLE COLLECTION & HANDLING

The area subject to sample collection in this plan is the unpaved area within the berm at the northwest corner of the site. Four soil sample locations have been selected using a random number generator (IBM PC computer and Lotus Symphony software). These locations are indicated in the table below, with coordinates relative to the east and north concrete berms at the boundaries of this unpaved area. A fifth sample will be collected (as a composite of two individual random samples) from the surface of the soil pile at the northwest corner of this area. Sample numbers (other than those indicated below) will be assigned at the time of sample collection. These locations are also indicated on the sampling site plan.

SOIL SAMPLE LOCATION COORDINATES, FT

	EAST OF WEST BERM	SOUTH OF NORTH BERM
Sample 1	28	4
Sample 2	8	37
Sample 3	16	19
Sample 4	31	38

Since samples cannot be collected below tank H2 and other foundations or certain equipment present in this area, any sample location indicated above will be moved either to the north, south, east or west, remaining as close as possible to the selected location. Also due to the minimal space between tanks, equipment and pipelines, in the sampling area, samples will be collected using the small backhoe, hand shovel, hand auger or other appropriate means.

Samples will be collected at 2 depths in each location, i.e., at the surface and at a depth of 5 feet beneath the surface (or until no contamination is apparent at a lesser depth). Please note that surface in this case means the surface of the ground after potentially contaminated soil has been removed from this area as discussed in the site description section above.

Samples will be collected in full duplicates for each sample in the event that the analysis planned as discussed below is insufficient to characterize conditions at the site. This would allow analysis for other parameters with the duplicate retained sample without additional sampling. An additional duplicate of one of these samples will be collected for analysis at a second analytic laboratory.

Sample collection and handling procedure will be in accordance with standard practice, including precautions to avoid cross contamination between samples (i.e., sampling devices will be cleaned between samples), proper labeling of sample containers, use of proper sample containers with respect to parameters to be analyzed, use of chain of custody procedures and forms, marking and measurement of sample locations and samples being collected by qualified personnel.

Samples will be collected within three weeks after review and concurrence by EPA of this plan.

LABORATORY ANALYSIS

Analysis of the samples discussed above will include the following:

Analysis Method (1)	# of Samples (2)	Lower detection limit, ppb (3)
PP VOLATILES SW-846 # 8240 (4)	11	1-10
PNA/PAH's SW-846 # 8100 (5)	11	1-200
PCB's SW-846 # 8080	4	100

- (1) 3 week turnaround.
- (2) 4 soil sample locations at 2 samples per location, plus 1 duplicate for analysis at a second laboratory, plus 1 soil pile sample = 10 total samples for 8240 and 8100 analysis. 2 soil sample locations at 2 samples per location = 4 total samples for PCB analysis.
- (3) Detection limits for low contamination levels; detection limits for higher contamination levels will be higher.
- (4) Expected to detect all F003 and F005 constituents except Pyridine; a forward search for 20 non-priority pollutants that would not normally be reported for method # 8240 is included.
- (5) Will not detect Pyridine (F005 constituent).

The analytic methods noted above will be sufficient to detect constituents of concern, including volatile organics, PNA's (polynuclear aromatics), PAH's (polynuclear aromatic hydrocarbons) and PCB's. Due to the analyses previously conducted by EPA and DOE, analysis for heavy metals and other parameters are believed to be unnecessary. Previous analytic results for metals indicated levels which were not at a level of concern. In addition, the planned analyses should detect all F003 and F005 hazardous waste constituents with the exception of pyridine. Analysis for pyridine is believed to be unnecessary since it is unlikely that this material was used by previous owners or operators and should not be present at the site. It has also been indicated by EPA that analysis for other 40 CFR 261 Appendix VIII constituents is not needed.

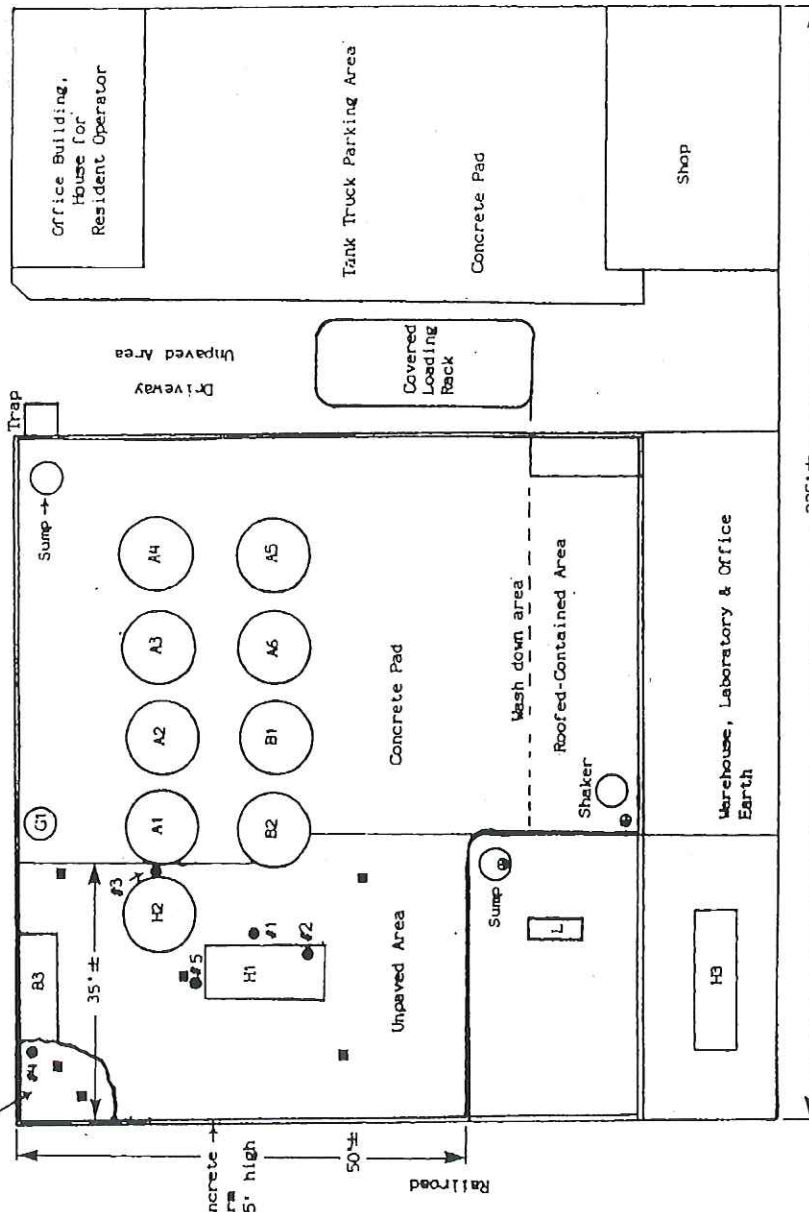
Also indicated above is the expected detection level for the various analytic procedures for relatively clean samples. For samples collected and analyzed under this plan, detection limits may be higher if significant contamination is present.

Due to budget constraints, samples collected at the surface at sample locations 1 through 4 and the soil pile composite sample will be analyzed first. If analytic results for these samples are at or below levels of concern, analysis of the deeper samples would be unnecessary and the associated expense avoided. If results for these samples are not below levels of concern, then analysis of the deeper samples would be performed.

Results of laboratory analysis are expected to be available within three weeks after delivery to the laboratory for the first set to be analyzed. As soon as results are received and reviewed by Fuel Processors, Inc., they will be provided to EPA.

Bozarth Street

slip pile
from scaping
unpaved/earth
res. 15 cu yd.



LEGEND

- EPA Sample Locations: #1
- ⊙ DOE Sample Locations

TANKS

Horizontal Above Ground

- B3 - 12,500 gal
- H1 - 15,000 gal
- H3 - 15,000 gal
- G1 - 2,500 gal

Vertical Above Ground

- F2 - 12,500 gal
- A1, A2, A3, A4, A5, A6 - 25,000
- B1, B2 - 12,500 gal each

Underground Tank

- L - 2,000 gal diesel fuel tank

Note:
Dimensions and location of
and other features are based
EPA sketch: FUEL PROCESSORS
INCORPORATED RCRA RECORDS
INSPECTION, 701 Bozarth St.,
Woodland, VA 4-16-85.
This drawing is not to scale.



Residential Area

FUEL PROCESSORS, INC. SAMPLING SITE PLAN

SCALE _____ APPROVED BY _____

DATE 10/7/85

PATRICK H. WICKS, P.E.

Consultant in Hazardous Waste Management

■ Planned Sample Locations

225' ±



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

*PO Box 47775 · Olympia, Washington 98504-7775 · (360) 407-6300
711 for Washington Relay Service · Persons with a speech disability can call 877-833-6341*

April 19, 2021

Mr. Brian Peters, L.G.
GHD
20818 44th Avenue W, Suite 190
Lynnwood, WA 98036

Re: Fuel Processors Site, Woodland, Washington – Remedial Investigation Report

Dear Brian Peters:

GHD submitted an Agency Review Draft Remedial Investigation (RI) report for the Fuel Processors Site (Site) in Woodland, Washington, to the Department of Ecology (Ecology) on January 22, 2020. Ecology reviewed the report and responded with comments by letter dated May 18, 2020. GHD responded to Ecology's review comments by letter dated August 10, 2020.

Ecology has determined that the Agency Review Draft RI report has the basic requirements required by WAC 173-340-350. However, the report continues to contain material that Ecology previously addressed in 2012 when Shell Oil (Shell) responded to Ecology naming Shell as a Potentially Liable Person (PLP) for the Site. Ecology also does not concur with statements in the RI report about certain laboratory reports and opinions regarding the contamination and allocation or liability for the releases. While such statements could be correct, Ecology must consider all reports and data when developing the required cleanup action, including laboratory reports from other PLPs that appear to contradict statements in the RI report.

After consideration of GHD's response and the Agency Review Draft RI, Ecology concurs with some, but not all, of GHD's responses. Instead of further delaying the RI process and to move forward with the feasibility study, Ecology proposes that you submit a final Agency Review Draft RI report with the changes GHD agreed to in the August 10, 2020, letter and provide Ecology with an electronic copy.

For the Public Review Draft RI report, Ecology will add statements via comment bubbles or other documentation to the Agency Review Draft RI report prepared by GHD. These additional agency comments will note where Ecology does not have a basis to agree with the statement or where there is contradictory technical data in the record. The comments we will include will be similar in content to our May 18, 2020, comment letter. Also, Coles & Associates conducted sampling studies and produced reports prior to GHD's more recent involvement with the Site. Ecology will add a report produced by Coles & Associates as an appendix to the Public Review Draft RI report.

Brian Peters
April 16, 2021
Page 2

Please email me at chof461@ecy.wa.gov if I can provide additional information or answer any questions.

Sincerely,



Charles P. Hoffman, P.E.
Environmental Engineer
Hazardous Waste & Toxics Reduction Program
Southwest Regional Office

Enclosure

cc: Bill Briggs, ORRCO
Andrea Wing, Shell Oil
Jeff Bullen, Shell Oil
Dave Coles, Coles & Associates
Jill Betz, Coles & Associates