



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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September 29, 2021

Jeff Gaarder  
GHD Services Inc.  
20818 44th Avenue W., Suite 190  
Lynnwood, WA 98036

Re: Fuel Processors Inc. Facility, 701 Bozarth Avenue, Woodland, Washington – Public Notice  
on Public Review Draft Remedial Investigation Report

Dear Jeff Gaarder:

This letter has been prepared to inform you that the Washington State Department of Ecology (Ecology) is preparing to submit for public notice the attached public review version of the Draft Remedial Investigation Report (Draft RI Report) for the Fuel Processors Facility at 701 Bozarth Avenue in Woodland, Washington (Site).

An agency review version of the Draft RI Report prepared by GHD Services, Inc. (GHD) on behalf of Equilon Enterprises LLC dba Shell Oil Products (Shell) was submitted to Ecology on January 22, 2020. Ecology reviewed the report and responded with comments in a letter dated, May 18, 2020. GHD responded to Ecology's review comments in a letter dated August 10, 2020. The response to comments letter proposed modifications to the Draft RI Report to address some of Ecology's comments.

In a letter dated April 19, 2021, Ecology informed GHD that Ecology had reviewed the response to comments letter and concurs with some, but not all, of the GHD responses. Additionally, based on the review, Ecology determined that a version of the Draft RI Report modified as described in the GHD response to comments letter likely would meet the requirements for remedial investigation reports described in Washington Administrative Code (WAC) 173-340-350.

Ecology proposed GHD submit an electronic version of a final agency review version of the Draft RI Report that includes the modifications agreed to by GHD in the August 10, 2020 response to comments letter. Ecology indicated that submittal of this version of the report would help avoid further delays in the remedial investigation process and be used to prepare a version of the Draft RI Report for public review. GHD submitted the modified version of the Draft RI Report to Ecology on May 18, 2021.

The attached public review version of Draft RI Report was prepared using the modified version of the Draft RI Report prepared by GHD and consistent with the April 19, 2021 letter from Ecology, includes the following:

- Additional Ecology comments inserted to note where Ecology does not have a basis to agree with or there is technical data contradicting a particular statement for the Site. The comments are similar in format and content to those presented in

Ecology's May 18, 2020 comment letter. One of the comments indicates that Ecology does not, based on currently available information, concur with statements in the Draft RI Report regarding certain laboratory reports and opinions about the liabilities for releases at the Site. These statements may potentially be correct; however, they are not relevant for the RI and apparently contradict conclusions based on information provided by other potentially liable parties for the Site. Ecology must consider all reports and data when developing a required cleanup action.

- Appendices on supplemental historical documents not presented in the Draft RI Report, including but not limited to reports describing sampling studies prepared by Coles & Associates LLC prior to GHD's more recent involvement with the Site.

The additional Ecology comments and the appendices are included in an enclosure with this letter.

After public review has been completed, consistent with Agreed Order No. DE 5054, the potentially liable parties for the Site will prepare a feasibility study and draft cleanup action plan for the Site.

Please contact me indicating your concurrence with the proposed next steps, or contact Kaia Petersen at [kaia.petersen@ecy.wa.gov](mailto:kaia.petersen@ecy.wa.gov) or (360) 764-0886 if you need additional information or have any questions.

Sincerely,



Michelle Underwood, Section Manager  
Hazardous Waste and Toxics Reduction Program  
Southwest Regional Office

Enclosure: Comments and Appendices

Sent by email: Jeff Gaarder ([jeff.gaarder@ghd.com](mailto:jeff.gaarder@ghd.com))

cc: Bill Briggs, ORRCO ([billb@orrcobiz.com](mailto:billb@orrcobiz.com))  
Scott Briggs, ORRCO ([scottb@orrcocycles.com](mailto:scottb@orrcocycles.com))  
Andrea Wing, Shell ([Andrea.Wing@Shell.com](mailto:Andrea.Wing@Shell.com))  
Jeff Bullen, Shell ([Jeff.Bullen@Shell.com](mailto:Jeff.Bullen@Shell.com))  
Dave Coles, Coles & Associates ([dcolescec@comcast.net](mailto:dcolescec@comcast.net))  
Jill Betts, Coles & Associates ([jill@colesandbetts.com](mailto:jill@colesandbetts.com))