

1. Delete the transmittal page.
2. Add a cover page, label the RI Report as Public Review Draft, and insert the following on the front page of the RI report:

The Department of Ecology (Ecology) has determined that the information presented in this Remedial Investigation Report (RI Report) fulfills the purpose for remedial investigations described in Washington Administrative Code (WAC) 173-340-350(7)(a); specifically, Ecology has determined that this RI Report includes the data necessary to adequately characterize the site for the purpose of developing and evaluating cleanup action alternatives to address the known environmental conditions for the Site described in the RI Report.

This RI Report has added the following supplemental information to this report to facilitate the Public Review.

- Comments where appropriate to identify statements and conclusions with which Ecology does not concur.
 - Letters retained in Ecology files regarding the following:
 - Designating Shell Oil Products US (Shell) as a potentially liable party for performing a remedial investigation and feasibility study (FS) and preparing a draft cleanup action plan (CAP) for the site pursuant to Agreed Order No 5054; and
 - Describing Ecology's review and comments to the RI Report.
3. To the end of the list of appendices, add Appendix J **Letters designating Shell Oil Products US (Shell) as a Potentially Liable Party (PLP)** and Appendix K **Letters with Department of Ecology's review and comments on the RI Report**.
 4. Insert the following statements at the locations indicated:

- a. Page 2. Section 2.1. After the second full paragraph:

Additional information regarding removal and decommissioning of fueling infrastructure was included in a Closure Report dated September 12, 2007 (Closure Report) prepared by Fuel Processors Inc. (FPI) and submitted to Ecology and a letter dated December 13, 2005 (ORRCO letter) prepared by Oil Re-Refining Co. (ORRCO) and submitted Ecology.

According to the Closure 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 indicates that all used oils, oily solids, and contaminated rinse water were transported to the FPI Portland facility for treatment and disposal. The closure report states as follows:

"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."

According to the ORRCO letter sump H-3 was cleaned on October 13, 2005. The ORCO letter includes photographs and 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.

b. Page 2. Section 2.2. After the first paragraph:

Additional information regarding the release of used oil was presented in a report titled, "Initial Site Investigation: Fuel Processors Inc., Facility, 701 Bozarth Avenue, Woodland, WA" dated December 15, 2011 (used oil release report) and in a letter from Ecology to Conestoga-Rovers & Associates dated August 10, 2012.

The used oil release report states the following:

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).

The letter from Ecology states 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.

c. Page 6. Section 2.6. After the paragraph for "1985-2002".

The leaking drum was an 85-gallon overpack drum that was observed by an Ecology inspector on August 28, 1991. The drum was observed 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 the site on September 5, 1991, accompanied by an EPA employee.

Drums of apparent waste gasoline were stored at the facility. 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.

An August 10, 2012 letter from Ecology to Conestoga-Rovers & Associates provides additional information regarding the drums of "waste gasoline". In the letter, Ecology indicates the following:

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.

d. Page 11. Section 4.1.2.3. After end of first full paragraph:

Coles & Associates collected soil samples from borings HP-6 and HP-7 in 2008 and HP-13 in 2015. The laboratory results for the soil samples are summarized in Table 1 of the RI Report. Gasoline-diesel-, and heavy-oil range petroleum hydrocarbons and fuel-related compounds were detected in the soil samples; therefore, the presence of petroleum-impacted soil beneath the warehouse floor was known prior to the boring and well installation in July and August 2018.

e. Page 18. Section 4.7. After the partial paragraph at the top of the page:

Ecology does not concur with the following conclusion reportedly made by Pace Analytical (Pace) regarding a fuel fingerprinting analysis performed on samples of separate phase hydrocarbons (SPH) collected from monitoring well MW-10 in May 2016 and February 2019: “assuming a moderate subsurface weathering regime on-Site, it is plausible that the petroleum may have experienced a residence time in the environment of 0-8 years”. Evidence sufficient to support this conclusion has not been presented to Ecology.

f. Page 18. Section 4.7. After second full paragraph:

Shell Oil owned the entire Property and by this ownership had access to the entire Property, including but not limited to areas that housed Shell terminal infrastructure. This was previously addressed in a letter from Ecology to Conestoga-Rovers & Associates (now GHD) dated August 9, 2012.

g. Page 24

Ecology acknowledges that GHD Services Inc. has certified that this report was prepared by a Licensed Geologist registered in the State of Washington. The supplemental information provided by Ecology is not intended to impugn the statements, opinions, or conclusions of that Licensed Geologist.

5. Add Appendix J and Appendix K to the end of the report.