

Feasibility Study Work Plan

Fuel Processors, Inc.
701 Bozarth Ave.
Woodland, WA 98674

Facility Site ID: 810
Cleanup Site ID: 76

Date: July 28, 2022

Purpose

The purpose of the feasibility study (FS) is to develop and evaluate cleanup action alternatives to enable cleanup action to be selected for the Fuel Processors, Inc. facility located at 701 Bozarth Avenue in Woodland, Washington (the site). This Work Plan outlines the process that will be utilized to develop and prepare the Feasibility Study per WAC 173-340-350 (8) and -360.

Contents of Feasibility Study:

Introduction:

The introduction will include a brief summary of the RI results and previous site investigations. This includes:

- A brief background of the site, site investigations, and interim actions.
- The results of any additional investigations conducted since completion of the RI.
- A Conceptual Site Model that describes the location, extents, estimated amount, and concentration distribution of contaminants of concern greater than proposed screening levels for each affected medium.
- Preliminary cleanup levels for each indicator hazardous substances in each medium. Cleanup levels, and as necessary remediation levels for each cleanup action component (e.g., dig and haul, and treatment of soils left in-place) will be discussed in the FS. Detailed information on establishing potential remediation levels to be evaluated in the FS will be completed in compliance with WAC 173-340-355.
- Proposed points of compliance for each affected medium, if different from standard.
- Applicable local, state, and federal laws.

Alternatives:

The FS will describe the remedial action objectives for the site and their compliance with MTCA.

A reasonable number and types of alternatives will be identified. This will include a brief description of each alternative. At least one permanent alternative and at least one alternative with a standard point of compliance will be included. Alternatives must meet the minimum requirements in WAC 173-340-360(2) and follow the requirements for a disproportionate cost analysis in WAC 173-340-360(3)(e).

Cleanup alternatives will be briefly evaluated based on each alternative's ability to eliminate, reduce, or otherwise control the contaminants' risks posed through each exposure pathway and migration route. "Dig and haul" of contaminated soil and debris is the preferred alternative based on the site's hydrogeology and the costs to complete other cleanup alternatives.

The details of the dig and haul, including buildings' demolition, the contaminated soil volume removal, including removal depth and procedure for removal will be set forth in the FS. Limitations due to property boundaries, utilities, and railroad alignment work zone buffers will also be addressed.

Management of any contaminated soil that must remain in-place because it cannot be removed will also be addressed in the FS. Examples of soils that cannot be removed include soils in the railroad work zone buffer and soils in the right of way and/or below municipal or private utilities.

Screening of Cleanup Alternatives:

The FS will describe how each alternative meets the criteria outlined below. Alternatives must meet the threshold requirements and use permanent solutions to the maximum extent practicable.

- Protect human health and the environment ,
- Comply with cleanup standards,
- Comply with applicable state and federal laws,
- Provide for compliance monitoring, and
- Provide for a reasonable restoration timeframes according to WAC 173-340-360(4).

Following a disproportionate cost analysis (DCA), the FS will compare and contrast each alternative for each of the following criteria. Rank each alternative from most to least permanent, based on the evaluation of:

- Protectiveness,
- Permanence,
- Cost,
- Effectiveness over the long-term,
- Management of short-term risks,
- Technical and administrative implementability, and
- Consider public concerns.

Remedy Selection:

The FS will detail the rationale behind the selection of the preferred alternative and will detail how the alternative meets the expectations of WAC 173-340-370 and addresses public concerns.

The FS will follow the format in the **Feasibility Study Checklist** (Toxics Cleanup Program, Ecology publication no. 16-09-007, May 2016 (<https://apps.ecology.wa.gov/publications/documents/1609007.pdf>)).

The FS will include the following figures:

- Vicinity Maps,
- Site Maps, and
- Conceptual Site Model.

The FS will include the following tables:

- ARARs,
- Evaluation of remedial alternatives,
- Cost/quantity summary, and
- Cost detail for alternatives.

Date The FS Will Be Submitted to Ecology

The Agency Review Draft FS will be submitted to Ecology on or before the end of business on September 30, 2022.

This date may shift based on:

- availability of contractors to provide their proposed approach to site remediation and cost information,
- availability of surveyor to identify property boundaries relative to contaminated soil locations and railroad alignment setbacks and municipal and private utilities; and
- City of Woodland and railroad availability to provide information as to how far excavation can occur within their properties/right of ways.

Every attempt will be made to meet this FS submittal deadline. Department of Ecology will be notified of the FS progress on a weekly basis and will be notified immediately of any delays.

A revised FS will be submitted to Ecology within 45 days of receiving Ecology's written comments on the Agency Review Draft FS.