

Atlantic Richfield Company

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VIA CERTIFIED MAIL

October 16, 2009

Ms. Carrie Pederson
State of Washington
Department of Ecology
Toxics Cleanup Program
Northwest Regional Office
3190 160th Avenue SE
Bellevue, Washington 98008-5452

Re: Reported Release of Hazardous Substances
Atlantic Richfield Company site list

Dear Ms. Pederson:

I am writing in response to your letter dated August 18, 2009, in which you explained that the Department of Ecology proposed to find Atlantic Richfield Company (ARC) liable for the release of hazardous substances at 114 sites listed in Enclosure 1 to your letter. The sites supposedly operated under the ARCO, BP or Amoco names.

In response to your letter, ARC researched its corporate records for information relating to each site. I appreciate you providing me with an electronic version of the site list, which I have edited to include a column explaining the results of ARC's research. The sites fall into four categories:

- 1) Sites where ARC located corporate records indicating that ARC or a related entity previously or currently owned or operated the site, and where environmental cleanup is underway.
- 2) Sites where ARC located corporate records indicating that ARC or a related entity previously or currently owned or operated the site, but ARC is not aware of a release of hazardous substances and no environmental cleanup is underway.
- 3) Sites where ARC did not locate corporate records indicating that ARC or a related entity previously or currently owned or operated the site, but ARC located records indicating that a contract dealer (independent business) operated a service station.
- 4) Sites where ARC did not locate corporate records indicating that ARC or a related entity previously or currently owned or operated the site.

For the sites in categories 1 and 2, ARC might be a potentially liable party to the extent there was a release of hazardous substances during ARC's ownership or operation of the site. However, in many cases there may have been prior or subsequent owners or operators who are liable for releases.

For the sites in categories 3 and 4, ARC would not be a potentially liable party. I would appreciate it if you shared any evidence you have that ARC owned or operated the sites in categories 3 and 4.

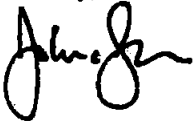
rec'd
10-19-09
DOE
release 4195
arco stn # 4090
Seattle
entered
CP
3-30-10

October 16, 2009

Lastly, several sites on the list are larger facilities, such as refineries and terminals. ARC requests that these larger facilities, which may already be subject to an Ecology site-specific Order, not be included in Ecology's effort to develop a multi-site Order for ARCs sites. In our experience, larger sites tend to have unique circumstances that do not lend themselves to a multi-site approach.

Please contact me at your convenience with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Skance". The signature is fluid and cursive, with the first name "John" being the most prominent.

John C. Skance
Strategy Manager - US Retail & Logistics

Enclosure

cc: Douglas Reinhart, BP Legal

Atlantic Richfield Company - response to Enclosure 1 of Ecology 8/18/09 letter

Atlantic Richfield Company Site #	Ecology UST ID	ALT Name	Address	City	Atlantic Richfield Response
4217	230	Arco Handy Mart	150 SW 160th St	Burien	ARC records indicate past/current ownership/operations at the site. The site also was a contract dealer site. ARC records indicate the city as Seattle.
4402	1521	Arco Station Larry's	1904 Wetmore Ave	Everett	ARC records indicate past/current ownership/operations at the site. The site also was a contract dealer site.
Cherry Point Refinery	6126	Arco Refinery Ferndale	4519 Grandview Rd	Ferndale	ARC records indicate past/current ownership/operations at the site. ARC records indicate the city as Blaine.
01964	6328	BP Oil Station #01964	16405 SE 272nd St	Covington	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway. ARC records indicate the city as Kent.
	6337	BP Station #11349	305 A St SE	Auburn	ARC records revealed no information for this address
	8486	Unocal Station #5897	1600 SW 312th	Federal Way	ARC records revealed no information for this address
4484	8769	Arco 8769	24001 Pacific Hwy S	Kent	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
4445	8778	Arco Station #4445	2020 SW 356th St	Federal Way	ARC records indicate past/current ownership/operations at the site
890	9049	Arco Dicks	1802 Broadway	Everett	ARC records indicate past/current ownership/operations at the site. The site also was a contract dealer site.
03112	9504	Exxon Station #7-6107	721 228th Ave NE	Redmond	ARC records indicate past/current ownership/operations at the site
11263	10180	BP Oil Station #11263	1221 4th Ave	Marysville	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
	10362	U-Save Oil BP Station Kenmore	6115 Bothell Way NE	Kenmore	ARC records revealed no information for this address
	10363	U-Save Oil BP Station Auburn	601 Auburn Way S	Auburn	ARC records indicate site operated only as a contract dealer. No confirmed ARC past/current ownership/operations at the site. ARC records indicate the address as 615 Auburn Way.
4473	101130	Arco Station #4473	9506 19th Ave SE	Everett	ARC records indicate past/current ownership/operations at the site
1118	200010	BP Station Wong (Former)	12354 15th NE	Seattle	ARC records indicate past/current ownership/operations at the site. The site also was a contract dealer site.
	619150	Helms Property (former Arco)	12455 Tukwila Int'l Blvd	Tukwila	ARC records revealed no information for this address
	7449	BP Service Station	3215 4th Ave S	Seattle	ARC records revealed no information for this address
0977	1651	Arco Station 0977-Daves	155 NW 85th	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
0818	3263	Arco Facility 0818	3201 20th Ave W	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5567	3825	Arco 5567	401 Ellingson Rd	Pacific	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.

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5377	5272	Arco Station 5377	13131 19th Ave SE	Everett	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
4051	5970	Arco 4051-Greenlake Gas & Food	7002 Woodlawn Ave NE	Seattle	ARC records indicate past/current ownership/operations at the site
0409	8736	Arco Station #0409	13515 Ambaum Blvd SW	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
0822	8738	Arco Station #822	202 5th Ave S	Edmonds	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
836	8739	Arco Station #0836	11611 NE 8th St	Bellevue	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
921	8740	Arco Station #0921	4030 Rucker Ave	Everett	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
0980	8742	Arco Station #0980	10822 Roosevelt Way NE	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
0986	8743	Arco Station #0986	14359 15th NE	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
4090	8746	Arco Station #4090	2200 4th Ave S	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
4228	8748	Arco Station #4228	10402 SE 256th	Kent	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
4291	8751	Arco Facility 4291 (former)	801 NE 65th St	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
4368	8758	Arco Station #4368	17605 SE 108th Ave	Renton	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
4393	8766	Cameron Enterprises V	1515 164th St SW	Lynnwood	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
4466	8773	Arco Station #4466	800 Front St	Issaquah	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
4451	8776	Arco Station #4451	10504 Aurora Ave N	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5243	8779	Arco Station #5243	31855 Pacific Hwy S	Federal Way	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5242	8780	Arco Station #5242	17001 Bothell Way NE	Lake Forest Park	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway. ARC records indicate the city as Seattle.
5241	8781	Arco Station #5241	2202 S 320th St	Federal Way	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5238	8784	Arco Station #5238	175 Rainier Ave S	Renton	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5219	8787	Arco Facility #05219/IRC INC	21214 84th Ave S	Kent	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5218	8788	Arco Station #5218	7200 E Marginal Way S	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5207	8789	Arco Station #5207	401 Park Ave N	Renton	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.

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6067	8795	Arco Station #6067	8009 164th Ave NE	Redmond	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
6031	8796	Arco Facility 6031	11450 NE 124th St	Kirkland	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
6026	8797	Arco Station #6026 (1989)	17200 140th Ave SE	Renton	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
ARCO Seattle Terminal (21T)	8803	Arco Tank Farm	1652 SW Lander St	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway. The site already has a Consent Decree with Ecology as part of the Harbor Island Operable Unit.
6217	8805	Arco Station #6217	12903 NE 20th St	Bellevue	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
6214	8806	Arco Station #6214	4812 196th St	Lynnwood	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
6209	8808	Arco Station #6209	950 N 85th St	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
6199	8809	Arco Station #6199	125 Samish Way	Bellingham	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
6194	8810	Arco Station #6194	610 Hwy 20 W	Burlington	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
6175	8812	Arco Facility #6175/Lotus Goodhill Food Mart LLC	3910 S 320th St	Auburn	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
6162	8814	Arco Station #6162	1403 NW Sammamish Rd	Issaquah	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
6155	8815	Arco Station #6155	5800 Southcenter Blvd	Tukwila	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
03146	9502	Exxon Station #7-3535	8408 N Aurora Ave	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
03144	9555	BP Oil #03144	26821 Maple Valley Hwy	Maple Valley	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11064	10131	BP Oil #11064	13310 Interurban Ave	Tukwila	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11048	10132	Tocso (BP) Station #11048	15846 1st Ave S	Burien	ARC records indicate past/current ownership/operations at the site.
11255	10133	BP Oil Station #11255	19924 Int'l Blvd	Seatac	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11069	10134	BP Oil Station #11069	1517 W Dravus St	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11067	10136	BP Oil Station #11067	15615 NE 8th St	Bellevue	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11062	10138	BP Oil Station #11062	11001 Roosevelt Way NE	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11060	10140	BP Oil Station #11060	4580 Fauntleroy Way SW	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.

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11071	10142	BP Oil Station #11071	11848 NE 85th St	Kirkland	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11063	10144	BP Oil Station #11063	9800 NE 116th St	Kirkland	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11051	10145	BP Oil Station #11051	720 N Central Ave	Kent	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11050	10147	BP Oil Station #11050	2535 S 320th St	Federal Way	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11047	10148	Tosco Station #11047	33520 21st Ave SW	Federal Way	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11061	10162	BP Oil Station #11061	5100 NE 25th Ave	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11093	10169	BP Oil #11093	16320 Mill Creek Blvd	Mill Creek	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11066	10172	BP Oil Station #11066	2421 148th Ave NE	Bellevue	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11068	10173	BP Oil Station #11068	28718 Military Rd	Federal Way	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11096	10182	BP Oil Station #11096	7601 Lake Ballinger Way	Edmonds	ARC records indicate past/current ownership/operations at the site
11264	10183	BP Oil Station #11264	301 W Mukilteo Blvd	Everett	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11265	10187	BP Oil Station #11265	4102 Rucker Ave	Everett	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5375	97529	Arco Facility 5375	6966 Coal Creek Pkwy SE	Newcastle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5373	97530	Arco Facility #05373/Veer Kumar Inc	2125 E College Way	Mt Vernon	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5363	97531	Arco Station 5363	27202 Pacific Hwy S	Federal Way	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5246	97535	Arco Station #5246	5620 Martin Luther S	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5445	97618	Arco Facility 5445	665 23rd Ave	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5544	97711	Arco Facility 5544 (former)	19918 68th Ave S	Kent	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5491	97712	Arco Station #5491	1537 Duvall NE	Renton	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5581	99027	Arco Station #5581	830 Moore St	Sedro-Woolley	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5508	100008	Arco Facility 5508	1306 112th St SW	Everett	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
11054	100035	BP Oil Station #11054	21208 68th Ave S	Kent	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.

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5665	100392	Arco Facility 5665	3825 Harbor Point Blvd	Mukilteo	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5810	101055	Budget Rent A Car	2101 6th St	Bremerton	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
5902	102352	Arco Facility 05902	710 S Grady Way	Renton	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
862	200506	Schoner Square	196th St SW & 37th Ave W	Lynnwood	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway. ARC records indicate an address of 3701 196th St. SW. Note: Duplicate site as Ecology #8096
5236	421749	Arco Station 5236 (former)	14656 Ambaum Blvd SW	Burien	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
	819494	Arco 1166	14653 1st Ave S	Burien	ARC records revealed no information for this address
913	3101	BP Station Reynolds Bremerton	1534 6th St	Bremerton	ARC records indicate past/current ownership/operations at the site. ARC records indicate an address of 1546 6th Street
	3645	BP Sta. Burlington Wash Rack	100 N Burlington Blvd	Burlington	ARC records revealed no information for this address
	6338	Ernie's BP Enumclaw	320 Griffin Ave	Enumclaw	ARC records revealed no information for this address
862	8096	Pacific Center's Old Arco/Arco Stn 862	3701 196th SW	Lynnwood	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway. Note: Duplicate site as Ecology #2000506
	8179	Arco Schauer	8819 14th Ave S	Seattle	ARC records indicate site operated only as a contract dealer. No confirmed ARC past/current ownership/operations at the site
	8344	BP Station Stokes	7833 SE 28th St	Mercer Island	ARC records revealed no information for this address
03102	9544	Exxon Station #7-0337	1960 148th NE	Redmond	ARC records indicate past/current ownership/operations at the site
03128	9546	Exxon Station #7-2421	4715 NE Sunset Blvd	Renton	ARC records indicate past/current ownership/operations at the site
	9683	Starvin Sams Arco #8	4209 Meridian St	Bellingham	ARC records revealed no information for this address
	10139	BP Station Brooklyn (former Mobil 99-D9T)	4557 Brooklyn Ave	Seattle	ARC records revealed no information for this address
11053	10141	BP Oil 11053	2022 S Puget Dr	Renton	ARC records indicate past/current ownership/operations at the site
11046	10170	BP Oil Station #11046	33800 1st Way S	Federal Way	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
02607	10326	BP Branded Station #02607	10744 Silverdale Way	Silverdale	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.

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Former BP Ferndale Refinery	10735	BP Station Ferndale Refinery	3901 Unick Rd	Ferndale	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
	10892	BP Station Oak Harbor	1366 W Pioneer Way	Oak Harbor	ARC records revealed no information for this address
5568	99028	Arco Station Covington	17450 SE 272nd St	Covington	ARC records indicate past/current ownership/operations at the site
	99039	BP Oil Station #11352	18725 Bothell Way NE	Bothell	ARC records indicate site operated only as a contract dealer. No confirmed ARC past/current ownership/operations at the site
4137	100259	Arco Station 99 Market	6132 Evergreen Way	Everett	ARC records indicate past/current ownership/operations at the site
	100543	Sedgwick One Stop BP	1701 SE Sedgwick Rd	Port Orchard	ARC records revealed no information for this address
02606	100598	BP Station #5522	10023 Old Frontler Rd NW	Silverdale	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.
	100626	Templetons Grocery	1116 Charleston Beach Rd	Bremerton	ARC records revealed no information for this address
0980	200860	Arco 0980 Caribbean House Apts	10800 Roosevelt Way NE	Seattle	ARC records indicate past/current ownership/operations at the site. Environmental cleanup underway.