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**STATE OF WASHINGTON  
WHATCOM COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,  
DEPARTMENT OF ECOLOGY

Plaintiff,

v.

CAMPBELL LAND CORPORATION;  
and JAGROOP S. GILL,

Defendants.

NO. 21-2-01292-37

DECLARATION OF SUNNY  
BECKER

RE: THIRD MOTION TO AMEND  
APRIL 11, 2022 ORDER

I, SUNNY BECKER, declare under penalty of perjury that the following is true and correct.

1. I am a resident of the state of Washington, over the age of 18 years, competent to make this declaration, and make this declaration from my own personal knowledge and judgment.

2. I previously submitted declarations for this matter that I signed on March 13, 2023, and March 28, 2024, which were submitted in support of the Plaintiff State of Washington, Department of Ecology’s (Ecology) First and Second Motions to Amend the Court’s April 11, 2022 Order Granting Injunctive Relief to Plaintiff.

3. I am Ecology’s Toxics Control Program project coordinator for the Treoil facility located at 4242 Aldergrove Road, Ferndale, Washington. In this position, I oversee the various stages of the investigation and cleanup of contamination in the different types of media (e.g., soil,

1 groundwater, surface water) at a site pursuant to the state's Model Toxics Control Act (MTCA)  
2 (RCW 70A.305) and its regulations (WAC 173-340).

3 4. Since this Court issued its May 3, 2024 Order Granting Ecology's Motion to  
4 Amend its April 11, 2022 Order, I have been working on the finalization of the MTCA  
5 remedial investigation for the Treoil site. As part of that work, I had Ecology contractors,  
6 Haley & Aldrich, Inc., conduct supplemental sampling of surface waters at the site on  
7 December 12, 2024. I, along with Hazardous Waste Compliance Inspector Mindy Collins,  
8 accompanied Ecology's contractors on this December 12, 2024, site visit.

9 5. During the December 12, 2024, site visit, I observed abandoned/wrecked  
10 vehicles and a burned-out camping trailer at the site. As I have noted in an earlier declaration  
11 to this Court, fluids such as gasoline, oil, transmission fluid, and power steering and brake  
12 fluids can leak from vehicles, which can result in the contamination of soils, groundwater, and  
13 surface water. Also, during the site visit, I took photographs documenting some of the  
14 conditions and waste at the property. Attached hereto as Exhibit A is a true and correct copy  
15 of a photograph that I took during my December 12, 2024, inspection of the Treoil facility  
16 showing the inside of one of the buildings at the site with dried oil on the floor.

17 6. The remedial investigation for the Treoil site found that levels of total  
18 petroleum hydrocarbons (TPH), pentachlorophenol, a Semi-volatile Organic Compound  
19 (SVOC), and metals (primarily chromium, copper, and lead) in the soil exceeded standards  
20 under MTCA.

21 7. Using the results of the remedial investigation, Haley & Aldrich, Inc.,  
22 produced a draft feasibility study, which evaluated three different alternative cleanup  
23 methods. Ecology and/or its contractors will continue to need access to the Treoil site to  
24 prepare for, and possibly undertake, the remedial cleanup action that will be implemented at  
25 the site.

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