



# Treoil Industries Cleanup Site

Public Comment Period: Mar 24, 12:00 am – Apr 22, 11:59 pm, 2025  
Remedial Investigation, Feasibility Study, & Public Participation Plan

**Online Open House: April 2, 2025**





# Welcome to our online open house.

## Join

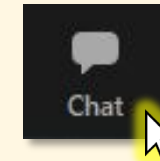
Connect Audio & Join



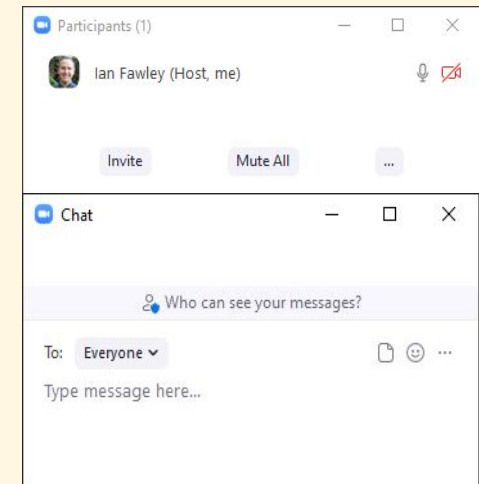
**Tip** Try your computer audio *first*.

If you'd like, you can test your speaker and microphone *before* joining.

## Participate



Question?  
Need help?  
Chat with us!



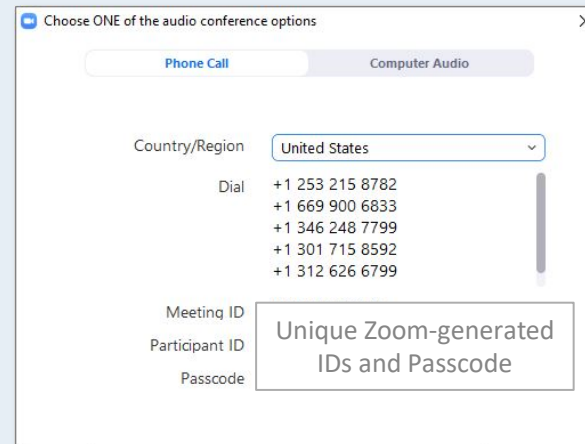
Turn on the Chat box and Participant list from your toolbar.

## Audio

**A** Best Option: Use computer for audio

**B** If selecting "Phone Call"...

- Dial: **253 215 8782 (Tacoma)**
- Enter Zoom Meeting ID **831 4702 2217** followed by "#"
- Enter your unique Zoom Participant ID, followed by "#"
- (If you do not enter the Participant ID, you will be prompted to enter the Passcode.)



# Online Open House Flow



1. Review the silent, looping slideshow. Slides will advance every 30 seconds, for a total of ten minutes.
2. Ask questions in the chat or raise your hand to be unmuted.
3. We will answer your questions one by one.





# Ecology Staff Available Today

**Sunny Becker** (in-person)

Ecology Toxics Cleanup Program  
Site Manager

**Mindy Collins** (in-person)

Ecology Hazardous Waste & Toxics Reduction Program  
Compliance Team Lead, Northwest Region Office

**Andrew Kaparos** (in-person)

Haley Aldrich, Engineer

**Thomas Perkow** (online)

Ecology Hazardous Waste & Toxics Reduction Program  
Compliance Unit Supervisor, Northwest Region Office

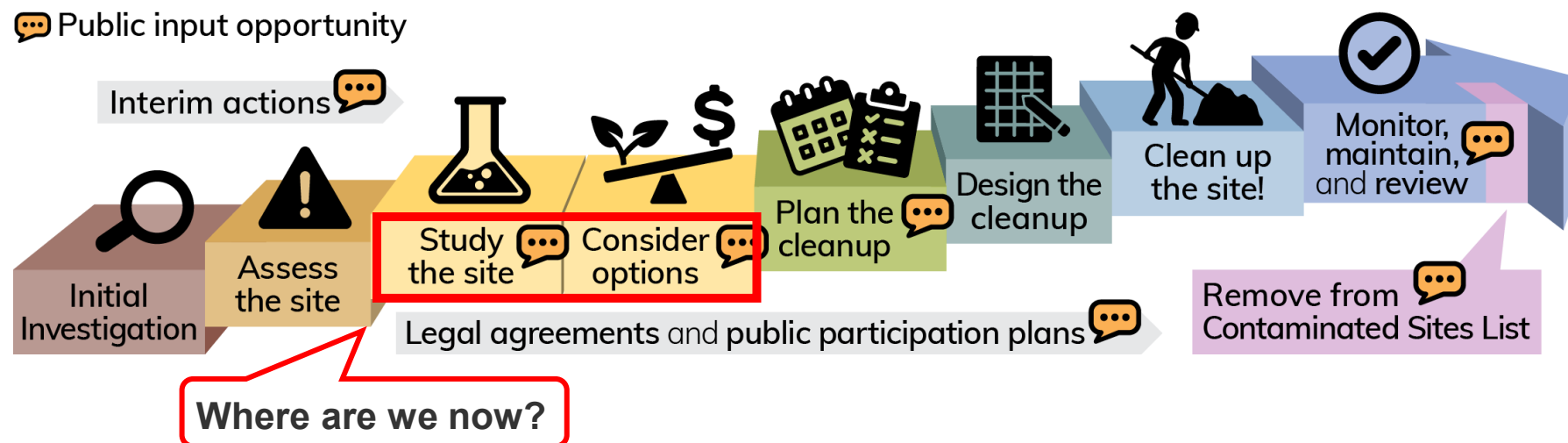
**Kristen Forkeutis**

(in-person and online)

Ecology Toxics Cleanup Program  
Community Outreach Specialist

# Washington's Cleanup Process

- The Model Toxics Control Act (MTCA) is Washington's environmental cleanup law. It provides requirements for contaminated site cleanup and sets standards that protect human health and the environment.
- WA Dept of Ecology (Ecology) enacts MTCA and oversees cleanups.
- The MTCA cleanup process is completed in steps over a variable timeline.



# Site Details

## Site Name:

Treoil Industries

## Site Address:

4242 Aldergrove Road  
Ferndale, Washington

Facility Site ID: 2919

Site Cleanup ID: 950





# Site Background

- 34-acre property with a 3.5-acre section used since the 1980s for tall oil processing, biodiesel production, and other small-scale industrial operations.
- Over the decades, the property accumulated a large amount of dangerous wastes that were left unsecured and often improperly stored.





# History of Investigations & Enforcement

**1989–2016:** Ecology's Water Quality Program, Ecology's Hazardous Waste and Toxics Reduction Program, and Whatcom County Health & Human Services performed inspections and assessments.

- The property was placed on Ecology's Contaminated Site List.
- Ecology issued a legal order in 2015 requiring the owner to identify, manage, and dispose of the waste.





# History of Investigations & Enforcement

**2017:** The site did not meet the requirements of the order, causing risks to human health and the environment. At Ecology's request, the Environmental Protection Agency (EPA) performed an emergency action, which removed:

- 93,000 gallons of liquid tall oil and tall oil derivative wastes
- 275 tons of contaminated soil, sludge and debris
- 6,750 gallons of crude glycerin
- 430 containers, 35 drums and nine cylinders of hazardous chemicals
- Eight cubic yards of asbestos containing material



# History of Investigations & Enforcement

**2022:** Conditions were similar to or worse than before the 2017 cleanup. The EPA conducted a second action, which removed:

- 97,400 gallons of oily liquid from secondary containment
- 18,000 gallons of hazardous liquids
- 3,316 tons of solidified material
- 4,800 gallons of pumpable oily material
- 1,890 gallons of corrosive liquids
- Eight cubic yards of solidified hazardous materials

The 2017 and 2022 cleanup actions cost a total of approximately \$4.3 million.





# History of Investigations & Enforcement

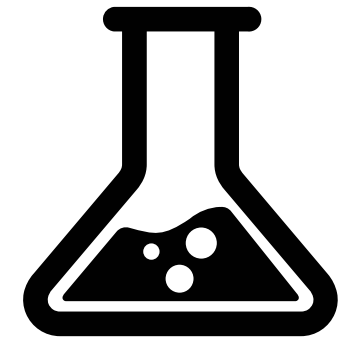
## 2023–2024

- Ecology issued a \$900,000 penalty to the owner for failure to comply with WA's dangerous waste laws.
- Ecology's Toxics Cleanup Program finalized a contract with consulting firm Haley & Aldrich (HA) to begin the formal cleanup process under the Model Toxics Control Act (MTCA).
- As of December 2024, abandoned vehicles, garbage, debris, and other signs of illegal use have been observed on the property.



# Study the site (Remedial Investigation)

- The **Remedial Investigation (RI)** assessed the site for contaminants of concern.
- Cleanup levels were selected to protect native plants, soil biota, and wildlife.
- Investigations found the following contaminants were present at levels that exceeded standards under the state's cleanup law, MTCA.
  - **Soil:** Total Petroleum Hydrocarbons (TPH), pentachlorophenol, a Semi-volatile Organic Compound, and metals (primarily chromium, copper, and lead)
  - **Groundwater:** None
  - **Surface Water:** None





# Consider the options (Feasibility Study)

The **Feasibility Study (FS)** evaluated three cleanup methods (alternatives) by comparing the costs and environmental benefits.

## Cleanup Alternatives:

- **Alternative 1:** Soil excavation and disposal, institutional controls, monitoring, and maintenance
- **Alternative 2:** Focused excavation and disposal, containment via capping, institutional controls, monitoring, and maintenance
- **Alternative 3:** Containment via capping, institutional controls, monitoring, and maintenance

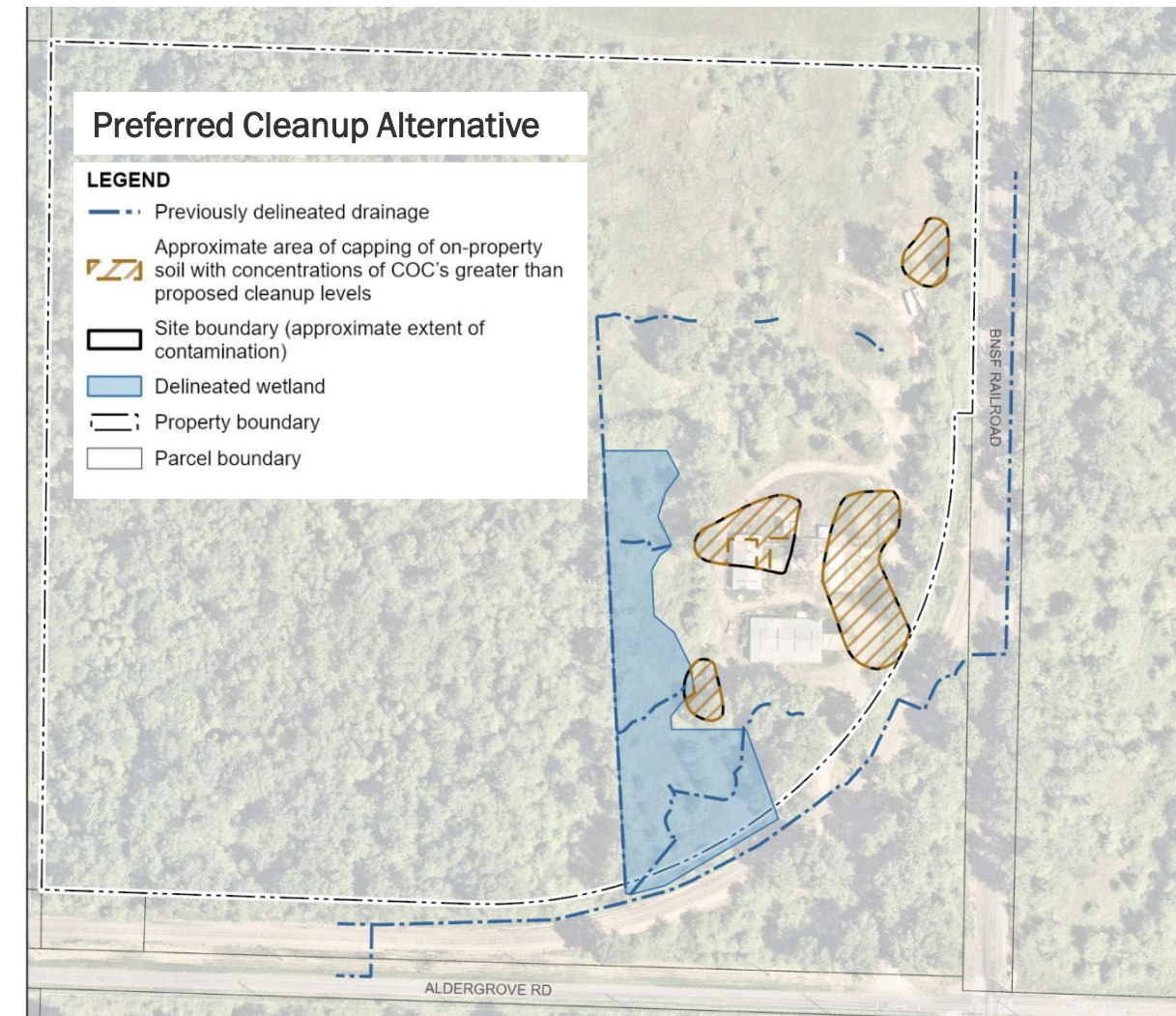
NOTE: The FS assumes that the site will remain vacant over the foreseeable future. If the site is redeveloped, the future landowner will need to evaluate if the selected alternative is protective of the proposed land use.



# Preferred cleanup alternative

The preferred cleanup alternative determined by the FS consists of the following activities:

- **Capping (covering) the contaminated soil** with clean fill and properly compacting it to prevent exposure to people, plants, and animals.
- **Implementing institutional controls** that restrict or prohibit activities that could expose contaminants.
- **Ensuring monitoring and maintenance** to assess the effectiveness of the soil cap.





# Current site challenges

The property is now ~95% cleaned up, with Ecology continuing to address the remaining areas of soil contamination.

However, the property remains unsecured, which has led to ongoing illegal dumping. Unknown hazardous materials brought on-site may pose risks to human health and the environment.



# Review & comment on documents

Ecology invites you to review and comment on the following documents for the Treoil Industries cleanup site.

- **Remedial Investigation:** Details the types and locations of contamination at the site.
- **Feasibility Study:** Explains the different cleanup methods, called alternatives, including Ecology's preferred cleanup alternative.
- **Public Participation Plan:** Describes how Ecology will inform the community about the site activities and ways to become involved.



Access the documents here: <https://go.ecology.wa.gov/Treoil>



# What happens next?



Mar 24-Apr 22, 2025

- Hold the public comment period with an open house event



2025

- Respond to the public comments
- Finalize documents



2025-2027

- Plan the cleanup (Cleanup Action Plan)

# Submit Your Comments

March 24, 2025  
12:00 am

to

April 22, 2025  
11:59 pm



## Comment online:

<https://go.ecology.wa.gov/TreoilComments>

OR



## Contact the Site Manager:

Sunny Becker

PO Box 330316

Shoreline, WA 98133-9716

[Sunny.Becker@ecy.wa.gov](mailto:Sunny.Becker@ecy.wa.gov)



# Watch the video to learn more



RE Sources, a local nonprofit organization, prepared a video about the Trefoil Industries site to support public engagement efforts. Scan the QR code to watch the video now.



*This video was funded by a Public Participation Grant from Ecology.*



# Thank you

**Sunny Becker, Site Manager**

425-457-3842

[Sunny.Becker@ecy.wa.gov](mailto:Sunny.Becker@ecy.wa.gov)

**Kristen Forkeutis, Outreach Specialist**

425-240-4353

[Kristen.Forkeutis@ecy.wa.gov](mailto:Kristen.Forkeutis@ecy.wa.gov)

## Reminder:

A digital PDF of this presentation will be available on Ecology's webpage:

<https://go.ecology.wa.gov/Treoil>