



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office
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February 18, 2026

Phillip Cordell
Senior Environmental Geologist
GeoEngineers, Inc.
5820 South Kelly Avenue, Suite B
Portland, OR 97239
pcordell@geoengineers.com

Re: Sunoco (NuStar) Vancouver Annex Terminal Agreed Order Schedule Revision

- **Site Name:** ST Services NuStar Energy LP (Sunoco (NuStar) Vancouver Annex Terminal)
- **Site Address:** 5420 NW Fruit Valley Road, Vancouver, WA
- **Facility/Site No.:** 61862781
- **Cleanup Site ID No.:** 568

Dear Mr. Cordell:

The Washington State Department of Ecology (Ecology) has reviewed your January 9, 2026 request for an additional extension of the submittal deadlines for the Engineering Design Report (EDR) and the Operations and Maintenance (O&M) Cost Estimate required under Agreed Order No. DE 19602 (Agreed Order) for the Sunoco (NuStar) Vancouver Annex Terminal (Site).

As described in your request, the Agreed Order requires implementation of a Cleanup Action Plan (CAP), including pilot-scale testing to inform final remedy selection. Ecology acknowledges the previously approved schedule extensions associated with pilot studies in the MW-11 and MW-5 Areas and has reviewed the justification provided for this additional request, including seasonal temperature constraints associated with PetroFix® storage and application.

Ecology understands there is good cause to revise the Agreed Order schedule and shall approve a schedule revision with an understanding that this will be the final schedule adjustment required to complete the EDR. The Agreed Order schedule is hereby revised as follows:

Action	Deliverable	Schedule
Prepare Aquifer Testing and Pilot Study Work Plan	Aquifer Testing and Pilot Study Work Plan	45 days following the effective date of the Agreed Order
Complete aquifer testing and pilot studies (if needed)	NA ¹	March 2026
Design cleanup action	Draft Engineering Design Report (EDR)	1 year following completion of pilot testing
Incorporate Ecology comments on EDR and finalize design	Final EDR	45 days following receipt of Ecology comments on the draft EDR
Prepare Soil Management Plan (SMP)	SMP	90 days following the effective date of the Agreed Order
Prepare draft Operations Maintenance and Monitoring Plan (OM&MP)	Draft OM&MP	45 days following Ecology approval of Final EDR
Finalize OM&MP	Final OM&MP	45 days following receipt of Ecology comments on the draft OM&MP
Implement EDR	NA	Within 30 days following Ecology approval of the Final EDR
Submit Draft Construction Completion Report	Draft Construction Completion Report	Within 60 days following Installation of Recirculation System and Injections of Petrofix
Submit Final Construction Completion Report	Final Construction Completion Report	45 days following receipt of Ecology comments on the Draft Construction Completion Report
Submit Draft Environmental Covenant	Draft Environmental Covenant	Within 30 days after receipt of Final Construction Completion Report

Submit Final Environmental Covenant	Final Environmental Covenant	Within 30 days after receipt of Ecology comments on draft EC
Submit Recorded Environmental Covenant	Recorded Environmental Covenant	Within 60 days of the approved final Environmental Covenant

Thank you for your efforts to keep this cleanup project moving forward. You may contact me at 564-669-4866 or thomas.praisewater@ecy.wa.gov with any questions or concerns.

Sincerely,



Thomas Praisewater, PE
Cleanup Project Manager
Toxics Cleanup Program
Southwest Region Office

By certified mail: 9489 0090 0027 6340 1795 18

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Ecology Site File