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STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Northwest Region Office  
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April 20, 2026

Toni DeMayo  
Shell Oil Products US  
SGW Solutions– California  
20495 S. Wilmington Ave.  
Carson, CA 90810  
([toni.demayo@shell.com](mailto:toni.demayo@shell.com))

**Re: EPA Sixth 5 Year Review Findings and PFAS Hazardous Substances Listing,  
Site Name: Shell Harbor Island Terminal, CSID: 5051, FSID: 2030**

Dear Toni DeMayo:

Per the findings in the U.S. Environmental Protection Agency (EPA) Sixth 5-Year Review, the Washington State Department of Ecology (Ecology), in coordination with EPA has identified the potential for a per- and polyfluoroalkyl substances (PFAS) releases that may affect protectiveness at the Harbor Island Tank Farms Operable Unit, part of the Harbor Island Superfund Site, Seattle Washington. During the sixth 5-Year review inspection, EPA and Ecology discovered that Aqueous Film Forming Foam (AFFF) is being stored in holding tanks at the Shell facility located at 2555 13th Ave SW, Seattle Washington. Ecology is therefore requesting that the Harbor Island Tank Farms OU be evaluated for the potential for PFAS releases. It is widely recognized that fire suppression systems with AFFF are a significant source of PFAS releases. Therefore, Ecology is also requesting a historical evaluation of the use of AFFF at the Shell facility.

Ecology proposes a two-step process for evaluation of potential AFFF storage, use, and releases at the Shell facility.

1. **Due Diligence:** A document search to determine if 1) PFAS-containing AFFF has been stored for use in fire suppression systems, 2) any documentation of fire responses, and 3) documentation of potential non-fire releases of AFFF, such as fire training or spills.
2. **Shell Facility Investigations:** Depending on the findings of the Due Diligence evaluation, prepare an investigation work plan and a Sampling and Quality Assurance Project Plan for determination if PFAS-containing substances have impacted groundwater. At this

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time, Ecology is proposing that existing monitoring well networks be utilized for the preliminary investigation. Depending on the findings, future investigations may be requested that include soil borings, monitoring well installation, and associated media sampling. The Sampling and Quality Assurance Project Plan will need to follow EPA QAPP Standard guidance. (<https://www.epa.gov/quality/quality-program-directives>).

Ecology recognizes that emerging contaminants and documentation of other regulatory changes are part of the protectiveness review process and reflect the evolving nature of the environmental regulation process. We appreciate your assistance and efforts to better understand the Shell facility and protect both human health and the environment at the Harbor Island Superfund Site.

Should you have any questions, please do not hesitate to contact me at (425) 324-1438 or [vance.atkins@ecy.wa.gov](mailto:vance.atkins@ecy.wa.gov).

Sincerely,



Vance Atkins  
Site Manager  
Toxics Cleanup Program, NWRO

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