



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 13, 2017

John Robbins
Environmental Program Manager
Shell Oil Products US
Soil and Groundwater FDG
1511 N. Convent 700-293
Bourbonnais, IL 60914

Re: Expectations for Working Together to Clean Up the following Contaminated Site:

- **Site Name:** Chevron 90619
- **Site Address:** 1205 Washington Street, Bellingham, WA 98225
- **Cleanup Site ID:** 8836
- **Facility/Site ID:** 35363194

Dear Mr. Robbins:

I am pleased to welcome you to working with the Department of Ecology's Toxics Cleanup Program. The purpose of this letter is to communicate expectations for working together. Ecology is committed to a clean, healthy, sustainable environment that supports livable communities and a vibrant economy. We expect a collaborative, respectful, realistic, and reasonable approach to addressing the cleanup project. I believe that our working together will result in a timely and efficient process that will address contamination issues at your site. We look forward to a beneficial working relationship.

We understand the need for flexible and collaborative problem solving. Please note that as we work together cleanup decisions will be built upon a legal and scientific foundation.

We look forward to our productive working relationship. Your site is located within our Northwest region. This region is managed by Robert Warren. Your Ecology Cleanup Project Manager (CPM) is Mary O'Herron. The CPM assigned to your site will be your primary point of contact and an active participant in the cleanup project.

Expectations

We have established the enclosed General Standards of Work for managing cleanup projects. We also recognize that each site is unique and that these standards complement the professional judgment required to address cleanup and protect human health and the environment.

At the beginning of the project, the parties involved will negotiate an agreed order or consent decree. Your schedule for submitting key documents will be specified in the order or decree. We expect Potentially Liable Persons (PLPs) and their consultants to work collaboratively with Ecology staff so that technical issues are resolved promptly.

We expect attendance and participation in key project meetings. As described below, project meetings will at a minimum consist of meetings that occur at specific points in the process. These meetings bring together the project team to identify and resolve questions and issues as early as possible.

When working collaboratively and using the processes stated in the order or decree and using the key project meetings, Ecology's goal is to review documents within 45 calendar days of receipt. This will facilitate approval with a single review cycle. If we cannot meet this goal, we will notify you of our expected completion date.

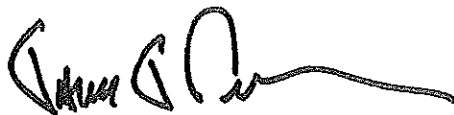
Key Project Meetings

Project meetings will be identified in the project schedule and will precede key deliverables. Project meetings will occur at five specific points in the process. At the kickoff meeting, the Ecology CPM will review who should attend subsequent meetings.

1. **The Cleanup Project Kickoff Meeting** will happen at the start of the project. The purpose is to review site history, set the tone for good communications, identify data gaps, and begin planning for public participation.
2. **The Remedial Investigation Planning Meeting** will happen before the remedial action work plan is submitted for review by Ecology. Topics include data collection, data needs and SEPA requirements.
3. **The Remedial Investigation Pre-Report Check-In** will happen before the remedial investigation report is submitted for review by Ecology. The purpose is to ensure that all parties are clear on the expected contents of the remedial investigation (RI) report.
4. **The Feasibility Study Planning Meeting** may be combined with the third meeting. The purpose is to ensure that all parties are clear on the expected contents of the feasibility study (FS).
5. **The Cleanup Action Plan Meeting** begins before the draft cleanup action plan is prepared. The purpose is to discuss the RI/FS, determine how the remedial action will be selected, review plans for developing the cleanup action plan, and discuss any anticipated institutional controls.

We are committed to working collaboratively using the process described in the TCP General Standards of Work. Our expectation is that this approach will enable a streamlined and effective cleanup process.

Once again, your site has been assigned to the Northwest region managed by Robert Warren. We look forward to working with you to protect Washington's people and environment in a way that improves the quality of life for all of us.

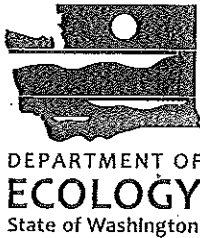


James J. Pendowski, Program Manager
Toxics Cleanup Program

cc: Mary O'Herron, Ecology
Robert Warren, Ecology
Seth Preston, TCP Communications, Ecology
Andy Fitz, Office of the Attorney General

Enclosure: Ecology Toxics Cleanup Program General Standards of Work





Toxics Cleanup Program

General Standards of Work for Formal Cleanup Sites

These General Standards of Work established by the Washington Department of Ecology Toxics Cleanup Program apply to formal cleanup sites where Ecology is the lead agency. Ecology intends that wherever possible the first phase of the cleanup, completing the Remedial Investigation and Feasibility Study (RI/FS), should take no longer than two (2) years. Ecology intends that wherever possible the second phase, completing the Final Cleanup Action Plan, Engineering Design Report, and remedy construction, should take no longer than three (3) years.

Ecology expects that the RI/FS will be conducted under an Agreed Order and the cleanup will be conducted under an Agreed Order or Consent Decree.

Communications

- Ecology and potentially liable persons (PLPs) will together identify stakeholders, local governments, and Tribes and plan for their involvement as appropriate.
- Clear expectations around communications will be established at the start of the project.
- Ecology requires that PLPs select a single point of contact (POC) to lead communications with Ecology. The POC will keep all PLPs informed of site discussions, changes, activities, etc., and will solicit and facilitate input to Ecology.
- Ecology will schedule the following key project meetings at specific points during the project (identified in the Scope of Work). Meeting checklists will be used by the Ecology Cleanup Project Manager (CPM) for creating agendas.
 - Cleanup Project Kickoff Meeting.
 - Remedial Investigation Planning Meeting.
 - Remedial Investigation Pre-Report Check-In.
 - Feasibility Study Planning Meeting.
 - Cleanup Action Plan Meeting.

Project Documents

- The Ecology CPM will review key documents (RI Work Plan; RI/FS Report; etc.) within 45 days of receipt.
- Key documents will be reviewed by Ecology for:
 - Technical accuracy, objectivity, completeness, and clarity.
 - Compliance with the order or decree, MTCA, and other applicable regulations.
- Once tasks required by the Agreed Order are complete, Ecology will issue a letter documenting that requirements of the Agreed Order have been satisfied.

Data Collection

- As time allows and during significant events, the Ecology CPM will participate in field activities so that decisions are made in real time, with observations and discussion through the POC.
- Where appropriate, expedited site assessment techniques should be used to characterize the nature and extent of contamination (for example, source areas and down-gradient plume boundaries).

This includes:

- Existing information from previous site investigations; other nearby sites; and regional soil, geologic, and groundwater studies.
 - Field screening instruments (where possible).
 - Direct-push technology to sample soil and groundwater (as geologic conditions permit).
 - On-site mobile laboratories or off-site fast-turnaround analyses.
- Frequent and regular data reports will facilitate approval of key project documents (the RI Work Plan, RI/FS Report, etc.) after a single review cycle.
- Data reports should be informal, containing only information necessary for effective discussions between Ecology and the PLP/consultants. Include:
- Figures showing sampling locations and currently known character and extent of contamination.
 - Field observations.
 - Laboratory sheets.
 - Tables of analytical results.
- Discuss data interpretations with Ecology as data sets are completed to facilitate mutual understanding of site conditions and data gaps.
- PLPs are required to submit sampling data into Ecology's Environmental Information Management (EIM) system. This should occur as soon as the data has been validated and accepted by Ecology and before key documents are submitted. Ecology data coordinators will assist as needed.

Remedial Action Grants

- For those projects where state funding is available and will help expedite the process, Ecology will provide Remedial Action Grant Guidelines and application instructions. An Ecology Grant Manager will be available to clarify eligible costs and answer questions.
- At the start of the project, the PLPs, contractors, and Ecology will discuss what can be completed during the current biennium. Estimates of funding needs and a schedule for phased expenditures should be reviewed at key project meetings.

Keeping the Project Moving

- Look for activities where the RI and FS work can be performed concurrently.
- Delays or problems in getting permits should be communicated promptly; Ecology may be able to assist in moving the permit process forward.
- Disagreements about technical matters (site characterization) or financial matters (cost recovery) will be resolved through discussions:
- A meeting will occur within 10 days of being requested by Ecology or the PLPs.
 - If no agreement is reached within 10 days following the meeting, the dispute resolution provisions of the Agreed Order will be followed.
- A new Ecology CPM assigned to a site will take no longer than fifteen (15) working days for the transition. Previously approved and agreed-upon work plans, schedules, reports, and protocols will remain.
- At the end of the RI/FS there will be a debriefing meeting to discuss what went well, what could have gone better, and to acknowledge completion of this phase of project work.