



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

March 13, 2019

Ed Ralston  
Phillips 76 Company  
76 Broadway  
Sacramento, CA 95818

**Re: VCP Application for the following Site:**

- **Site Name:** Unocal Bulk Plant 0046
- **Site Address:** 217 E Steuben St, Bingen
- **Cleanup Site ID:** 6383
- **Facility/Site ID:** 61834259

Dear Ed Ralston:

The Department of Ecology (Ecology) received your Voluntary Cleanup Program (VCP) application for the Unocal Bulk Plant 0046 facility (Site) on March 6, 2019. Although the VCP application package did not include an Agency Determination Checklist and is therefore incomplete, Ecology was able to evaluate your application for acceptance into the VCP.

We applaud your initiative and appreciate your interest in the VCP. However, we have decided not to accept your application.

**Reason**

We did not accept your application because the Site is too complex to be managed under the VCP, which is designed for simpler sites and more routine cleanups. When making this determination, Ecology considered several factors, including whether the Site involves:

- Significant or immediate threats to human health or the environment.
- Multiple releases that have commingled.
- Media other than soil or groundwater.
- Multiple parcels of real property.
- Unreasonable restoration timeframes.
- Significant public interests.



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This Site is too complex because it involves potential surface water impacts and co-mingled groundwater contamination with nearby cleanup sites.

Instead, we have decided to supervise the cleanup of the Site under an order or decree.

### **Next Steps**

Based on this decision, we may take one or more of the following steps:

1. Identify those persons we find potentially liable for cleanup of the Site.
2. Initiate discussions for an agreed order or consent decree that will govern further action at the Site.

If you have any questions about our decision or next steps, please contact me at 509-454-7886 or [valerie.bound@ecy.wa.gov](mailto:valerie.bound@ecy.wa.gov).

Sincerely,



Valerie Bound  
VCP Section Manager  
Toxics Cleanup Program  
Central Regional Office

cc: Matthew Davis, GHD Services  
Garwood R K Co., Inc.