



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000  
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July 18, 2019

John Robbins  
Environmental Program Manager  
Shell Oil Products US  
20945 S. Wilmington Avenue  
Carson, CA 90810

**Re: Termination of various VCP Projects from the former Shell Multi Site Agreement—AECOM Sites**

Dear John Robbins:

We received AECOM's letters on your behalf responding to our request for information on the status of the 28 Voluntary Cleanup Program (VCP) sites that were formerly enrolled in the Shell Multi Site Agreement (MSA). Of the 28 sites on the list, seven sites were managed by a different consultant and discussed under separate cover. The remaining 21 sites are the focus of this letter. Of the 21 sites managed by AECOM:

- We did not received any response for four sites.
- We received response from Renee Knecht for 11 sites.
- We received response from Mike Edwards for three sites.
- We received response from Demetrio Cabanillas for three sites.

The responses provided by AECOM personnel on your behalf did not provide a the detailed Cleanup Project Status or Work Plan and a detailed cleanup schedule we asked for in our March 2019 letter. Based on these responses, we have decided to terminate all 21 AECOM-managed sites. These sites are:

ISIS Site Name	VCP		Site Address	City	AECOM
	Number	FS ID			Site Manager
Texaco Wallingford	NW2023	4465692	118 NE 45th St	Seattle	Cabanillas
Shell Station 121083	NW2026	80616298	3100 E Madison St	Seattle	Knecht
Shell Station 120441	NW2029	51994197	1013 NE 45th St	Seattle	Knecht
Texaco Station 632320366	NW2030	59579759	511 S Dearborn St	Seattle	Unknown
Shell Station 120877	NW2033	14577491	210 NE 45th St	Seattle	Knecht

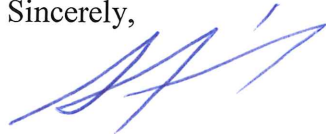


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<b>ISIS Site Name</b>	<b>VCP Number</b>	<b>FS ID</b>	<b>Site Address</b>	<b>City</b>	<b>AECOM Site Manager</b>
Texaco 120848	NW2034	13589449	201 128th St SW	Everett	Knecht
Shell 119519	NW2035	56326712	2921 Martin Luther King Jr Way	Seattle	Knecht
Texaco Station 632320049	NW2036	32794934	5500 15th Ave NW	Seattle	Knecht
Texaco 121287	NW2037	94485958	4605 Freemont Ave N	Seattle	Edwards
Sunmart 1	NW2041	35888116	21449 Pacific Hwy S	Des Moines	Edwards
Snohomish Co Used Oil Collect	NW2044	5195417	11020 19th Ave SE	Everett	Knecht
Shell Station 120531	NW2053	63265631	11700 NE 160th	Bothell	Unknown
Texaco Station 630760004	NW2059	10339322	21049 Cedardale Rd	Mount Vernon	Knecht
Shell Station 120463	NW2064	64432537	105 S 156th St	Seattle	Unknown
Shell Station 120698	NW2068	7546643	1520 S 348th St	Federal Way	Unknown
Minit Lube 1110	NW2079	41675877	4902 25th Ave NE	Seattle	Cabanillas
Midway Texaco	NW2082	51216788	23031 Pacific Hwy S	Des Moines	Edwards
Silver Lake Convenience Store	NW2086	16329343	1816 112th Ave SE	Everett	Cabanillas
Shell Oil Products SAP 121693	NW2091	64651921	9796 Holman Rd NW	Seattle	Knecht
Texaco Station 121522	NW2094	51218997	7200 Aurora Ave N	Seattle	Knecht
Wedgewood Shell	NW2517	77346879	7347 35th Ave NE	Seattle	Knecht

Termination letters for these sites are attached. If you have any questions about these terminations, please contact me at (425) 649-7233 or by email at [sofe461@ecy.wa.com](mailto:sofe461@ecy.wa.com).

Sincerely,



Sonia Fernandez  
VCP Coordinator  
Toxics Cleanup Program, NWRO

By certified mail [9171 9690 0935 0106 7148 77](tel:9171969009350106714877)

cc: Renee Knecht, AECOM (email)  
Mike Edwards, AECOM (email)  
Demetrio Cabanillas, AECOM (email)



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John Robbins  
Environmental Program Manager  
Shell Oil Products US  
20945 S. Wilmington Avenue  
Carson CA 90810

**Re: Termination of VCP Agreement for the following Site:**

- **Site Name:** Shell 120877
- **Site Address:** 210 NE 45th Street, Seattle, Washington 98105
- **Facility/Site No.:** 14577491
- **Cleanup Site ID:** 5569
- **VCP Project No.:** NW2033

Dear John Robbins:

The Department of Ecology (Ecology) is terminating the VCP Agreement governing Project No. **NW2033**. The project involved the cleanup of the Shell 120877 facility (Site). The effective date of termination is the date of this letter. We are providing this notice in accordance with the terms of the Agreement.

**Reason**

Ecology is terminating the Agreement because you have not asked for any opinion from us since March 31, 2010. A Status Request letter was sent to you with copy to your consultant on March 29, 2019. Ecology received your response for this specific Site on May 3, 2019.

To be in VCP, Ecology requires that VCP sites are actively conducting remedial actions and requesting an opinion on current or planned work. In your response letter, you indicated that additional subsurface investigations were conducted and reports were submitted to Ecology in 2014 and 2015. However, an opinion was not requested from Ecology for any of these reports. In addition, although we understand that you are still actively monitoring groundwater conditions at the Site, groundwater monitoring alone is not considered by Ecology to be a remedial activity. Lastly, Ecology also requires that a schedule of planned cleanup milestones is submitted for sites in the VCP and this was not submitted. For these reasons, Ecology is not able to keep this site in the VCP at this time.

If you decide to request an opinion on your cleanup efforts or wish to ask for assistance for this Site, you can apply [to the Pollution Liability Insurance Agency \(PLIA\) Petroleum Technical](#)



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[Assistance Program \(PTAP\)](#) when more remedial activities have occurred or a request for opinion is needed.

### **Next Steps**

Based on this decision, Ecology may take the following step:

1. Conduct a site hazard assessment (SHA) and rank the Site for further action.

### **Contact Information**

Ecology is committed to working with you to accomplish the prompt and effective cleanup of the Site. If you have any questions about this notice, please contact me at (425) 649-7209.

Sincerely,



Louise Bardy  
VCP Unit Manager  
Toxics Cleanup Program, NWRO

cc: Renee Knecht, AECOM (e-mail)  
Sonia Fernández, Ecology VCP Coordinator (email)