

# Treoil Industries Cleanup Site



Treoil Industries site detail, 2024

## Comments accepted

March 24, 12:00 a.m. –  
April 22, 11:59 p.m., 2025

## Submit comments

### Online:

<https://go.ecology.wa.gov/Treoil>

### By mail or email:

Sunny Becker, Site Manager  
WA Department of Ecology  
PO Box 330316  
Shoreline, WA 98133-9716  
425-457-3842  
[Sunny.Becker@ecy.wa.gov](mailto:Sunny.Becker@ecy.wa.gov)

## Document review

<https://go.ecology.wa.gov/TreoilComments>

Ferndale Public Library  
2125 Main Street  
Ferndale, WA 98248

## Site info

Facility Site ID: 2919  
Site Cleanup ID: 950

## Public Outreach Contact

For assistance, reach out to:  
Kristen Forkeutis,  
Outreach Specialist  
[Kristen.Forkeutis@ecy.wa.gov](mailto:Kristen.Forkeutis@ecy.wa.gov)  
425-240-4353

## Documents ready for public review and comment

The Department of Ecology (Ecology) invites you to comment on documents for the Treoil Industries cleanup site located at 4242 Aldergrove Road in unincorporated Whatcom County. The site is located northwest of Ferndale and south of Blaine, approximately two miles east of the Strait of Georgia and four miles northwest of the Lummi Indian Reservation.

The following documents are available:

- **Remedial Investigation:** Details the types and locations of contamination at the site.
- **Feasibility Study:** Explains the different cleanup methods, called alternatives, including Ecology’s preferred cleanup alternative.
- **Public Participation Plan:** Describes how Ecology will inform the community about the site activities and ways to become involved.

## Join our open house—in-person or online!

Drop in during this two-hour open house to learn more about this cleanup site. Phone interpretation in Spanish, Russian, Ukrainian, Arabic, and Punjabi will be available for in-person attendees.

**Wednesday, April 2, 2025**

4:00 pm-6:00 pm

**In-person option: Ferndale Public Library**

2125 Main Street, Ferndale  
*Snacks will be provided!*

**Online option: Zoom Virtual Meeting**

Register: <https://go.ecology.wa.gov/Treoil>



Scan for more info

**Language information, see page 7**

## Site background

The site is part of a 34-acre property owned by Jagroop S. Gill and Campbell Land Corporation. A 3.5-acre section of the property has been used since the 1980s for numerous industrial operations. This primarily included processing tall oil, a byproduct of kraft paper production. Biodiesel production and other small-scale industrial operations also took place. Over the decades, the property accumulated a large amount of dangerous wastes — toxic, corrosive, ignitable, or reactive substances — that were left unsecured and often improperly stored.

## History of Environmental Investigations & Enforcement

**1989–2016:** Starting in 1989 a record of spills and poor maintenance operations began at the site. This prompted Ecology’s Water Quality Program, Ecology’s Hazardous Waste and Toxics Reduction Program, and Whatcom County Health and Community Services to perform site inspections and assessments. During this period, the property was placed on Ecology’s Contaminated Site List for confirmed contamination and was referred to as the Treoil Industries site. Ecology issued a legal administrative order in 2015, requiring them to properly identify, manage, and dispose of the waste.



Treoil Industries site,  
March 2017 before the EPA cleanup



Treoil Industries site,  
March 2017 before the EPA cleanup

**2017:** Ecology determined that the site did not meet the requirements of the administrative order. The dangerous waste storage conditions had deteriorated, causing risks to human health and the environment. At Ecology’s request, the Environmental Protection Agency (EPA) deployed an emergency response team, which removed:

- 93,000 gallons of liquid tall oil and tall oil derivative wastes
- 275 tons of contaminated soil, sludge and debris
- 6,750 gallons of crude glycerin
- 430 containers, 35 drums and nine cylinders of hazardous chemicals
- Eight cubic yards of asbestos containing material

Some areas of the site remained a concern, with spill protection measures added where possible.

**2022:** Ecology inspectors obtained court-ordered access to the site and found conditions were similar to or worse than before the 2017 cleanup. The EPA conducted a second action, which removed:

- 97,400 gallons of oily liquid from secondary containment
- 18,000 gallons of hazardous liquids
- 3,316 tons of solidified material
- 4,800 gallons of pumpable oily material
- 1,890 gallons of corrosive liquids
- Eight cubic yards of solidified hazardous materials

The EPA also demolished multiple large above-ground storage tanks, containment areas, and other structures that were being illegally used to store dangerous waste.

In addition, Whatcom County Health and Community Services removed old cars that were dumped on the site.

The 2017 and 2022 cleanup actions cost a total of approximately \$4.3 million.



Treoil Industries site,  
May 2022 before the EPA cleanup



Treoil Industries site, 2024



Treoil Industries site, 2024

### **2023–2024:**

- Ecology issued a \$900,000 penalty to Jagroop S. Gill, Campbell Land Corp., at the Treoil Industries site for failure to comply with WA's dangerous waste laws.
- Ecology's Toxics Cleanup Program finalized a contract with consulting firm Haley & Aldrich (HA) to begin the formal cleanup process under the Model Toxics Control Act (MTCA – see page six).
- HA began to study the site (remedial investigation) and consider cleanup options (feasibility study).
- As of December 2024, additional abandoned vehicles, garbage, debris, and other signs of illegal use have been observed on the property.

## Study the site (Remedial Investigation)

Beginning in 2023, HA executed the Remedial Investigation (RI) to assess the site for contaminants of concern. Clean up levels were selected to protect native plants, soil biota, and wildlife. The RI focused on investigating soil, groundwater, and surface water at the site to understand the types and locations of contamination. Investigations found the following contaminants were present at levels that exceeded standards under the state’s cleanup law, MTCA (see page six).

- **Soil:** Total Petroleum Hydrocarbons (TPH), pentachlorophenol, a Semi-volatile Organic Compound, and metals (primarily chromium, copper, and lead)
- **Groundwater:** None
- **Surface Water:** None

## Consider the options (Feasibility Study)

To address the contamination found at the site, HA prepared a Feasibility Study (FS), which evaluated three different cleanup methods (alternatives). The costs and environmental benefits of the alternatives were then compared, leading to a preferred cleanup alternative. The FS assumes that the site will remain vacant over the foreseeable future. If the site is redeveloped, the future landowner will need to evaluate if the selected alternative is protective of the proposed land use.



Treoil Industries site, 2024

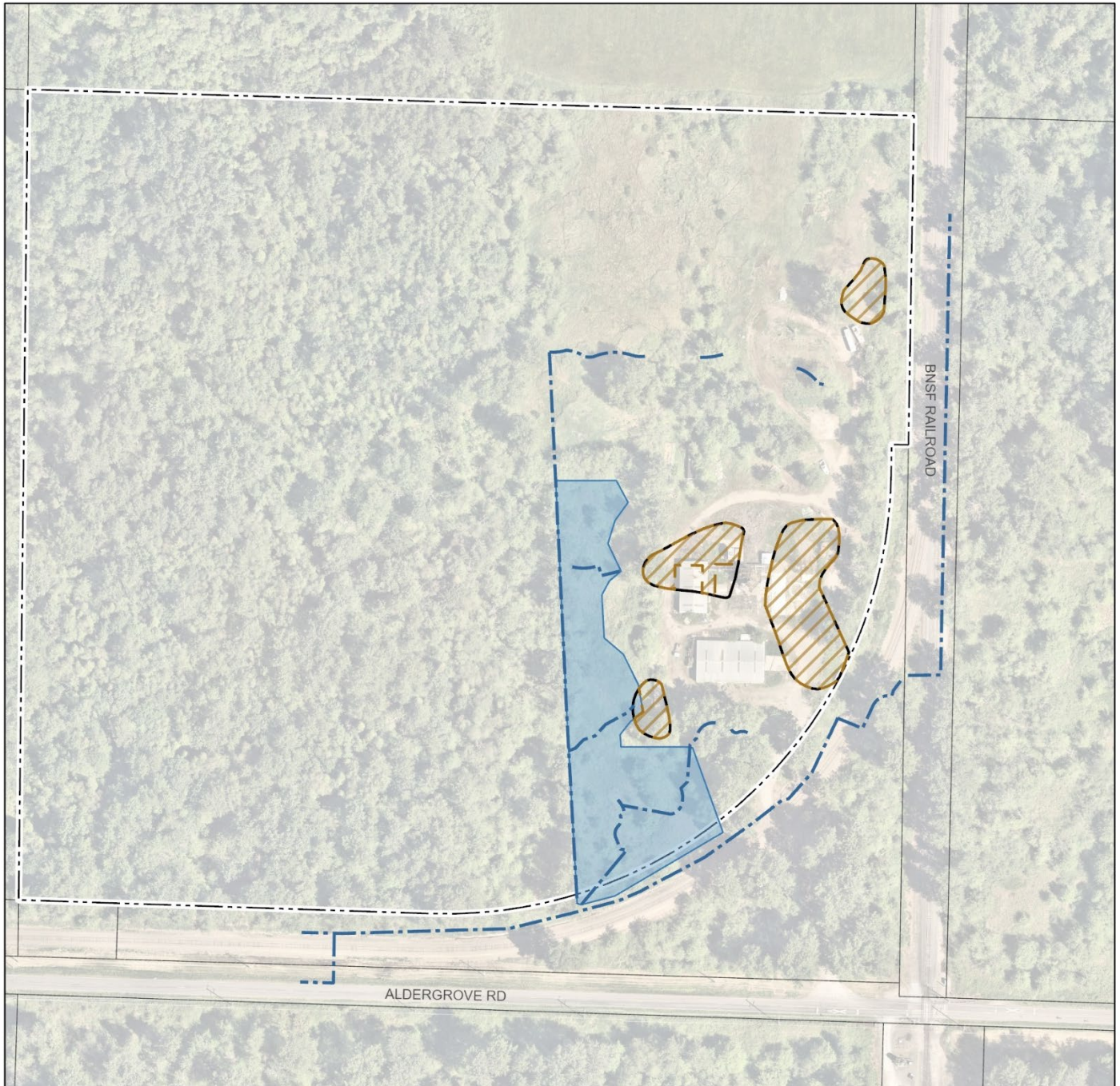
### Cleanup alternatives:

- **Alternative 1:** Soil excavation and disposal, institutional controls, monitoring, and maintenance
- **Alternative 2:** Focused excavation and disposal, containment via capping, institutional controls, monitoring, and maintenance
- **Alternative 3:** Containment via capping, institutional controls, monitoring, and maintenance

### Preferred Cleanup Alternative: Alternative 3

Alternative 3 consists of the following activities explained in more detail:

- **Containment via capping:** Approximately 6,268 tons of contaminated soil will be capped (covered) with clean fill and properly compacted to prevent exposure to people, plants, and animals. The cap will have low permeability to ensure stormwater will run off beyond it.
- **Institutional controls:** Legal or administrative measures will be put in place to restrict or prohibit activities that could result in exposure to contaminants that are above acceptable health risk levels or interfere with the integrity of the cleanup action.
- **Monitoring and maintenance:** A long-term monitoring plan will be implemented to assess the integrity and effectiveness of the cap. Maintenance of the cap will be conducted as necessary.

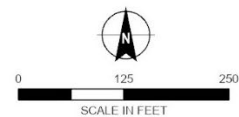


**LEGEND**

- Previously delineated drainage
- Approximate area of capping of on-property soil with concentrations of COC's greater than proposed cleanup levels
- Site boundary (approximate extent of contamination)
- Delineated wetland
- Property boundary
- Parcel boundary

**NOTES**

1. All locations and dimensions are approximate.
2. COC = Chemical of Concern
3. Parcel data source: Whatcom County
4. Aerial imagery source: Nearmap, 10 May 2024



**HALEY ALDRICH**

TREOIL INDUSTRIES SITE  
FERNDALE, WASHINGTON

CLEANUP ACTION ALTERNATIVE 3

FEBRUARY 2025

Preferred cleanup alternative 3

## Other challenges

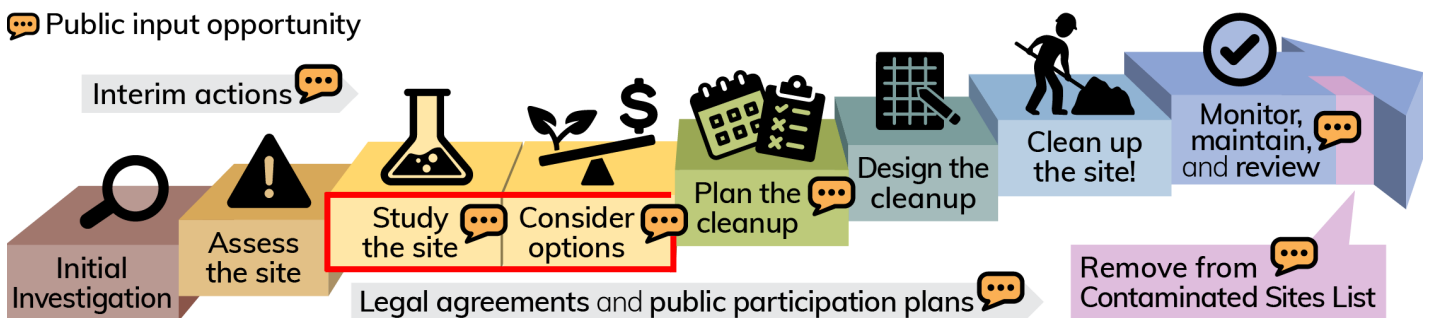
While the tall oil processing plant has been inactive since the 1990s, the property remains unsecured. This has led to ongoing illegal dumping. Unknown hazardous materials brought on site may pose risks to human health and the environment.

## What happens next?

Ecology will consider all comments received during this public comment period and may make changes to the documents. If the documents require significant changes, we will hold another public comment period. If no significant changes are made, Ecology will finalize the documents. The draft cleanup action plan will be available for review during a future public comment period.

## Ecology’s cleanup process

The [Model Toxics Control Act \(MTCA\)](https://ecology.wa.gov/mtca)<sup>1</sup> is Washington’s environmental cleanup law. It provides requirements for contaminated site cleanup and sets standards that protect human health and the environment. Ecology is responsible for administering MTCA, including the oversight or management of cleanups. The [MTCA cleanup process](https://ecology.wa.gov/mtca-process)<sup>2</sup> is completed in steps (see graphic below) over a variable timeline. The Treoil Industries site is currently in the “study the site” and “consider options” steps of the process, outlined in red below.



Washington’s cleanup process

<sup>1</sup> <https://ecology.wa.gov/mtca>

<sup>2</sup> <https://ecology.wa.gov/mtca-process>

## Language information

### Español

Le ofrecemos servicios de traducción e interpretación sin costo. Para solicitar una copia de esta información en español, llame a Kristen Forkeutis al 425-240-4353 o envíe un correo electrónico a [kristen.forkeutis@ecy.wa.gov](mailto:kristen.forkeutis@ecy.wa.gov). Si necesita servicios de interpretación, solicite un intérprete y permanezca en la línea mientras lo comunicamos.

### Русский

Мы предлагаем бесплатные услуги письменного и устного перевода. Чтобы запросить копию этой информации на нужном вам языке русский, позвоните Kristen Forkeutis на номер 425-240-4353 или напишите на адрес [kristen.forkeutis@ecy.wa.gov](mailto:kristen.forkeutis@ecy.wa.gov). В случае звонка для запроса услуг устного переводчика попросите о соответствующих услугах и оставайтесь на линии, пока мы вас соединим.

### Українська

Ми пропонуємо безкоштовні послуги письмового й усного перекладу. Щоб подати запит на отримання копії цієї інформації потрібною мовою українська, зателефонуйте Kristen Forkeutis на номер 425-240-4353 або напишіть на адресу [kristen.forkeutis@ecy.wa.gov](mailto:kristen.forkeutis@ecy.wa.gov). У разі дзвінка для запиту на отримання послуг усного перекладача попросіть про відповідні послуги та залишайтеся на лінії, поки ми вас з'єднаємо.

### العربية

قَدِّمَ لكَ خدمات الترجمة التحريرية والشفوية مجاناً. لطلب الحصول على نسخة من هذه المعلومات في العربية، تواصل مع Kristen Forkeutis على الرقم 425-240-4353 أو أرسل رسالة بريد إلكتروني إلى [kristen.forkeutis@ecy.wa.gov](mailto:kristen.forkeutis@ecy.wa.gov). إذا كنت تتصل للحصول على خدمات الترجمة الشفوية، فيرجى طلب مترجم والانتظار بينما نقوم بتوصيلك به.

### ਪੰਜਾਬੀ

ਅਸੀਂ ਤੁਹਾਨੂੰ ਮੁਫਤ ਅਨੁਵਾਦ ਅਤੇ ਦੁਭਾਸ਼ੀਕਰਨ ਸੇਵਾਵਾਂ ਪ੍ਰਦਾਨ ਕਰਦੇ ਹਾਂ। ਪੰਜਾਬੀ ਵਿੱਚ ਇਸ ਜਾਣਕਾਰੀ ਦੀ ਇੱਕ ਕਾਪੀ ਦੀ ਬੇਨਤੀ ਕਰਨ ਵਾਸਤੇ, Kristen Forkeutis ਨੂੰ 425-240-4353 'ਤੇ ਕਾਲ ਜਾਂ [kristen.forkeutis@ecy.wa.gov](mailto:kristen.forkeutis@ecy.wa.gov) 'ਤੇ ਈਮੇਲ ਕਰੋ। ਜੇਕਰ ਦੁਭਾਸ਼ੀਆ ਸੇਵਾਵਾਂ ਲਈ ਕਾਲ ਕਰ ਰਹੇ ਹੋ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਇੱਕ ਦੁਭਾਸ਼ੀਏ ਦੀ ਮੰਗ ਕਰੋ ਅਤੇ ਜਦੋਂ ਤੱਕ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਨੈਕਟ ਕਰਦੇ ਹਾਂ ਲਾਈਨ 'ਤੇ ਰਹੋ।

Toxics Cleanup Program  
PO Box 330316  
Shoreline, WA 98133-9716

# Treoil Industries Cleanup Site

## Documents ready for public review

Español | Русский | Українська | العربية | ਪੰਜਾਬੀ

## Public comment period

March 24, 12:00 a.m. – April 22, 11:59 p.m., 2025

<https://go.ecology.wa.gov/Treoil>

## Open house

Wednesday, April 2, 2025; 4:00 p.m. – 6:00 p.m.

<https://go.ecology.wa.gov/Treoil>

See page 1 for details.

## ADA accessibility

To request an ADA accommodation, contact Ecology by phone at 425-240-4353 or email at [kristen.forkeutis@ecy.wa.gov](mailto:kristen.forkeutis@ecy.wa.gov), or visit [ecology.wa.gov/Accessibility](https://ecology.wa.gov/Accessibility). For Relay Service or TTY call 711 or 877-833-6341.



Treoil Industries site location