

From: Mark Wells DWells@ppcla.com
Subject: Point Wells - Press Interview with Noah Haglund of The Herald
Date: April 21, 2011 at 10:23 AM
To: "South, David (ECY)" /O=WA.GOV/OU=ECY/CN=RECIPIENTS/CN=DSOU461
Cc: Warren,Bob(ECY) , SteveFarkas , SteveHoffman(steven.hoffman@hartcrowser.com) , JuneChristman , RodBrown

David,

I understand what you are saying. It is just that the word "decades" can mean 10, 20, 30, 40, years.

Maybe you can say "several" or "many" years.

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From: South, David (ECY) [mailto:DSOU461@ECY.WA.GOV]
Sent: Thursday, April 21, 2011 10:12 AM
To: Mark Wells
Cc: Warren, Bob (ECY)
Subject: RE: Point Wells - Press Interview with Noah Haglund of The Herald

Thank you, Mark. I will incorporate the information.

With regard to your suggested change:

We have emphasized that cleanup of complex petroleum sites such as Point Wells can take years , even decades [PLEASE DELETE THIS REFERENCE TO DECADES], and that BSRE Point Wells should consider this when considering their schedule.

I may or may not say something like this. We started at Unocal Edmonds in 1993 and still have several years of work to do. So, it is an accurate statement. Whether cleanup of Point Wells will take decades is to be determined.

Again, I recommend you have a serious discussion internally about the role of Ecology 's Toxic Cleanup Program in your plans and what schedule considerations you have. From my point of view as engineering staff and the resource availability I see currently, I believe you should be concerned about

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whether cleanup will turn out to be the critical path item on your project and the impact of the time it will take for Ecology involvement on your desired schedule. Again, strictly the view from down in the trenches.

From: Mark Wells [mailto:DWells@ppcla.com]
Sent: Thursday, April 21, 2011 10:04 AM
To: South, David (ECY)
Cc: Warren, Bob (ECY); 'Steve Hoffman (steven.hoffman@hartcrowser.com)'; June Christman; Steve Farkas ; 'Rod Brown'
Subject: RE: Point Wells - Press Interview with Noah Haglund of The Herald

David,

Please see our comments below in red. Thank you for running this by us.

Mark

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From: South, David (ECY) [mailto:DSOU461@ECY.WA.GOV]
Sent: Tuesday, April 19, 2011 4:32 PM
To: Mark Wells
Cc: Warren, Bob (ECY)
Subject: Point Wells - Press Interview with Noah Haglund of The Herald

Mark,

As you may remember, Noah Haglund of The Herald, Everett 's newspaper, asked to talk to us about the Point Wells site. Larry Altose, our Press Information Officer, and I will be talking to him Friday.

I have prepared some notes that address questions I anticipate he may answer. I would appreciate it if you would please take a look at them and send me any corrections. More detail on what Paramount is doing also would be useful.

In addition, the last few notes summarize Ecology 's current thinking regarding the site. We wanted to share this with you in advance of the interview.

Finally, I will recommend he contact you if he has questions about the site I cannot

answer. What contact information should I give him? Or is there someone else I should recommend?

And on a housekeeping note, I seem to have you in my address book under both mwells@ppcla.com and Dwells@ppcla.com. Please let me know which one I should be using or if one is correct.

Thanks.

· The site was first occupied by a cooperage. In 1909 Point Wells became a ship-building site. An asphalt factory was built on the site in 1902. Shell Oil purchased the site in 1911 and developed it as a petroleum transfer site. Standard Oil Company purchased the site in the mid-1930s. Chevron purchased the facility and property in 1950. Paramount Petroleum purchased the site in 2005. Recently Paramount has transferred the site to BSRE Point Wells, LLC. BSRE Point Wells is a real estate development company and is part of the Alon Group, as is Paramount .
[REVISE PER YESTERDAY 'S EMAIL]

· Spillage occurred over the years. Chevron installed a groundwater pump and treat system in 1998. Paramount continues to operate the system. Contaminated water is pumped to a water treatment system where the contamination is removed. The water is then discharged to Puget Sound under National Pollution Discharge Elimination System Permit WA-003170. The Permits sets limits for flow, pH, benzene, and petroleum.

· Point Wells is a contaminated site. It is listed in Ecology 's Integrated Site Information System database as Paramount of Washington, Facility ID 2706. Snohomish County conducted a site hazard assessment in 1998. The site ranked a 3, where 1 represents the highest relative risk and 5 the lowest. The SHA found the site did not pose a risk to upgradient water supplies.

· Paramount continues to conduct cleanup actions independently. It is Ecology 's understanding there are about **APPROXIMATELY 175 GROUNDWATER MONITORING WELLS AND 10** wells included in the pump and treat system for the site.

· Our understanding is that BSRE Point Wells is pursuing plans to place an Urban Center on the site, to be constructed in four major phases over about 15 to 20 years.

· Ecology is not formally involved in the site at present. Ecology has met with Paramount a couple of times to discuss their plans for the site. We believe BSRE Point Wells may ultimately want formal Ecology oversight of the cleanup under an Agreed Order or Consent Decree. This may be an important consideration in the salability of their development. **[WE BELIEVE THAT WE ARE FORMALLY INVOLVED WITH ECOLOGY UNDER OUR NPDES PROGRAM. AS A REQUIREMENT OF OUR NPDES PERMIT, WE SUBMIT ANNUAL “REMEDICATION SYSTEM OPERATING STATUS AND GROUNDWATER QUALITY EVALUATION” REPORTS TO ECOLOGY.]**

· We have emphasized that cleanup of complex petroleum sites such as Point Wells can take years ,even decades **[PLEASE DELETE THIS REFERENCE TO DECADES]**, and that BSRE Point Wells should consider this when considering their schedule.

· At present, Ecology is letting Paramount and BSRE Point Wells continue with their independent cleanup and leaving the decision of whether and when to seek formal Ecology oversight up to them. We have apprised them that the formal process will take significant time and effort.

· If and when Ecology becomes involved, we anticipate entering into an Agreed Order to perform a Remedial Investigation/Feasibility Study. The first step in this study would be to draw together existing information, develop a conceptual site model, and consider potential cleanup actions. This information would be used to develop a data gaps report and remedial investigation work plan, and then to implement the remedial investigation work plan. It is not uncommon for investigations to be phased. The information developed in the remedial investigation work plan would be used to develop several approaches to cleaning up the site. Ecology would then select a remedy from this information and prepare a cleanup action plan for the site. The cleanup action plan would be implemented under either an Agreed Order or a Consent Decree.

· If the cleanup schedule must be integrated with the real estate development schedule it will take considerable planning.

· Public involvement is a key part of cleanup under Ecology 's formal process. Public comment periods and meetings would be held at key points in the process.

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