

Countryman, Ryan

From: Tom McCormick <tommccormick@mac.com>
Sent: Thursday, August 18, 2016 3:00 PM
To: Countryman, Ryan
Cc: Tom Mailhot; Gretchen Brunner
Subject: Point Wells: 2045 and Ecology

Ryan,

In emails I sent earlier this year, I argued that the assumed full buildout date for Point Wells should be 2045, not 2035. Setting a realistic full buildout date is important for numerous reasons: the impact on traffic assumptions, the fiscal analysis, determining the ordinary high water mark, etc.

I remain puzzled as to why the DEIS apparently will not address the cleanup of the site, as the cleanup is one of the most important factors that will affect the full buildout date. This is especially true if, as we believe, the entire site must be cleaned up before any construction begins, as opposed to cleaning up phase by phase.

Reaching an agreement regarding the process for site cleanup could take five or more years. And the actual cleanup of the site could take decades (see the attached email from David South to Mark Wells).

At a minimum, before prescribing an assumed buildout date in the DEIS, there needs to be a detailed analysis and study of (1) how long it will take to reach an agreement regarding the process for site cleanup (e.g., 5 or more years), and (2) how long it will take to remove all the oil tanks and equipment and clean up the site, including any required confidence resting period between site cleanup and construction commencement (e.g., 5 - 20 years).

It may well be that 2045 is an overly optimistic full buildout date. It may be that the date should be 2050 or later.

Thank you.

Tom McCormick

PS: By separate email, I'll be forwarding you a Jan. 14, 2014 letter from Rodney L. Brown, Jr. of Cascade Law Group, representing Paramount Petroleum Corporation, to Ecology's David South, requesting an Agreed Order

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From: South, David (ECY)

Date: Apr 21, 2011, 10:11 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 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.