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June 24, 2021

Timothy L. Bishop
Chevron Environmental Management Company (CEMC)
6001 Bollinger Canyon Road
San Ramon, CA 94583
timbishop@chevron.com

Re: Comments on Draft Revised Feasibility Study Report.

- **Site Name:** Cowlitz Food & Fuel (Also known as Former Texaco Service No. 211556)
- **Site Address:** 101 Mulford Road, Toledo, Lewis County, WA 98591
- **Agreed Order:** DE 5236
- **Facility/Site No.:** 1166
- **Cleanup Site ID No.:** 7025

Dear Timothy L. Bishop:

The Washington State Department of Ecology (Ecology) has reviewed the revised Feasibility Study (FS) Report (Report)¹ that you prepared in response to our August 18, 2020, comment letter.² **Ecology has several significant concerns that need to be addressed before Ecology can approve the Report:**

1. Ecology's comment #4 in our August 18, 2020, letter is a critical FS comment which requested that Alternatives 4 and 5 be combined into a single alternative that proposes that the cleanup work would be performed during service station upgrades in the near future to occur in conjunction with the required service station upgrades, but not to exceed three years from the Final RI/FS Report. However, this comment was not incorporated in the Report despite the fact that

¹ Arcadis, *Chevron Environmental Management Company, Draft Revised Feasibility Study Report, Former Chevron Service Station No. 211556, Toledo, Washington*, November 16, 2020.

² Ecology, *Comments on the Revised Agency Review Draft Feasibility Study Report, dated April 28, 2017, prepared by Leidos, Inc., letter addressed to Timothy L. Bishop, CEMC, August 18, 2020.*

Ecology granted a 60-day extension for the submittal of the Report³ as requested by CMEC and Arcadis so that Ecology's comments could be incorporated.⁴

2. Ecology's September 29, 2020, letter requested that Ecology be contacted as soon as possible, and before the new FS submittal deadline of November 16, 2020, if there are any comments that CEMC and Arcadis are proposing to not incorporate so that this can be discussed and agreed upon before the submittal. Ecology was not contacted by CEMC or Arcadis about the decision to not incorporate Ecology's comment #4.

The explicit premise for the granting of the 60-day extension was to allow for every effort to be made to reach agreement regarding how Ecology's comments are incorporated prior to the submittal of the revised FS. **However, CEMC and Arcadis did not contact Ecology as requested.**

Ecology requires that the Report be revised to incorporate the following comments:

1. Incorporate Ecology's comment #4 from the August 18, 2020, letter.
2. Section 3.6 Text Table:
 - a. The change that was made to incorporate Ecology's comment #2 was done incorrectly. Please the table to show a cleanup standard for lead of 220 milligrams per kilogram (mg/kg) for the 0-6 feet below ground surface (bgs) interval. Also the second row of the table needs to be changed from "0-15 feet bgs" to "6-15 feet bgs." A footnote also needs to be added that indicates that these cleanup levels are a conditional point of compliance subject to the requirements in Washington Administration Code (WAC) 173-340-7490(4).
 - b. The groundwater point of compliance shown in the table ("Active Station Property Boundary") is incorrect. As stated in WAC 173-340-720(8)(a), ground water cleanup levels shall be attained in all ground waters beneath the Site to the outer boundary of the hazardous substance plume.
3. Ecology's comment #3 from the August 18, 2020, letter requested that the summary of groundwater results include data collected since the report was prepared in 2017. The Report refers to Table 2A, Summary of Groundwater Monitoring Data 2017-2020; however, this table is not included in the electronic copy. Please include these data and available 2021 data in the Report. It is

³ Ecology, *Approval of proposed extension of schedule, revised Feasibility Study*, letter addressed to Timothy L. Bishop, CEMC, September 29, 2020.

⁴ Arcadis, *Response to Comments on Draft Feasibility Study Report, Chevron Service Station No. 21-1566*. Letter addressed to Steve Teel, Ecology, dated September 9, 2020.

Ecology's preference that these data be added to Table 2 rather than having two separate tables (Tables 2 and 2A).

4. Ecology's comment #6 from the August 18, 2020, letter required that all electronic data be uploaded and accepted into Ecology's Environmental Information Management (EIM) database. Additional data from 2016 to 2021 still need to be uploaded plus regular data submittals should follow each sampling event.

According to the schedule in Agreed Order DE 5236, the revised FS Report is due 30 days after Ecology's written comments are received. Therefore, the deadline for the revised FS Report submittal is July 24, 2021.

If you have any questions about this letter, please contact me at (360) 407-6247 or steve.teel@ecy.wa.gov.

Sincerely,



Steve Teel, LHG
Cleanup Project Manager/Hydrogeologist
Toxics Cleanup Program
Southwest Regional Office

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Ecology Site File