

Newman's Chevron Site - Status of VIA and Completion of RI
01/15/2022

Dale,

On behalf of Chevron Environmental Management Company (CEMC), Nordic Properties, Inc., and Victory Business Park, LLC (collectively, the PLPs), Leidos, Inc. (Leidos) is providing this response to your email from January 4, 2022 requesting an update on the status of vapor intrusion assessment (VIA) activities and completion of remedial investigation (RI) field activities for the Newman's Chevron Site.

Our response is organized based on the questions presented in your email.

1. What has been accomplished thus far?

With regard to the RI field activities completed to date, the following work has been accomplished and conclusions reached thus far:

- The nature and extent of petroleum impacts to soil have been delineated via the drilling of 45 borings (SB-1 through SB-30, UST-1 through UST-8, and SVP-1 through SVP-7)). These results indicate that petroleum hydrocarbons have migrated off of the former service station property from two discrete UST basin source areas, resulting in impacts to a residential property to the east, and City of Bremerton rights-of-way to the south and west.
- Groundwater has been determined to not be present at depths that would allow soil leaching to groundwater to be a potential completed pathway. Based on these results, site-specific TPH cleanup values were developed for each of the two UST source areas that are protective of a direct-contact exposure pathway. The results of this exercise indicate that RI sampling results from only two soil boring locations (SB-17 and UST-2) would exceed the site-specific TPH values for protection of direct contact. Both of these soils borings are located in the western portion of the Site, in the vicinity of the orphaned UST basin remaining from a previous service station configuration that operated on the Site.
- Five rounds of Tier 1 VIA sampling have been performed to date, the results of which indicate that BTEX, MTBE, and TPH are not present in shallow soil gas at concentrations that pose a risk to human health. However, naphthalene has been detected in shallow soil gas samples both on and off the service station property at concentrations that exceed the MTCA Method B sub-slab soil gas screening level (2.5 micrograms per cubic meter [$\mu\text{g}/\text{m}^3$]).

2. What is needed to complete the RI?

Further VIA work is needed to evaluate potential risks to human receptors that may result from possible naphthalene impacts to indoor air within residential structures near the Site.

- As communicated to Ecology in our email from August 25, 2021, laboratory analytical results from the June 2021 soil vapor sampling event (conducted using EPA Method TO-17 protocols) indicated that naphthalene was detected in the samples collected from each of the six soil vapor sampling probes, at concentrations ranging from 2.9 to 23 $\mu\text{g}/\text{m}^3$. Therefore, all samples contained naphthalene at concentrations that exceeded the MTCA Method B screening level for shallow soil vapor. Naphthalene had also been detected above the MTCA Method B screening

level in some of the samples collected during previous soil vapor sampling events using EPA method TO-15.

- Based on these results, and in consideration of Ecology's guidance for evaluating soil vapor intrusion, Leidos recommended that further VIA be conducted, in the form of a Tier II assessment, in order to evaluate any potential vapor intrusion concerns for indoor air to the service station building and nearby residences. As part of this work, installation and sampling of one new shallow soil vapor sampling probe on the property at 1932 5th Street was also proposed.
- Installation of the shallow soil vapor sampling probe on the property at 1932 5th Street was completed on November 1, 2021; however, sampling of this probe has been delayed to date for the reasons discussed below.

3. What are the issues you are working through that has delayed completion of the RI?

We are currently working through the following issues that have delayed completion of the RI field activities:

- Sampling of the new shallow soil vapor sampling probe on the property at 1932 5th Street has been delayed primarily by the consistently wet weather and above average rainfall that our area has been experiencing (online sources indicate that Seattle had the wettest meteorological Fall on record). Significant rainfall has the potential of creating a low-bias of the sampling results due to a reduction in the effective diffusion coefficient and decrease in the relative vapor saturation due to rainfall percolation/saturation in the unsaturated zone. We had planned to take advantage of, but missed, a short weather window to complete this work in mid-November due to a shipment of sampling supplies from the lab being lost by FedEx, which delayed delivery of the supplies by nearly a week.
- As expected, access negotiations for the properties at 2005/2007 6th Street and 1936 5th Street have also delayed progress on the Tier 2 VIA work. However, on December 15, 2021 we finalized execution of an amended access agreement for 1936 5th Street and are now just waiting on access to 2005/2007 6th Street. We have made numerous attempts to contact the property owner and her attorney and have explained that Ecology will need to become involved if they do not provide access promptly. It is our understanding that this property is a rental, with multiple tenants, which likely adds further complexity to the access negotiations.

4. Do you need Ecology's assistance in acquiring Access?

Yes, the PLPs would appreciate any assistance that Ecology can provide to expedite access negotiations for the property at 2005/2007 6th Street, if we do not receive a response by Friday January 14.

5. An approximate timeline for submitting a draft RI?

There are remaining tasks as identified above associated with our path forward for completion of the RI; therefore, the schedule outlined below is considered approximate and is subject to change based on new information or changes beyond the control of the PLPs. However, Leidos believes the following is a reasonable estimate of the approximate timeline for submitting a draft RI.

- a. Assume shallow soil vapor sampling completed on 1932 5th Street property – January 2022
- b. Assume all necessary access negotiations for Tier 2 VIA completed – February 2022

- c. Conduct initial inspections of residences to evaluate building construction and use (necessary for development of Tier 2 VIA sampling plan) – March 2022
- d. Develop Tier 2 VIA sampling plan – April 2022
- e. First round of Tier 2 VIA sampling (summer conditions) – June 2022
- f. Submittal of draft RI report (subject to revision based on results of second round of Tier 2 VIA sampling) – September 2022
- g. Second round of Tier 2 VIA sampling (winter conditions) – December 2022

There has been a significant amount of work conducted at the Site to date as part of the RI. However, the results of the RI work completed indicate that additional work remains to finish the RI according to MTCA requirements. The discovery of offsite contamination on an adjacent residential property and rights-of-way, and the potential for impacts to indoor air in nearby residences have warranted the methodical process that has been utilized to arrive at this point. Unfortunately, the work still required to complete the RI (the Tier 2 VIA) is logistically and technically complex to plan, implement, and evaluate. We trust that Ecology understands this, and recognizes the PLPs' efforts for sound, scientifically-based, decision making to support final remedy selection per MTCA requirements.

Please let me know if you have any questions or would like to further discuss the RI for this Site.

Thank you,

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