



ExxonMobil ADC site response to comments

June 15, 2022

Cleanup site ID: 5182

Facility site ID: 2728

Address: 2717 Federal Avenue, Everett Washington

County: Snohomish

Ecology held a comment period from May 12 – June 13, 2022, giving the public an opportunity to comment on several environmental cleanup planning documents for the [ExxonMobil ADC cleanup site](#).

We received one comment during this period. That comment and our response are attached here. Following that response, the documents were finalized without substantive changes.

Documents for public review during the comment period

- Draft Interim Action Work Plan
- Agreed Order Amendment
- SEPA Determination of Non-Significance
- Public Participation Plan

Site background

The predecessors of ExxonMobil Oil Corporation owned the entire site from 1927 to 1974. In 1974, Mobil Oil sold the northern part of the site to A.P. Miller for use by ADC.

ADC used their portion of the site for bulk petroleum operations until 1990; Mobil Oil operated the southern part of the site until 1987. Between 1998 and 2000, all structures and pipes were removed from the entire site. Following an investigation in 1998, an interceptor trench was built to recover petroleum. The site was paved and remains an asphalt parking lot today.

The site is contaminated with petroleum-related chemicals. Light non-aqueous phase liquid, which includes substances like petroleum that are less dense than water, has been observed in site soil and groundwater. Other contaminants found include: total petroleum hydrocarbons, carcinogenic polycyclic aromatic hydrocarbons, lead, benzene, ethylbenzene and xylene.

City of Everett

The City of Everett Public Works Department is a key stakeholder in the process of implementing the work at the ExxonMobil ADC Site – both for the interim and final cleanup actions. The parties responsible for design and construction shall coordinate closely with the City for work within and immediately adjacent to the Federal Avenue ROW, utility relocation or replacement, stormwater and construction runoff, and dewatering management. Approvals will be necessary for those items. That process has been started, but additional submittal, review and approval needs to be completed before construction. Please arrange a meeting to discuss coordination and approval requirements and schedule.

The Draft Interim Action Work Plan (IAWP) materials provided for public comment are at a very basic level of detail. They describe that all design and construction detail, including construction schedule will be provided to Ecology later in an Engineering Design Report (EDR), to be developed by the selected contractor following finalization of the IAWP. As a key stakeholder, the City of Everett requests the opportunity to review and comment on the EDR.

The IAWP states that permits will be acquired including building, grading, utility, Public Works, shoring and erosion control permits. If it is determined that the project is exempt from the procedural requirements of City permits due to MTCA permit exemptions, the City must still be involved to confirm and document that substantive requirements of our codes and permits have been met. Everett Municipal Code 14.28 Surface and Stormwater requirements shall be complied with.

Construction stormwater runoff and dewatering management from stockpile, loading, material management areas need to be handled diligently. Plans submitted separately to the City show an additional laydown area for contaminated material to be located east of Federal Avenue on the ExxonMobil ADC property. This was not discussed in the IAWP. All contaminated stormwater and construction waters should be fully contained, and appropriate BMPs implemented to ensure material is not tracked onto Federal Avenue or other off-site areas or allowed to discharge from the site without collection and treatment. No construction stormwater runoff and dewatering are to be discharged to the municipal storm drain system without City approval. Frequent inspections and documentation are required of all stages of construction to ensure compliance is met for all federal, State, and local requirements.

The IAWP acknowledges that Cardno and its contractor will coordinate with the City of Everett and utility providers for temporary relocation or replacement of stormwater, water, sewer and power utilities impacted by the project. The document also acknowledges that Cardno is aware of the City of Everett's plans to install a modular wetland permanent stormwater treatment facility within the Federal Avenue ROW immediately adjacent to the proposed barrier wall and will coordinate with the City for this work. This coordination is critical. Approval from the City and utility providers must be acquired prior to construction start.

City of Everett review and approval of proposed shoring is also required prior to construction start. No information has been provided regarding the design and construction technique for the shoring or proposed permanent barrier wall. The IAWP states that this information will be provided in the

forthcoming EDR. The permanent barrier wall will be immediately adjacent to the City's Federal Ave ROW and will be penetrated for permanent utilities. It is expected that City of Everett review and approval of the permanent barrier wall design will be received prior to construction start.

The document acknowledges that contamination will remain below Federal Avenue and the ExxonMobil and ADC-owned properties to the east. The City has concerns and interests regarding cleanup and future management of contamination within the ROW. ExxonMobil and their team need to coordinate closely with the City regarding the final remedial action plan for the ROW, ExxonMobil and ADC properties. To that end the City requests a meeting to discuss the remediation plans for that area and review of draft plans.

The schedule in Section 8 of the IAWP suggests that remedial excavation would be performed between June – September 2022. However, it is mid-June 2022, and the EDR has not yet been submitted; and City approvals have not been issued for the key elements of the work including utility relocations/ replacement and shoring design. It is stated in the IAWP that construction should occur in the dry season, and we agree that is important for construction stormwater runoff and dewatering management for the work to not occur in the rainy season. The City looks forward to receiving additional information about the construction schedule.

From: [Cook, Jason \(ECY\)](#)
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Cc: [Bobby Thompson](#); [MacClellan, Megan \(ECY\)](#); [Level, John A \(ATG\)](#); [Hargrove, Amy \(ECY\)](#)
Subject: Comment Response- Exxon
Date: Tuesday, June 14, 2022 9:22:26 AM

Good Morning and thank you for your recent comments regarding the Interim Action excavation on the Port of Everett Property.

In conversation with the consultant project (Cardno), the SWPPP, TECP and the Shoring Plan have been submitted to Sabrina Good at the City of Everett (City). The Shoring Plan was reportedly submitted yesterday and the SWPPP and TECP were submitted to the City in May.

The EDR Report is currently in Draft phase and has been submitted to the Port. Once the Port has commented, the EDR will be submitted to the City as well as Ecology, reportedly by early next week.

Finally, starting tomorrow, Exxon/ADC et al as well as the Port and Ecology will be having weekly progress meetings. I have requested the consultant invite you as well as Sabrina Good to these weekly meetings, which should provide pertinent and relevant updates as the project progresses.

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