From: Unruh, David (ECY)
To: Lynn Green; Maninder Singh
Cc: Evan Bruggeman; Erik Chapman; Paul Trone
Subject: RE: Texaco 211544 - Site Status
Date: Monday, April 25, 2022 11:48:00

Lynn,

Thank you for the prompt response, I'm glad to hear we're thinking along the same lines. Since we have a good understanding of the conditions at the site based on the previous investigations and the additional scope is pretty limited, I don't think an additional work plan is necessary here; we can just rely on the one you've already prepared for the right-of-way investigation. For consistency, the well should be installed with a screened interval comparable to the existing wells on site.

I'll look for the boring logs and building plans and once you have the next groundwater monitoring report ready, I'll have another look at the results from existing wells. Hopefully we can eliminate a few of those to save on analytical costs.

Thanks again,
David

David Unruh (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Desk: 206.594.0098 | Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov

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From: Lynn Green <lynng@evren-nw.com>
Sent: Monday, April 25, 2022 11:29
To: Unruh, David (ECY) <dunr461@ECY.WA.GOV>; Maninder Singh <MSingh@KAGreaterSeattle.Com>
Cc: Evan Bruggeman <evanb@evren-nw.com>; Erik Chapman <erikc@evren-nw.com>; Paul Trone <pault@evren-nw.com>
Subject: RE: Texaco 211544 - Site Status

David, thank you for your encouraging email. Here are my thoughts:

- Complete boring logs and well completion diagrams from the borings and well installation activities performed by Environmental Specialties in 2021 (Well-2 through -13, and SB-1 through -8).
    - I will ask Maninder for these boring and well logs and submit to you once I review.
- Details of your planned floor replacement with vapor and moisture barriers.
    - I will prepare a simple letter outlining the scope of work and product details.
- Your right-of-way investigation was helpful in characterizing the current condition of soil and groundwater in the southeast corner of the Site, but to get to closure, a few additional borings and analyses are needed.
    - A permanent monitoring well closer to the existing area of impacted soil in the southeast corner of the Site is needed. An additional well in the loading dock or sidewalk close to this area will help in understanding the groundwater gradient and flow direction in this area.

        - Do you want a work plan for this work, or should we install based on this comment (since pretty clear) and include in the next monitoring event? Also, since we just sampled the onsite wells, I am hoping I can provide you with a report documenting the second quarter 2022 monitoring event and agree on wells that can be eliminated from further monitoring to reduce ongoing monitoring costs. Based on your last comments, sounds like we are on the same page.
    - An additional boring on the west side of the site is needed to analyze soil in the vicinity of the former waste oil tank for compounds listed in Table 830.1 of the MTCA Rule and Table 7.2 in the Remediation of Petroleum Contaminated Sites Guidance.
        - This can be done concurrent with installation of the new monitoring well. Do you want a work plan for this, or since the objective in your comment is pretty clear, just complete this work and submit a report documenting this work?
    - Ideally, an additional boring along Greenwood Avenue to better bound the northern and eastern extent of contaminated soil in the loading dock area reported during excavations in 1996 (sample EXE-5).
        - Same comment. This can be done concurrent with installation of the new monitoring well. Do you want a work plan for this, or since the objective in your comment is pretty clear, just complete this work and submit a report documenting this work?
    - Ecology recognizes finding a location for these explorations may be difficult due to the location of utilities and the need for permits for the boring on the east side of the building.
- To calculate Method B cleanup levels, EPH/VPH analyses of soil samples with concentrations of TPH-G and –D above Method A are needed. See Section 8.5 of the Petroleum Contaminated Sites Guidance linked above for details on calculating cleanup levels. If the soil sample from 9 feet bgs in EB-1 you collected during your right-of-way investigation is still archived at the lab, it would be great to run the EPH/VPH analysis on that sample.
    - I have sent a request to the lab and will let you know what they say. We also are still waiting for the results of the TOC analysis from this same boring and will report this data once available since this data can be used to recalculated CULs.
- Please continue sampling Site wells on a quarterly basis. After another consecutive quarter of sampling, we can begin to exclude wells from the sampling program that do not contain Site contaminants of concern and are not located in areas where historical activities are cause for concern.
    - Please refer to Table 7.2 in the Petroleum Contaminated Sites Guidance for analytical needs for groundwater samples based on historical activities on the Property.
    - Based on the results of the Site Hazard Assessment for the SMI Inc. Trust Site, located north of your Property, include analysis of dissolved cadmium and lead in Well-12.
        - Will do.

Thanks, David! Lynn

Lynn D. Green, Ph. D.
P.G./R.G./L.G./C.E.G./L.E.G./CWRE/CESCL
Principal Engineering Geologist / Hydrologist
EVREN Northwest, Inc

Environmental and Natural Resource Consulting

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From: Unruh, David (ECY) <dunr461@ECY.WA.GOV>
Sent: Monday, April 25, 2022 11:01 AM
To: Lynn Green <lynng@evren-nw.com>; Maninder Singh <MSingh@KAGreaterSeattle.Com>
Subject: Texaco 211544 - Site Status

Hello Lynn and Maninder,

I had a chance to talk about your Greenwood Texaco Site with the Unit Supervisor for the VCP program about a path forward for the Site and I think we have a plan that should get the site to closure. Based on the low magnitude of the exceedances of TPH in soil and soil vapor, we're hoping we'll be able to use a model remedy with calculated Method B cleanup levels that will not require a new covenant and will eliminate the need for the existing one. There are a few data points we'll need to confirm this is the case:

- Complete boring logs and well completion diagrams from the borings and well installation activities performed by Environmental Specialties in 2021 (Well-2 through -13, and SB-1 through -8).
- Details of your planned floor replacement with vapor and moisture barriers.
- Your right-of-way investigation was helpful in characterizing the current condition of soil and groundwater in the southeast corner of the Site, but to get to closure, a few additional borings and analyses are needed.
    - A permanent monitoring well closer to the existing area of impacted soil in the southeast corner of the Site is needed. An additional well in the loading dock or sidewalk close to this area will help in understanding the groundwater gradient and flow direction in this area.
    - An additional boring on the west side of the site is needed to analyze soil in the vicinity of the former waste oil tank for compounds listed in Table 830.1 of the MTCA Rule and Table 7.2 in the Remediation of Petroleum Contaminated Sites Guidance.
    - Ideally, an additional boring along Greenwood Avenue to better bound the northern and eastern extent of contaminated soil in the loading dock area reported during excavations in 1996 (sample EXE-5).
    - Ecology recognizes finding a location for these explorations may be difficult due to the location of utilities and the need for permits for the boring on the east side of the building.
- To calculate Method B cleanup levels, EPH/VPH analyses of soil samples with concentrations of TPH-G and –D above Method A are needed. See Section 8.5 of the Petroleum Contaminated Sites Guidance linked above for details on calculating cleanup levels. If the soil sample from 9 feet bgs in EB-1 you collected during your right-of-way investigation is still archived at the lab, it would be great to run the EPH/VPH analysis on that sample.
- Please continue sampling Site wells on a quarterly basis. After another consecutive quarter of sampling, we can begin to exclude wells from the sampling program that do not contain Site contaminants of concern and are not located in areas where historical activities are cause for concern.

- Please refer to Table 7.2 in the Petroleum Contaminated Sites Guidance for analytical needs for groundwater samples based on historical activities on the Property.
- Based on the results of the Site Hazard Assessment for the SMI Inc. Trust Site, located north of your Property, include analysis of dissolved cadmium and lead in Well-12.

Ecology appreciates your efforts at the Site to date and we look forward to working with you to bringing the Site to closure. Please let me know if you'd like to schedule a video call to discuss further.

Thank you,
David

David Unruh (he/him) | Department of Ecology | Toxics Cleanup Program | Site Manager
Desk: 206.594.0098 | Cell: 206.459.6287 | Fax: 206.366.7810 | david.unruh@ecy.wa.gov
PO Box 330316, Shoreline, WA, 98133-9716