

- A draft Ventilation Work Plan¹ was transmitted to Ecology on January 6, 2023. Ecology approved the Ventilation Work Plan via email on January 9, 2023.
- The third sampling event was conducted on January 10, 2023, immediately before crawlspace ventilation was installed. Air sampling methods and results evaluation in 2022 and 2023 were conducted in accordance with procedures outlined in the VIAR². Adjusted indoor air concentrations of benzene, naphthalene, and/or total petroleum hydrocarbons (TPH) exceeded their respective indoor air MTCA Method B cleanup levels (indoor air cleanup levels) in three of the four indoor air sample locations during the January 2023 sampling event. The three TPH exceedances in Unit #125 and Unit #127 bathrooms correspond to crawlspace samples that also exhibit exceedances of indoor air cleanup levels. Benzene and naphthalene exceedances in Unit #131 did not correspond to the associated crawlspace sample results. Validated sampling results for the January 2023 event are included in Table 1.
- Crawlspace ventilation was installed on January 10 and 11, 2023, in accordance with the Ventilation Work Plan. The electrical was connected and the ventilation system became operational on January 17, 2023. The first operation and maintenance (O&M) visit was conducted at this time.
- The fourth sampling event was conducted on February 22 and 23, 2023, approximately a month after the active crawlspace ventilation began. A crawlspace ventilation system effluent sample was also collected concurrently during the February 2023 sampling event. The ventilation sample result was not adjusted for ambient, background conditions.
- Original and adjusted (net) indoor air concentrations of TPH exceeded their respective indoor air cleanup levels in two of the four indoor air sample locations (Unit #129 and Unit #131) during the February 2023 sampling event. Adjusted indoor air concentrations of benzene and naphthalene exceeded their respective indoor air cleanup levels in Unit #131. Draft, unvalidated sampling results for the February 2023 event are included in Table 2.
- For the February 2023 sampling event, both sampling locations (Unit #129 and Unit #131) with indoor air cleanup level exceedances had corresponding crawlspace concentrations comparable to ambient air and less than indoor air cleanup levels. These results indicate that PVI is not impacting indoor air quality. The tenants in Unit #131 smoke indoors, which is potentially influencing indoor air quality in that unit.
- Additional O&M visits occurred on February 22 and March 21, 2023. Each O&M visit has indicated that the fan is functional and inducing a vacuum in the crawlspace.

¹ Aspect Consulting, LLC (Aspect), 2023, Ventilation Work Plan, Texaco Strickland Site, draft January 6, 2023.

² Analytical results for air (both crawlspace and indoor air) were adjusted for ambient, background conditions in accordance with Ecology Guidance for Evaluating Vapor Intrusion in Washington State (Ecology, 2022) and compared to the generic MTCA Method B cleanup level for TPH in indoor air. The adjusted values are presented at net concentrations in Tables 1 and 2.

Interim Action

Progress on the IA during the first quarter 2023 is summarized as follows:

- Contaminated soil between the north wall and the property boundary was excavated using a vactor truck and exported for disposal at the Cadman facility in Everett. North wall vactor excavation was completed on January 4, 2023. All remaining exceedances of remediation levels at the final north wall limits are located in off-property soils in the right-of-way.
- Final IA construction closeout was completed on January 6, 2023, marking the completion of the IA implementation.
- Ecology provided comments on the draft Interim Action Status Letter (dated December 8, 2022) on February 8, 2023. Comments are addressed in the Ecology Review Draft Interim Action Report (IAR), and an Interim Action Status Letter Comment response memorandum was transmitted to Ecology along with the IAR on April 6, 2023.

Sampling and/or Testing Reports Received

Validated sampling results for the January 2023 air sampling event and draft, unvalidated sampling results for the February 2023 air sampling events are included in Tables 1 and 2, respectively. Laboratory reports for both air sampling events are included in Appendix A.

IA performance soil sampling results received in January 2023 are included in the draft IAR.

Summary of Deviations

The IA vactor excavation behind the north wall was a deviation from the IAWP, and was performed to achieve removal of contaminated soil to the maximum extent practicable at the Site during the IA. The north wall vactor excavation achieved removal of all remaining contaminated soil from the property.

Contacts with Other Entities or Public

The draft Ventilation Work Plan was transmitted to the Snohomish County Health Department (SCHD) on January 6, 2023, along with a ventilation implementation schedule. A follow-up email indicating that both pre-ventilation sampling and ventilation installation and startup had occurred was transmitted to SCHD on January 22, 2023.

Coordination with the Chri-Mar Apartment building manager occurred in advance of each sampling event, and in advance of crawlspace ventilation installation.

Potential Problems and Suggested Solutions

No potential problems are anticipated for second quarter 2023 activities.

Changes in Key Personnel

No changes in key personnel occurred during first quarter 2023.

Activities Planned for the Next Reporting Period

The following activities for the RI and IA are planned for the second quarter 2023:

Remedial Investigation

- Crawlspace ventilation O&M will continue monthly in accordance with the Ventilation Work Plan. The next air sampling event is scheduled to occur in the third quarter 2023, approximately 6 months after the start of ventilation.
- With the implementation of crawlspace ventilation on January 10, 2023, the remaining RI data gap is considered closed. Aspect filed an AO Schedule Extension Request on December 13, 2022, which was granted. The Agency Review Draft RI Report is now due to Ecology on July 10, 2023, and will include the crawlspace ventilation installation and performance.

Interim Action

- The Final IAR will be submitted to Ecology 30 days after we receive comments from Ecology.
- The analytical data collected during the Interim Action will also be uploaded to Ecology's Environmental Information Management (EIM) database within 60 days of it being validated in accordance with WAC 173-340-840(5), Ecology's Toxics Cleanup Program Policy 840 (Data Submittal Requirements), and the IAWP. Based on the date of received validated data, it will be uploaded to EIM by May 2, 2023.
- With completion of the IA and the pending submittal of the RI Report, a key technical meeting of Ecology and PLPs will be held during the next reporting period.

The next quarterly progress report will be submitted on or before July 10, 2023.

If you have any questions concerning this progress report, please contact Adam Griffin at 206-780-7746.

Sincerely,

Aspect Consulting, LLC



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Washington State Department of Ecology
April 14, 2023

Project No. 180357

Attachments: Table 1 – Ambient, Crawlspace, and Indoor Air Analytical Results – January 2023
Table 2 – Ambient, Crawlspace, and Indoor Air Analytical Results – February 2023
Appendix A – Air Analytical Laboratory Reports Received in 2023

cc: Ryan Megenity – Rainier Property Management Co. LLC
Doug Steding – Northwest Resource Law PLLC
Nate Blomgren – Chevron Environmental Management Company
Jon-Erik Magnus – Rogers Joseph O’Donnell PLLC
Robert Goodman – Rogers Joseph O’Donnell PLLC
Eric Epple – Arcadis
Ada Hamilton – Arcadis

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TABLES

APPENDIX A

Air Analytical Laboratory Reports Received in 2023