

July 13, 2023

Dale Myers Washington State Department of Ecology Northwest Regional Office 15700 Dayton Avenue North Shoreline, WA 98133

Re: Progress Report No. 19 – 2nd Quarter 2023

Texaco Strickland Cleanup Site 6808 196th Street SW Lynnwood, Washington 98036 Agreed Order No. 14315 Ecology PM – Dale Myers Aspect Project No. 180357

Dear Dale:

Aspect Consulting, LLC (Aspect) prepared Progress Report No. 19 on behalf of potentially liable persons (PLPs) Strickland Real Estate Holdings (SREH) and Chevron Environmental Management Company (CEMC), who are signatories to Washington State Department of Ecology (Ecology) Agreed Order (AO) #14315, effective September 10, 2018, for the Texaco Strickland Site (Site). The AO requires that the PLPs submit quarterly progress reports to Ecology until satisfaction of the Agreed Order.

This Progress Report No. 19 is for the second quarter 2023 reporting period ending on June 30, 2023.

Progress Made During the Reporting Period

The following sections detail the progress during the reporting period.

Remedial Investigation

All RI data gaps were closed as of 1st quarter 2023. The following was competed regarding the RI in 2nd quarter 2023:

- Chri-Mar Building crawlspace ventilation O&M visits occurred on April 24, May 30, and June 30, 2023. Each O&M visit confirmed the fan is functional and inducing a vacuum in the crawlspace.
- A technical meeting was held on May 5, 2023, between Ecology, the PLPs and Aspect. The technical meeting minutes are attached.
- All outstanding RI data were submitted to EIM on June 8, 2023. Outstanding RI data included a correction to November 2022 air data and submitting January and February 2023 air data.

- Project No. 180357
- Aspect had a follow-up technical call with Ecology on May 23, 2023 to clarify the scope and purpose of the waste oil technical memorandum, which Ecology requires for IA completion.
- The RI Report was revised to include the results of pre- and post-crawlspace ventilation air sampling results.

Interim Action

Progress on the IA during 2nd quarter 2023 is summarized as follows:

- The Final Interim Action Report (IAR) was transmitted to Ecology on April 27, 2023.
- The IA data were submitted to EIM on May 3, 2023.

Sampling and/or Testing Reports Received

No sampling or testing results were received during this reporting period.

Summary of Deviations

There have been no deviations from the AO during this reporting period.

Contacts with Other Entities or Public

Progress Report No. 18 was transmitted to the Snohomish County Health Department (SHD) on May 10, 2023, with post-ventilation sampling results.

Potential Problems and Suggested Solutions

No potential problems are anticipated for 3rd quarter 2023 activities.

Changes in Key Personnel

No changes in key personnel occurred during 2nd quarter 2023.

Activities Planned for the Next Reporting Period

The following activities are planned for the 3rd quarter 2023:

- The Agency Review Draft RI Report will be transmitted to Ecology by July 14, 2023 (see attached). Per the AO, the Public Review Draft of the RI Report will be due 30 days after receipt of Ecology comments.
- A SAP for post-IA groundwater monitoring will be submitted to Ecology for approval. The well network is tentatively scheduled to be installed and sampled in August 2023.

The next quarterly progress report will be submitted on or before October 15, 2023.

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

Project No. 180357

Sincerely,

Aspect Consulting, LLC

Adam Griffin, PE

Senior Associate Engineer agriffin@aspectconsulting.com

Breeyn Greer, PE

Brugn Green

Project Engineer

bgreer@aspectconsulting.com

Attachments:

Attachment A – Technical Meeting Minutes

Attachment B – Email Correspondence with Dale Myers, July 11, 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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ATTACHMENT A

Technical Meeting Minutes



MEETING MINUTES

Project No.: 180357

Date/Time: Friday May 5, 2023, 9:00-11:00 AM

Location: Teams Meeting

Planned Dale Myers (Ecology), Ryan Hultgren, Josh Sales, and Bobby Ardissono Attendees: (Kennedy Jenks), Nate Blomgren (Chevron), Eric Epple and Ada Hamilton

(Arcadis), Breeyn Greer, Adam Griffin, and Daniel Babcock (Aspect)

Re: Texaco Strickland – Technical Meeting

Chri-Mar Building Ventilation

- 1. Breeyn Ventilation system operating according to design. Aspect conducts monthly Operations and Maintenance (O&M) visits; All ventilation install, O&M, and monitoring results to be included in Draft Remedial Investigation (RI).
- 2. Dale request RI include discussion of benzene source in indoor air, if not crawlspace.
- **3.** Dale request that Feasibility Study include any cleanup requirements for Chri-Mar indoor air protection and acknowledges potential for continued ventilation. Nate acknowledges that if data shows that Chevron Contaminants of Concern (COCs) are a source to Chri-Mar indoor air risk, then Chevron will stay involved at the Site.
- **4.** Breeyn states next sampling event proposed for September 2023 and that results will be evaluated to determine if continued active ventilation is appropriate in accordance with the Ecology-approved Ventilation Work Plan.
- **5.** Communication with Snohomish County Health Department (SHD) Aspect to email indoor air results with bullet summary for public audience. Ecology shared SHD had no technical opinion on work to date, and requested that they be cc'd on communication with SHD.
- **6.** Communication with Chri-Mar Ecology requests any substantive communication be included in quarterly reports.
- 7. Eric asks about Chri-Mar Vapor Intrusion preliminary conclusions:
 - **a.** SHD and Chri-Mar communications will be limited to ventilation operating according to design. Chevron and Strickland team to coordinate communications.
 - **b.** The detailed conclusions and assessment of indoor air exceedances to be included in Draft RI.

Remedial Investigation Report

- **8.** EIM upload of validated Interim Action data complete on 5/3.
 - **a.** Ecology identified EIM action for November 2022 results.
- 9. Final data gap (Chri-Mar VI) closed.

May 10, 2023 Project No.: 180357

Interim Action Completion

- **10**. Strickland moving forward with leasing and using land estimated timeline of 18 months.
- 11. Ecology requests a separate memo regarding the Jiffy Lube Site, showing that all oil-range constituents in soil are gone, and all groundwater is clean of motor oil. Dale indicates this is required to close Jiffy Lube site and is necessary for IA completion letter.
- 12. Dale wants to include following in IA completion letter.
 - **a.** Excavation conducted to maximum extent practicable (lot line to lot line) and property is clean.
 - **b.** IA addresses Jiffy Lube site.
- **13.** Aspect to prepare Sampling and Analysis (SAP) for post-IA groundwater monitoring and shares proposed location map.
 - i. Dale asks about MW-17 groundwater result and potential for recontamination. Adam responds that shoring and controlled density fill (CDF) backfill provides a barrier, evaluating that question is objective of SAP, and that additional monitoring is necessary to determine groundwater Conceptual Site Model (CSM).
 - ii. Dale asks about MW-33 location, and requests two monitoring wells on southern property boundary. Adam responds they will evaluate and propose in SAP.
 - iii. Dale requests preparation and submittal of SAP for post-IA groundwater monitoring

Feasibility Study Report

- **14.** Adam and Dale discuss preliminary cleanup requirements:
 - **a.** Property soil compliance achieved.
 - i. Soil exceedances in rights-of-way (ROW) will require environmental covenant with City & Contaminated Media Management Plan (CMMP).
 - **ii.** Empirical demonstration of soil benzene exceedances requires groundwater monitoring.
 - **b.** Post-IA groundwater monitoring needed to determine any groundwater cleanup requirements and update groundwater CSM.
- **15.** Ecology agrees with Aspect proposal to implement SAP and conduct 4 quarters of groundwater monitoring before submittal of FS.

Review Action Items

- 16. SHD Communication.
- 17. Chri-Mar Communication.
- **18**. PLPs to prepare draft RI Report due to Ecology on July 10, 2023.

MEETING MINUTES

May 10, 2023 Project No.: 180357

- 19. PLPs to respond to Ecology request for waste oil memo for Jiffy Lube site.
- 20. PLPs to prepare and submit SAP for post-IA groundwater monitoring.

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ATTACHMENT B

Email Correspondence with Dale Myers, July 11, 2023

From: Myers, Dale - TCP (ECY)

To: Adam Griffin

Cc: Blomgren, Nathan F; Hamilton, Ada; Daniel Babcock; Myers, Dale - TCP (ECY)

Subject: RE: Texaco Strickland Site - Agency Review Draft RI Report

Date: Tuesday, July 11, 2023 3:12:03 PM

Adam

This was anticipated and the 14th will work for me.

Please capture this email chain in your next report.

Thanks

Dale

Dale Myers
Department of Ecology
Formal LUST Site Project Manager
Northwest Regional Office
Cell Phone No.: (425) 389-2521

Shoreline physical address: 15700 Dayton Ave N, Shoreline, WA

Shoreline Mailing address: PO Box 330316, Shoreline WA 98133-9716

From: Adam Griffin <agriffin@aspectconsulting.com>

Sent: Tuesday, July 11, 2023 3:09 PM

To: Myers, Dale - TCP (ECY) <DAMY461@ECY.WA.GOV>

Cc: Blomgren, Nathan F <nathan.blomgren@chevron.com>; Hamilton, Ada

<ada.hamilton@arcadis.com>; Daniel Babcock <dbabcock@aspectconsulting.com>

Subject: Texaco Strickland Site - Agency Review Draft RI Report

Hello Dale -

As you may have anticipated, we need a minor extension of the RI due date of 7/10. We are wrapping it up and anticipate having the Agency Review Draft into your hands by this Friday the 14th. Let us know if you have any questions,

Adam Griffin, PE | Senior Associate Remediation Engineer | Direct: 206.780.7746 | Cell: 865.696.7658 **Aspect Consulting LLC** | 23 S. Mission Street, Suite C, Wenatchee, WA 98801 | www.aspectconsulting.com

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