

9 June 2023

Memorandum

To: Dale Myers
From: Ryan Hultgren, Kennedy Jenks
Subject: Texaco Strickland Project Summary
K/J 1996002*02

Introduction

The Texaco Strickland Cleanup Site is a former gas station located at 6808 196th Street Southwest and occupies the northwestern and southeastern corners of the intersection of 196th Street Southwest and 68th Avenue West in Lynwood, Washington. In 1959, the Property was developed as a gasoline service station which continued operations until 1974. There is no record of how the dispenser island/piping/underground storage tanks (USTs) were closed.

In 1977, the Property was developed as a lube facility with Jiffy Lube taking over operations in 2004. Jiffy Lube operated the lube facility until 2006 when the facility closed. The lube facility building was renovated into a restaurant, Aloha Café which operated between 2006 and 2018. The Property has been vacant since 2018 to allow for ongoing remedial investigations. The building was demolished in 2022 during implementation of an interim action to excavate contaminated soil.

The Property is zoned commercial with the surrounding area a combination of commercial and residential properties. A low-income apartment complex (The Chri-Mar Apartments) is located adjacent and south of the Site. A dry cleaners and carpet store occupies the adjacent property to the west. There are concerns that a dry-cleaning solvent plume from the dry cleaners has comeled with the gasoline plume from the Site, which impacts the low-income Chri-Mar Apartments.

In 1995, impacted soil was discovered during underground storage tank (UST) decommissioning and motor oil-impacted soil was removed. Equilon Enterprises, LLC dba Shell Oil Products US (Shell) subsequently completed an RI for the Site under the Voluntary Cleanup Program (VCP) with Ecology (Conestoga-Rovers & Associates [CRA], 2011).

Historical service station operations resulted in the release of petroleum hydrocarbons to the subsurface impacting soil and groundwater on the Property and groundwater impacts have migrated off-Property.

The Texaco Strickland Cleanup Site has been under an Agreed Order since 28 August 2018 to

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draft a Remedial Investigation Work Plan (RIWP), complete a draft Remedial Investigation/ Feasibility Study (RI/FS), and a preliminary draft Cleanup Action Plan (DCAP). The Potential Liable Persons (PLPs) will then assist Ecology with preparing the RI/FS and DCAP for public comment.

List of PLPs and their associated consulting firms included below:

PLPs	Consultants
Strickland Real Estate Holdings, LLC	Aspect Consulting
Chevron Environmental Management Company	Arcadis

Project Milestones

Below is a list of project milestones included in the Kennedy Jenks proposal dated 9 January 2019.

1. Remedial Investigation (RI) Planning, RI Work Plan (WP) Review, and associated meetings.
2. RI Report review, comments, and associated meetings.
3. Feasibility Study (FS) Report support, including review, comments, and associated meetings.

Work Completed to Date

Work completed for each project milestone is listed below. In the following bullets there are references made to final deliverables being provided by Kennedy Jenks. These final deliverables are included in Attachment 1, along with selected other documents (e.g., data figures or maps prepared by Kennedy Jenks).

1. Remedial Investigation Work Plan

- Review of the Remedial Investigation Work Plan for the Texaco Strickland Site (Aspect Consulting, December 2018) was completed, and comments provided by Kennedy Jenks in January 2019 (attached).

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- An introductory site walk was conducted with Kennedy Jenks and the Ecology Site Manager on 20 January 2019. (Summary attached).
- The Texaco Strickland Site File Schema was updated by Kennedy Jenks on 19 March 2019.
- The RIWP was implemented in 2019. Data from the implementation was reviewed and iso-concentrations maps were created by Kennedy Jenks in February and March of 2020 and submitted to Ecology on 11 March 2020 (attached). Further data analysis was conducted by Kennedy Jenks and provided in April 2020 (see below).
- An Addendum to the RIWP was provided to Ecology on 25 March 2020 for review. The RIWP Addendum was reviewed by Kennedy Jenks and comments (attached) were provided on 3 April 2020.
- A meeting was held on 23 April 2020 with Ecology, Kennedy Jenks and the PLPs to discuss Ecology comments on the RIWP Addendum. Prior to the meeting, at Ecology's request, Kennedy Jenks prepared and submitted to Ecology copies of selected chromatograms and a map showing sample locations (attached). Kennedy Jenks developed draft minutes for the meeting.
- A revised RIWP Addendum was provided to Ecology on 22 May 2020. A review of the revised RIWP Addendum was completed by Kennedy Jenks and draft comments were provided on 22 May 2020 (attached; no further revisions submitted).
- A meeting was held on 24 September 2020 to further discuss the RIWP Addendum and the idea of implementing an Interim Action Work Plan to fill in missing data gaps. Kennedy Jenks developed draft minutes for the meeting.
- Additional review of RIWP data collected in 2019 and 2020 was conducted in December 2020 including preparation of a draft table summarizing results (attached).
- An Interim Action Work Plan (IAWP) was prepared and provided to Ecology on 10 May 2021 for review. Kennedy Jenks reviewed the IAWP and provided comments on 17 May 2021 (attached).
- Interim action to excavate and dispose offsite light non-aqueous phase liquid (LNAPL) source material and contaminated soil, was initiated on 30 August 2022 with excavation activities completed through January 2023. The majority of confirmation soil samples were collected from the initial excavation extents on or before 28 October 2022. Interim

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Action activities included well decommissioning, building demolition, utility disconnection, shoring well construction, soil excavation and off-site disposal, water management, backfill and engineering controls.

- Three site visits were conducted by KJ in 2022 (2/15/2022, 9/7/2022, and 10/11/2022) prior to and during interim action implementation.

2. Remedial Investigation Report

- The (draft and final) Remedial Investigation Report has not been completed. Data collected from implementation of the RIWP in 2019 was reviewed in 2019 and 2020 as noted in the previous section. An RIWP Addendum was prepared in 2020, which was followed by preparation of an IAWP in 2021 to be implemented to fill in data gaps and remove LNAPL and contaminated soils.
- An Interim Action Status Letter Report was prepared and submitted by the PLPs to Ecology on 8 December 2022 documenting the results of the Interim Action. Kennedy Jenks reviewed the letter report and final comments (attached) were provided on 7 February 2023.
- A Final Interim Action Report was provided by the PLPs to Ecology on 6 April 2023. Kennedy Jenks reviewed the report and provided additional comments on 18 April 2023 (attached). The revised Final Interim Action Report was provided by the PLPs to Ecology on 26 April 2023.
- A project meeting was conducted on 5 May 2023 and was attended by the PLPs, their consultants, Ecology and Kennedy Jenks. Purpose of meeting was to discuss results of Chri-Mar Building ventilation sampling, post-Interim Action groundwater monitoring, development of the Interim Action Completion report and preparation of the Feasibility Study Report for the project. Minutes from the meeting were provided on 10 May 2023 for review. Kennedy Jenks completed a review of the minutes and provided comments on 22 May 2023.
- Several documents were provided by Ecology to Kennedy Jenks in 2022 and 2023 regarding the Chri-Mar Apartments Vapor Intrusion Assessment (VIA), but review was not requested by Ecology:
 - On 13 December 2022, the PLPs submitted to Ecology draft unvalidated vapor intrusion assessment (VIA) results from November 2022 along with data from December 2021.

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- Chri-Mar Building ventilation sampling was conducted in January 2023. Results of this sampling was provided to Ecology on 3 May 2023.
- A Ventilation Work Plan was submitted by the PLPs to Ecology on 6 January 2023. Ecology approved the work plan on 9 January 2023. Crawlspace ventilation was installed 10-11 January 2023 in accordance with the work plan.
- Chri-Mar Building air sampling was conducted in January 2023 prior to and February 2023 following installation of the crawlspace ventilation system. Unvalidated air sampling results from both events were provided in the first quarter 2023 progress report to Ecology (dated 14 April 2023).
- Kennedy Jenks received the Ventilation Work Plan on 5 May 2023 and the first quarter 2023 progress report on 25 May 2023; Kennedy Jenks did not provide comments on either document. The work plan and air sampling data were discussed during the 5 May 2023 project meeting.

3. Feasibility Study Report

- No progress has been made toward this milestone. As discussed during the 5 May 2023, post-Interim Action groundwater monitoring is required to determine any groundwater cleanup requirements and update groundwater conceptual site model (CSM).

Ongoing Work

Ongoing groundwater monitoring will be implemented following the Interim Action to assess the potential for ongoing impacts to groundwater. Depending on the results of the groundwater monitoring program, additional remediation may be required on site. Periodic air sampling of the crawlspace ventilation system will be conducted to further evaluate its performance.

Enclosures:

1. Attachment 1: Final comments and data presentations provided by Kennedy Jenks.