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December 9, 1997

Washington State Department of Ecology
Northwest Regional Office
3190 - 160th Avenue
Bellevue, Washington 98008-5452

Attention: Brian Sato

Revised Work Plan
Supplemental Environmental Assessment
Vicinity of 2nd Street
and Avenue "D" Intersection
Snohomish, Washington

INTRODUCTION

This submittal presents the revised scope of services for completing a supplemental environmental assessment near the intersection between Second Street and Avenue "D" in Snohomish, Washington. This scope revises the original scope of services provided for a supplemental environmental assessment at the intersection, dated July 23, 1997, and supersedes our "Revised Work Plan" dated October 20, 1997. A portion of the services in the July 23, 1997 scope have been completed and the results are summarized in the following:

- *Supplemental Environmental Assessment, August 1997* (GeoEngineers, August 27, 1997)
- *Air Monitoring Results, Building Odor Investigation* (Fluor Daniel GTI, August 27, 1997).

Tosco Marketing Company's (Tosco) former Unocal Site No. 4165 is located at the northwest corner of the intersection; Associated Glass (formerly Duffy's Spee-Dee Mart and Texaco service station) is located at the northeast corner of the intersection; Southland Corporation's 7-Eleven/Citgo convenience store and fueling station is located at the southeast

corner; and Bullet Graphics is located at the southwest corner. Other properties cited in this proposal include the Terry Nation residence at 120 Avenue "D", and the Cheryl Kelnhofer residence at 124 Avenue "D" and the Ryan Fielder residence at 212 Avenue "D".

The purpose of this proposed scope of services is to continue to address the concerns of residents and business owners in the vicinity of the intersection regarding indoor air quality and drinking water quality. This revised scope was discussed during a meeting at GeoEngineers on September 19, 1997, attended by Wally Moon of Ecology, Tim Johnson of Tosco, Bob DeNinno of Southland Corporation, Stan Haskins of Fluor Daniel GTI, Dr. Miles Athey of Athey Consulting Services, and Jim Miller and Lisa Bona of GeoEngineers. The scope is presented in two tasks: (1) sampling of drinking water, and (2) sampling of indoor air. The field work will take place on an on-call basis, after the citizen group of Cheryl Kelnhofer, Ryan Fielder and Ruth Winchester (the proprietor of Bullet Graphics) has initiated the alert procedure outlined in Attachment B when they believe that conditions are equal to the worst-case conditions that they have experienced in the past. We anticipate that the request will come during a period of heavy precipitation, based on our knowledge of previous worst-case conditions.

SCOPE

I. SAMPLING OF DRINKING WATER

1. Maintain a site-specific health and safety plan.
2. Obtain a sample of water from an indoor faucet of the Cheryl Kelnhofer residence on an on-call basis. Cheryl Kelnhofer will follow the alert procedure described in Attachment B, and a field person from GeoEngineers will mobilize and obtain the sample as soon as practically possible after the alert procedure is initiated. The water sample will be submitted to North Creek Analytical for chemical analyses of the following: volatile organic compounds (VOCs), including benzene, ethylbenzene, toluene and xylenes (BETX), by EPA Method 8240; semivolatile organic compounds (SVOCs) by EPA Method 8270; gasoline-range hydrocarbons by Ecology Method WTPH-G; and diesel- and heavy oil-range hydrocarbons by Ecology Method WTPH-D extended with a sulfuric acid/silica gel cleanup. The water sample will be submitted on a 5-day turnaround basis.
3. Evaluate the chemical analytical data with respect to MTCA Method A cleanup levels and potential human health issues.
4. Provide data to Ecology and Dr. Athey for access by interested parties.

II. SAMPLING OF INDOOR AIR

Procedure

Air sampling also will be conducted on an on-call basis, and will be conducted over a 24-hour period at each of the Terry Nation and Ryan Fielder residences and at Bullet Graphics. Ryan Fielder will follow the alert procedure described in Attachment B, and a field person from Fluor Daniel GTI will mobilize and obtain the samples from the Terry Nation and Ryan Fielder residences as soon as practically possible after the alert procedure is initiated. The field person from Fluor Daniel GTI will mobilize on a Saturday evening following the initiation of the alert procedure by Ruth Winchester to allow placement of the sampling devices while Bullet Graphics is closed for business. Nine air samples will be collected at Bullet Graphics, the Terry Nation residence and the Ryan Fielder residence, including: (1) two samples (including one duplicate) that will be collected from the basement of the Terry Nation residence and another sample that will be collected in a separate room on the first floor of the residence to be used as a control sample; (2) two samples (including one duplicate) that will be collected from the basement of the Ryan Fielder residence and another sample that will be collected in a separate room on the first floor of the residence to be used as a control sample; and (3) one air sample and its duplicate sample from Bullet Graphics that will be collected in the restroom, and the control sample that will be collected in the front room.

Each air sample will be collected over a 24-hour period using a 6-liter Summa canister with an attached 24-hour regulator. The regulator will allow the canister to draw air continuously over the 24-hour sample period. The air samples will be shipped to Air Toxics Ltd. in Folsom, California for analysis on a 5-day turnaround basis.

Analytical Methods

The Summa canister samples will be analyzed using EPA Method TO-14. Method TO-14 uses a gas chromatograph/mass spectrometer (GC/MS) to identify 62 known compounds and the top 15 tentatively identified compounds (TICs).

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This plan has been developed and accepted by the parties on the attached signature page.

ATTACHMENT A

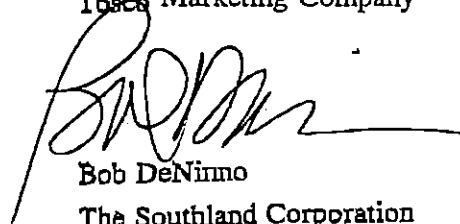
SIGNATURE PAGE

Sincerely,



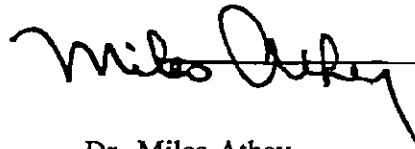
Timothy D. Johnson

Tosco Marketing Company



Bob DeNinno

The Southland Corporation



Dr. Miles Athey

Athey Consulting Services

ATTACHMENT B

ALERT PROCEDURE

I. SAMPLING OF DRINKING WATER

Cheryl Kelnhofer will report to Athey Consulting Services immediately upon detecting an odor or taste associated with her drinking water that she believes is equal to the worst-case conditions that she has experienced in the past. She also will complete the blanks on page 3 of this attachment and will not use any household taps until after sampling is completed. Miles Athey will frequently check his messages during business hours if he is not in the office. Athey Consulting Services will notify Lisa Bona of GeoEngineers on weekdays between the hours of 8:00 am and 5:00 pm at her direct line at GeoEngineers. On weekdays after 5:00 pm but before 9:00 pm, and on weekends after 8:00 am and before 9:00 pm, Athey Consulting Services will notify Lisa Bona at home. Messages may be left at either phone number. If Miles Athey is out during business hours, Cheryl Kelnhofer may call Lisa Bona at GeoEngineers directly, at (425) 861-6057. Lisa Bona or another representative of GeoEngineers' staff will confirm a site visit with Cheryl Kelnhofer and mobilize as soon as practically possible. Miles Athey will accompany GeoEngineers, if possible, during the site visit and will take the Event Report (page 3 of this attachment).

II. SAMPLING OF INDOOR AIR

Sampling of indoor air likely will occur during two separate 24-hour periods, since Bullet Graphics should be sampled over a Sunday, while the business is closed, and the residences may be sampled whenever the alert procedure is initiated.

Ruth Winchester and Ryan Fielder will report to Athey Consulting Services immediately upon detecting vapors either in Bullet Graphics or the Fielder residence, that are equal to the worst-case conditions that they have experienced in the past. (Ruth Winchester will use the date of vent installation in the restroom as an initial point of reference.) If one person reports vapors, Miles Athey will contact the other residences/businesses listed in this work plan for a report of conditions at their respective buildings. Ruth Winchester and Ryan Fielder also will complete the blanks on page 3 of this attachment. Ryan Fielder will leave his basement closed until Fluor Daniel GTI arrives. Ruth Winchester will close her restroom door and the restroom vent as soon as practical on the day of sampling, and the door will remain closed until Fluor Daniel GTI arrives. Miles Athey will frequently check his messages during business hours if he is not in the office. Athey Consulting Services will notify Stan Haskins of Fluor Daniel GTI on weekdays between the hours of 8:00 am and 5:00 pm at Fluor Daniel GTI. On weekdays after 5:00 pm but before 9:00 pm, and on weekends after 8:00 am and before 9:00 pm, Athey Consulting Services will notify Stan Haskins at home. Messages may be left at either phone number. Miles Athey also will notify Terry Nation to obtain access to her residence. If Miles Athey is out

during business hours, Ruth Winchester and/or Ryan Fielder may call Stan Haskins at Fluor Daniel GTI directly, at (425) 251-5441. Stan Haskins or another representative of the Fluor Daniel GTI staff will call Ruth Winchester to confirm a site visit and mobilize the Saturday following the initiation of the alert procedure. Miles Athey will accompany Fluor Daniel GTI during the site visit, if possible, and take the Event Report (page 3 of this attachment).

EVENT REPORT

I. Name of person reporting event:

II. Date of observation:

III. Time first observed on date:

IV. Time Athey Consulting Services notified:

V. Nature of event (describe in as much detail as possible):

A. Identify odor:

B. Where is odor coming from within the building?:

C. How long did the odor last (if it diminished?)

D. Other observations:

VI. Tap shut off or room closed since what date and time?

VII. When was the last date (approximately) that the reported condition has seemed as noticeable?

VIII. If possible, ask a neighbor to witness your observations and record their name and the time.

ALERT PROCEDURE (SUMMARY)

I. SAMPLING OF DRINKING WATER

Cheryl Kelnhofer will:

1. Call Miles Athey: (425)334-3157.
2. If no answer from Miles Athey during business hours, call Lisa Bona at (425) 861-6057. Press "0" to have Lisa Bona paged if no answer.
3. Fill out the Event Report.
4. If possible, request that a neighbor witness your observations.
5. Do not use household taps.

II. SAMPLING OF INDOOR AIR

Ruth Winchester or Ryan Fielder will:

1. Call Miles Athey: (425) 334-3157.
2. If no answer from Miles Athey during business hours, call Stan Haskins at (425)251-5441.
3. Fill out the Event Report.
4. If possible, request that a neighbor witness your observations.
5. Ruth Winchester will close the restroom door and the restroom vent until Fluor Daniel GTI arrives. Ryan Fielder will leave his basement closed until Fluor Daniel GTI arrives.