



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

March 25, 2008

Ms. Rebecca k. Andresen
ARCADIS
2300 Eastlake Avenue East, Suite 200
Seattle, WA 98102

Dear Ms. Andresen:

RE: Agreed Order DE4460 – Unocal Edmonds Bulk Fuel Terminal, Second Schedule
Extension Request

Ecology approves your second schedule extension request as described in your letter to me of March 11, 2008 (attached). Ecology's approved your first schedule extension request in our letter dated October 10, 2007. This letter approves further amendment of the schedule presented in Section 6.3 of Exhibit B of Agreed Order DE 4460 and the amended schedule in your letter of March 11, 2008, is enforceable under that Order.

This schedule amendment extends the overall project schedule approximately one year.

Sincerely,

David L. South
Senior Engineer
Toxics Cleanup Program

cc: Katherine Chesick – WASHDOT
Richard Elliott – Davis Wright Tremaine
Kim Jolitz – Chevron EMC
Kynan Patterson – WASHDOT
Leslie Seffern – AGO
Ching-Pi Wang – Ecology
Bob Warren - Ecology





David L. South
Senior Engineer
Toxics Cleanup Program
Washington State Department of Ecology
Northwest Regional Office
3190 160th Avenue SE
Bellevue, WA 98008-5452

Subject:

Second Schedule Extension Request
Agreed Order No. DE92TC-N328
Unocal Edmonds Terminal
Edmonds, Washington

Dear Mr. South:

On behalf of Chevron Environmental Management Company (Chevron), ARCADIS U.S., Inc. (ARCADIS) is supervising implementation of the Lower Yard Interim Action at the former Unocal Edmonds Terminal. Mobilization to the site was initiated on July 30, 2007, and excavation activities began on August 13, 2007.

An extension request was submitted to the Department of Ecology (DOE) on October 4, 2007, and was approved in DOE correspondence dated October 10, 2007. Since inception of the project, approximately 111,000 tons of soil have been removed from the site. An additional 25,000 tons of soil are expected to be excavated to complete the first phase of remedial activities. Note that completion of three of the planned excavation areas has been deferred to coincide with the sediment removal from Willow Creek in Summer 2008 (Phase II). At the time of the first extension request (October 2007), soil removal was proceeding at a production rate approximately 39% greater than originally estimated. Phase I of the remedial activities is expected to be completed at 112% greater than the original estimate.

In addition to the significant increase in soil removed from the site, delays were encountered in December due to a 100-year rain event. The event itself, and it's aftermath both on and off the site limited off-site transport of excavated soil to only seven days in the month of December. Accordingly, an extension to the schedule is respectfully requested. Soil excavation activities are expected to last into March 2007, with the following assumptions:

Imagine the result

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Environmental

Date:

March 11, 2008

Contact:

Rebecca K. Andresen

Phone:

206.726.4717

Email:

Rebecca.Andresen@arcadis-us.com

Our ref:

B0045362

- Significant weather delays are not encountered
- Production continues at an average of 1,000 tons/day (fair-weather production is approximately 1,300 tons/day)

An additional extension is also requested for installation of the proposed monitoring wells. As discussed during our telephone conversation on February 12, 2008, Chevron would like to install the monitoring wells after the proposed excavation work is completed this summer in order to protect them from damage by the heavy equipment. The Washington State Department of Transportation (WASHDOT) has been contacted, and they have agreed that an additional extension of six months to the current schedule for groundwater monitoring will not adversely impact their plans for the site. The soil boring installations are still planned for Spring 2008 in order to determine if additional excavation will be required in the southwest lower yard area. When possible, remaining site activities will be conducted within the original proposed time frame. The proposed revised schedule is as follows:

| Activity | Completion Date |
|---|-----------------|
| Product Recovery and Soil Excavation | April 2008 |
| Southwest Lower Yard Assessment (soil borings) | May 2008 |
| Draft Work Plan for Additional Assessment Activities (if required) | May 2008 |
| Phase II of Interim Action Plan (sediment removal, completion of remaining excavations) | September 2008 |
| Draft Interim Action As-Built Report (Phase I) | December 2008 |
| Monitoring Well Installation | October 2008 |
| Groundwater Monitoring (1 st event*) | November 2008 |
| Draft Groundwater Sampling Report (November 2008-November 2009) | January 2010 |

| | |
|--|--------------|
| Interim Action As-Built Report – Sediment Remediation (Phase II) | April 2009 |
| Additional Investigation Report (if required) | May 2009 |
| Draft Groundwater Sampling Report (November 2009-November 2010) | January 2011 |

Notes: This schedule is arranged in the order the activities appear in the Agreed Order

* Groundwater sampling will be conducted semi-monthly for two years starting in November 2008

We appreciate your assistance with this matter. If you have any questions or require additional information, please feel free to contact me at 206.726.4717.

Sincerely,

ARCADIS U.S., Inc.



Rebecca K. Andresen, L.G.
Sr. Geologist I

Copies:

Kim Jolitz – Chevron EMC
Kynan Patterson – WASHDOT
Katherine Chesick - WASHDOT