

MEMORANDUM

Project No. AS230442A

August 14, 2024

To: Nick Acklam and Beth Kercher, Ecology Toxics Cleanup Program, ERO

From:



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Re: Addendum to Interim Action Sampling Plan, Stillwater Holdings Chevron UST and Soil Removal Action

This memorandum has been prepared as an Addendum to the Interim Action Sampling Plan for the UST and Soil Removal Action, prepared by Aspect Consulting and dated June 4, 2024 (SAP). The Addendum provides the information requested by the Washington State Department of Ecology (Ecology) in an August 7, 2024 email. An interim action is being performed at the Stillwater Holdings Chevron Site located at 7 East Rose Street in Walla Walla, Washington (Site; Figure 1). The interim action will include soil sampling and analysis beneath fuel system components, including fuel dispensers and conveyance piping, and soil management to remove up to 60 tons of petroleum-contaminated soil, if encountered. The SAP describes soil sample collection and handling procedures, the laboratory analytical approach, and stockpile sampling and disposal for the interim action. Additional details requested by Ecology are provided herein.

Soil Sampling and Analysis

There are three fuel dispensers, one under the western canopy and two under the eastern canopy, which are connected by conveyance piping that runs between the canopies (Figure 1). One test pit will be excavated under each fuel dispenser to a depth of 6 feet below ground surface (bgs) to observe soil conditions, conduct field screening and collect soil samples for laboratory analysis in accordance with the procedures described in the SAP. Soil samples will be collected from each test pit where field screening results indicate the highest degree of petroleum contamination (such as total volatile organic compound [VOC] concentrations in headspace vapor or heavy sheen) or from the total depth of the test pit if the field screening results do not indicate the presence of petroleum hydrocarbons.

In addition, soil conditions beneath the conveyance piping will be observed as the piping is removed from the ground and field screening will be completed in accordance with the procedures described in the SAP. If the results of field screening identify the potential presence of petroleum hydrocarbons in soil underlying the conveyance piping, the piping bedding will be removed to

access the underlying soil and a soil sample will be collected for laboratory analysis in accordance with the procedures described in the SAP. If there are no field screening indications of petroleum hydrocarbons in soil beneath the conveyance piping, one sample of underlying soil will be collected from the approximate location shown on Figure 1 for laboratory analysis.

One soil sample collected from each test pit and up to two soil samples from beneath the conveyance piping will be submitted for laboratory analysis in accordance with the analytical approach described in the SAP.

Soil Stockpile Sampling and Disposal

Soil excavated from exploratory test pits beneath the fuel dispensers and from beneath the conveyance piping will be handled in accordance with Ecology's Guidance for Remediation of Petroleum-Contaminated Sites (Ecology, 2016¹). The results of field screening will be used to segregate soil that contains petroleum-like odors, elevated VOC concentrations in headspace vapor, or heavy sheen from clean soil. The segregated soil will either be direct loaded into trucks for transport or temporarily stored in a stockpile on the Stillwater Holdings property pending laboratory analysis for waste profiling and disposal acceptance. The stockpile sampling and disposal procedures are described in the SAP.

Limitations

Work for this project was performed for Stillwater Holdings, LLC (Client), and this memorandum was prepared in accordance with generally accepted professional practices for the nature and conditions of work completed in the same or similar localities, at the time the work was performed. This memorandum does not represent a legal opinion. No other warranty, expressed or implied, is made.

All reports prepared by Aspect Consulting for the Client apply only to the services described in the Agreement(s) with the Client. Any use or reuse by any party other than the Client is at the sole risk of that party, and without liability to Aspect Consulting. Aspect Consulting's original files/reports shall govern in the event of any dispute regarding the content of electronic documents furnished to others.

Attachments: Figure 1 – Site Map Showing Fuel Dispenser and Conveyance Piping
Sample Locations

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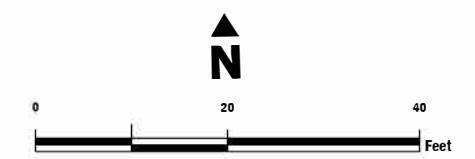
¹ Washington State Department of Ecology (Ecology), 2016, Guidance for Remediation of Petroleum Contaminated Sites, Publication No. 10-09-057, June 2016.



- Test Pit
- Boring
- Monitoring Well
- Decommissioned Monitoring Well
- Sump
- Storm Manhole
- Catch Basin
- Bubble Up Catch Basin
- Sewer Line
- Storm Line
- Water Line
- Gas Line
- Petroleum Line
- Electrical Line
- Telephone Line
- Overhead Power Line
- Unknown Buried Utility
- Limits of Temporary Shoring
- Property Boundary
- Walla Walla Tax Parcel
- Proposed Sample Locations

Notes:

- On-property utility locations from 1/22/2024 survey provided by PBS Engineering and Environmental.
- Offproperty utility locations approximate from map provided by the City of Walla Walla.
- Monitoring Well locations from survey provided by PBS Engineering and Environmental.
- Decommissioned monitoring well locations approximate from Plateau Geoscience Group Quarterly Monitoring Report, Sept 2012.
- Sump locations approximate from map provided by Clean Harbors.
- Parcel boundaries from County of Walla Walla GIS.
- Mill Creek boundary from WADNR GIS.



Site Map Showing Fuel Dispenser and Conveyance Piping Sample Locations

Stillwater Holdings Chevron
Walla Walla, Washington

	APR-2024	BY DIM / NLK	FIGURE NO. 1
	PROJECT NO. 230442	REVISED BY ---	

Data source credits: None | Basemap Service Layer Credits: NA

PROJECT: 230442 - Fuel Dispenser and Conveyance Piping Sample Locations | DATE: 4/22/2024