

October 1, 2024

Mr. Joseph B Hunt VCP Project Manager/Hydrogeologist Toxics Cleanup Program – Southwest Region Washington Department of Ecology P.O. Box 47775 Olympia, Washington 98504-7775 johu461@ecy.wa.gov

Project: Confirmation Soil Sampling Work Plan Starbucks Diesel Release 2013 East 1<sup>st</sup> Street Port Angeles, WA 98362 VCP No. SW1835

Dear Mr. Hunt:

AEG Atlas, LLC (AEG) appreciates the opportunity to submit this Work Plan for confirmation soil sampling at the *Starbucks Diesel Release* property, located at the above-referenced address in Port Angeles, Washington (Site). The scope of work includes advancing up to three soil borings for the purpose of collecting soil samples to evaluate whether the release outlined in the Washington State Department of Ecology (Ecology) No Further Action Likely opinion, dated August 23, 2024, was sufficiently cleaned up.

## Site Investigation

AEG proposes to advance up to three soil borings at the Site up to 15 feet below ground surface (bgs) to investigate potential residual impacts to soil. Borings are proposed to be located as follows:

- One boring will be advanced within the area of previous excavation sample locations SL-02 and SL-04.
- One boring will be advanced about 20 feet north of previous excavation sample locations SL-02 and SL-04.
- A third boring will used as a contingency if visual or olfactory evidence of contamination is noted in either of the other borings to ensure the impacts are defined. If no evidence of contamination is present in either of the first two borings, the third boring will not be advanced.

Proposed boring locations are illustrated on the attached figures.



Specific tasks associated with these activities include the following:

- Conduct a Site visit to mark for utilities, and arrange for public and private utility locates.
- Provide oversight during the advancement of up to three soil borings up to 15 feet bgs using a direct-push drill rig.
- Continuously log subsurface media during advancement of the soil borings. Soil will be observed to document soil lithology, color, moisture content, and sensory evidence of impairment. Soil samples will be classified in the field and field-screened utilizing a photoionization detector (PID) to facilitate the selection of appropriate soil samples to be submitted to the analytical laboratory.
- Collect soil samples from 5, 10, and 15 feet bgs in each of the borings in laboratoryprovided containers. The containers will be labeled and placed in a portable chilled ice chest and transported to the laboratory following standard chain-of-custody procedures.
- Submit the samples to a Washington State-accredited analytical laboratory for analysis for the following parameters:
  - Gasoline-range petroleum hydrocarbons (TPH) using Northwest Method NWTPH-Gx.
  - Diesel- and oil-range TPH using Northwest Method NWTPH-Dx Extended with silica gel cleanup.
  - Model Toxics Control Act (MTCA) volatile organic compounds (VOCs), including benzene, toluene, ethylbenzene, and xylenes (BTEX), ethylene dibromide (EDB), 1,2dichloroethane (EDC), methyl tert-butyl ether (MTBE), and naphthalene, using EPA Method 8260.
- Archive remaining samples at the laboratory for possible future analysis, pending analytical results, and subject to sample holding time requirements.
- Appropriately store investigation-derived waste (IDW) on Site in U.S. Department of Transportation-approved 55-gallon drums, and adequately labelled pending disposal.

AEG will evaluate the data collected as compared to MTCA Method A cleanup levels, and draft a short report summarizing the data collected. AEG will submit the report to Ecology and enter the data into Ecology's Environmental Information Management (EIM) database.

Ecology's opinion letter indicates a request to specify the surface datum that will be used and how that will correlate to the prior SL-2 and SL-04 sample depths. It is AEG's understanding the Site has already been redeveloped into a commercial center that includes a Chipotle restaurant with a new asphalt-paved parking lot. AEG intends to use the new ground surface (asphalt parking lot) as the datum the soil sample depths will correspond to, and will be advancing the borings up to the current point of compliance of 15 feet bgs. As stated above, and per Ecology's opinion letter, soil



samples will be collected from each boring at 5, 10, and 15 feet bgs. However, those depths may be adjusted in the field if visual or olfactory evidence of contamination is noted in any of the soil cores. It is AEG's professional opinion that this approach will be sufficient to demonstrate whether any residual impacts are present.

## Field Sampling Methodology

Soil sampling for VOCs and field preservation methods will follow methods set forth by Ecology's Implementation Memorandum #5, "*Collecting and Preparing Soil Samples for VOC Analysis*", which requires the use of EPA Method 5035A to minimize VOC losses during sample collection. Soil samples will be collected from the soil borings via continuous soil cores in an acetate sleeve inside the drilling rod's core barrel. Soils will be observed to document soil lithology, color, moisture content, and sensory evidence of contamination.

Soil samples will be collected in laboratory-provided containers for the analytes listed above. Upon sampling, all samples will immediately be placed into chilled ice chests (approximately 4 degrees Celsius) and transported for analysis under standard chain-of-custody procedures to a Washington State-accredited analytical laboratory.

## Schedule

AEG is prepared to schedule the drilling subcontractor following approval of this work plan. This schedule can be impacted by factors outside the control of AEG, including changes in project information material to the analysis. Should changes occur, AEG will notify the Client if these changes affect the schedule.

Sincerely,

Scott Rose, L.H.G. Director of Technical Services



Attached:Figure 2, Site Plan – KrazanFigure 3, Excavation and Building Location Map – Zenovic & Associates



