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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office
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December 31, 2024

Samuel Miles
Arcadis U.S., Inc.
1100 Olive Way, Suite 800
Seattle, WA 98101
(samuel.miles@arcadis.com)

Re: 2024 Request for Modifications to the Groundwater Monitoring Plan, Former Chevron Bulk Plant No. 100-1327

Dear Samuel Miles:

Thank you for submittal of the Request for Modifications regarding groundwater monitoring activities at the Former Chevron Bulk Plant No. 100-1327 cleanup site.

Arcadis, on behalf of Chevron Environmental Management Company (CEMC) and King County Metro Transit Department (King County or Metro), requested a modification to the current Site monitoring plan in a letter dated August 19, 2024. The modifications include reduction of the number of wells sampled, changes to the analytical suite, and changes to the frequency of sampling and reporting.

Twenty wells are present at the North Yard, South Yard, and right-of-way portions of the Site. Currently, all twenty wells are gaged, and eleven compliance wells are sampled on a semiannual basis. Groundwater analytes include petroleum constituents (benzene, toluene, ethylbenzene, and naphthalene), carcinogenic polycyclic aromatic hydrocarbons (cPAHs), and the metals lead and arsenic.

The current arsenic cleanup level established in the Consent Decree is 0.0982 ug/l, based on protection of surface water. However, the established cleanup level is below laboratory practical quantitation levels/detection limits, as well as below the arsenic natural background level of 8 ug/l established in Ecology's 2022 study *Natural Background Groundwater Arsenic Concentrations in Washington State*.

Ecology approves some of the requested changes to the monitoring plan, as summarized below:

- Site arsenic cleanup level can be increased to 8 ug/l, consistent with the Puget Sound natural background concentration (Ecology, 2022)

- Sampling can be discontinued at wells MW-4, MW-8A, MW-19, MW-20, MW-25, MW-26, and MLU-1;
- Continue sampling MW-7 for petroleum constituents and arsenic, but the other analytes can be discontinued
- Continue sampling MW-21 for arsenic, but the other analytes can be discontinued
- Continue sampling AGI-2 for petroleum constituents, lead, and arsenic, but the other analytes can be discontinued; and
- Continue sampling MLU-3 for lead, but the other analytes can be discontinued.

Ecology does not approve the request to reduce the monitoring frequency from semi-annual to annual. Continue monitoring on a semi-annual basis.

Ecology requests that groundwater compliance samples be analyzed for both total and dissolved metals, since MTCA cleanup levels are based on total metals concentrations (as noted in Ecology's 2023 Periodic Review, among other potential concerns and recommendations).

Additionally, the Site shall continue to be maintained and monitored in accordance with established institutional controls and Site covenants.

Ecology appreciates the PLP team's continued diligence on this project, and we appreciate their efforts in remediation and management of this Site. Please feel free to contact me by phone at (425) 324-1438 or by email at vance.atkins@ecy.wa.gov if you have questions about this letter.

Sincerely,



Vance Atkins, LG, LHG
Hydrogeologist 4
Toxics Cleanup Program, NWRO

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