

Ecopsy



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 20, 2025

James P. Kiernan, P.E.
Operations Lead – West
Chevron Environmental Management
Company
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Shamsher Singh
Candid Travel Center Land LLC
Exit 59 Food and Fuel LLC
464 Oregon Way
Longview, WA 98632-1446
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Re: Comments on Revised Draft Engineering Design Report

- **Site Name:** Cowlitz Food & Fuel (Also known as Former Texaco Service No. 211556)
- **Site Address:** 101 Mulford Rd, Toledo, Lewis County, WA 98591
- **Agreed Order:** DE 5236
- **Facility/Site No.:** 1166
- **Cleanup Site ID No.:** 7025

Dear James P. Kiernan and Shamsher Singh:

Thank you for submitting the Revised Draft Engineering Design Report (EDR) and the associated Response to Comments table for Washington State Department of Ecology (Ecology) review.¹ The scope of this review is to evaluate whether the EDR components, if properly constructed, can be expected to meet the cleanup standards set in the Cleanup Action Plan (CAP).² The organizations that issue permits or provide substantive requirements will perform the other necessary reviews. Please revise the EDR to incorporate the following comments and then resubmit for our review within 30 days of the date of this letter:

- a) Thank you for incorporating Ecology's comments 1, 2, 4, 5, 6, 9, 10, 11, 12, 13, and 14 in the revised EDR.
- b) **Ecology comment 3:** The Response to Comments table indicates that the change was made. However, the change was not made on Sheet 9, note 5. Please make the requested change.
- c) **Ecology comments 7 and 8:** Comment noted.

¹ Arcadis and Chevron Environmental Management Company, 2024, Revised Draft Engineering Design Report, Cowlitz Food & Fuel Site, 101 Mulford Road, Toledo, Washington, October 24.

² Ecology, 2024, Cowlitz Food and Fuel, Cleanup Action Plan, May 14.

- d) **Appendix E, Sampling & Analysis Plan/Quality Assurance Project Plan:** Section 2.4 states that there will be no identifying markers of duplicate samples. However, Section 2.5 states that field duplicate samples will be given the prefix "DUP-." Please revise Section 2.5 so that it is consistent with the text in Section 2.4 that samples will be "blind" as to if they are a duplicate.
- e) **Appendix E, Tables 3-1 and 3.2:** To be consistent with the Cleanup Action Plan, please add a footnote stating that diesel-range organics (DRO) and heavy-oil range organics (HRO) fractions in soil and groundwater samples will be added together and compared against the DRO MTCA Method A Cleanup Level in accordance with Toxics Cleanup Program Implementation Memorandum #4 (Ecology 2004).³
- f) **Appendix E, Table 3.2:** Ecology (2016) guidance recommends that the groundwater reporting limit for the NWTPH-Dx Method be at least 250 micrograms per liter (µg/L) for DRO.⁴ However, the reporting limit shown in Table 3-2 for DRO is 450 µg/L. Please revise the table so that the reporting limit for DRO is less than or equal to 250 µg/L.
- g) **Appendix E, Section 3.11, Data Validation and Verification:** Please add to this section that analytical data verification and validation shall be performed in general conformance with current EPA National Functional Guidelines for Data Review and Ecology (2024).⁵

If you have any questions about this letter, please contact me at (360) 890-0059 or steve.teel@ecy.wa.gov.

Sincerely,



Steve Teel, LHG
Cleanup Project Manager/Hydrogeologist
Toxics Cleanup Program
Southwest Region Office

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Ecology Site File

³ Ecology, 2004, Determining Compliance with Method A Cleanup Levels for Diesel and Heavy Oil, Toxics Cleanup Program Implementation Memorandum #4, June 17.

⁴ Ecology, 2016, Guidance for Remediation of Petroleum Contaminated Sites, Toxics Cleanup Program Publication No. 10-09-057, June.

⁵ Ecology, 2024, Establishing Ecology Guidelines for Verification and Validation of Chemical Data. Publication No. 24-03-023, September.