



**Stantec Consulting Services Inc.**  
1687 114<sup>th</sup> Avenue Southeast, Suite 100  
Bellevue WA 98004

April 9, 2025

Project 203723786.L02

**Mr. Jason Cook**

Washington State Department of Ecology  
Toxic Cleanup Program  
P.O. Box 47600  
Olympia, Washington 98504-7600

**Reference: Cost Estimate for Compliance Monitoring Plan, ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, Washington, Ecology Facility Site ID 2728**

Mr. Cook,

At the request of ExxonMobil Environmental and Property Solutions, on behalf of ExxonMobil Oil Corporation (ExxonMobil) and American Distributing Company (ADC), Stantec Consulting Services Inc. (Stantec) conducts environmental activities at the ExxonMobil ADC site (Site). Stantec prepared this *Cost Estimate for Compliance Monitoring Plan*, dated April 9, 2025, at the request of the Washington State Department of Ecology (Ecology).

**Site Identification**

Consent Decree No. 24-2-01561-31  
Facility Site ID No. 2728  
Cleanup Site ID No. 5182

**Ecology Contacts**

Washington State Department of Ecology  
Toxic Cleanup Program – Headquarters  
P.O. Box 47600  
Olympia, Washington 98504-7600

**Site Location**

2717 and 2731 Federal Avenue  
Everett, Washington 98201  
Port Gardner / Possession Sound

Mr. Jason Cook  
Site Manager  
Phone: (360) 763-2777  
Email: [jason.cook@ecy.wa.gov](mailto:jason.cook@ecy.wa.gov)

In accordance with the Consent Decree, an estimate of all costs associated with the operation and maintenance of the remedial action at the Site, including institutional controls, compliance monitoring, and corrective measures, must be provided to Ecology within sixty (60) days of the completion of the remedial action. This is a budgetary estimate that represents the current cost of the work scope as described in Stantec's *Compliance Monitoring Plan*, dated April 9, 2025 for the Site (Stantec, 2025).

An estimate of costs associated with the operation and maintenance of the remedial action at the Site, including institutional controls, compliance monitoring, and corrective measures, is provided in Table 1. The budgetary estimate is broken down by year of work completion, tasks within that year, and subtasks



## Cost Estimate for Compliance Monitoring Plan

ExxonMobil ADC

for clarity. Sales tax is generally not applicable to the tasks and subtasks included in this budgetary estimate with the exception of tasks associated with drilling contractors (well installation and soil sampling). This budgetary estimate was compiled without considering the effects of inflation or the time value of money (discounting for net present value). Future annual revisions to this budgetary estimate, in accordance with the Consent Decree, will either incorporate Ecology's Inflation Factor or be revised task by task using updated costs from subcontractors.

Additionally, with the exception of subtasks for potential asphalt repairs in Years 10, 20, 30, 40, and 50, no contingency is reflected in this budgetary estimate. The work scope as described in the *Compliance Monitoring Plan* for the Site (Stantec, 2025) is a fixed scope and will not grow over time. In fact, the work scope is expected to shrink over time as natural attenuation works to reduce petroleum hydrocarbon concentrations in soil and groundwater across the site and sampling locations are selectively eliminated from the sampling regimen upon meeting cleanup standards. Elimination of sampling locations over time will produce a greater cost savings than the Ecology-recommended contingency. Further, this budgetary estimate is subject to annual review and update in accordance with the Consent Decree, providing regular opportunities to revise costs for unforeseen changes.

A summary of the yearly totals and anticipated work scopes for that year is provided below. Details of costs associated with individual tasks and subtasks within each year is provided in Table 1.

Compliance Monitoring Cost Estimate		
Time Period	Event	Estimated Total Cost
Year 1	Initial Soil Sampling (Direct-Push)	\$144,000
	Well Installation (Hollow-Stem Auger)	
	CPOC Confirmation Sampling (Four Quarterly Events)	
	MNA Groundwater Sampling (Four Quarterly Events)	
	Covenant Inspection	
Year 2	CPOC Confirmation Sampling (Four Quarterly Events)	\$31,000
Year 5	MNA Groundwater Sampling	\$17,000
	Covenant Inspection	
Year 10	MNA Groundwater Sampling	\$64,000
	MNA Soil Sampling	
	Covenant Inspection and Asphalt Repairs, as needed	
Year 15	MNA Groundwater Sampling	\$17,000
	Covenant Inspection	
Year 20	MNA Groundwater Sampling	\$64,000
	MNA Soil Sampling	
	Covenant Inspection and Asphalt Repairs, as needed	
Year 25	MNA Groundwater Sampling	\$17,000
	Covenant Inspection	



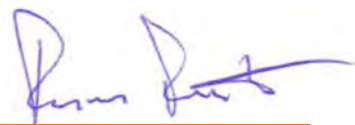
**Cost Estimate for Compliance Monitoring Plan**  
ExxonMobil ADC

Compliance Monitoring Cost Estimate		
Time Period	Event	Estimated Total Cost
Year 30	MNA Groundwater Sampling	\$64,000
	MNA Soil Sampling	
	Covenant Inspection and Asphalt Repairs, as needed	
Year 35	MNA Groundwater Sampling	\$17,000
	Covenant Inspection	
Year 40	MNA Groundwater Sampling	\$64,000
	MNA Soil Sampling	
	Covenant Inspection and Asphalt Repairs, as needed	
Year 45	MNA Groundwater Sampling	\$17,000
	Covenant Inspection	
Year 50	MNA Groundwater Sampling	\$64,000
	MNA Soil Sampling	
	Covenant Inspection and Asphalt Repairs, as needed	
TOTAL:		\$580,000

Please contact me using the contact information listed below.

Regards,

**Stantec Consulting Services Inc.**



**Ryan Pozzuto**  
Project Manager  
Phone: (206) 575-1527  
ryan.pozzuto@stantec.com

Attachment: Table 1 Compliance Monitoring Cost Estimate

Reference: Stantec Consulting Services Inc. (Stantec). April 9, 2025. *Compliance Monitoring Plan, ExxonMobil ADC, 2717/2731 Federal Avenue, Everett, Washington, Ecology Facility Site ID 2728.*

- c. Mr. Steve Miller, American Distributing Company  
Mr. Jeff Johnson, ExxonMobil Environmental and Property Solutions Company



**TABLE 1**  
**COMPLIANCE MONITORING COST ESTIMATE**  
ExxonMobil ADC  
2717/2731 Federal Avenue  
Everett, Washington  
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<b>Compliance Monitoring Cost Estimate</b>		
<b>Time Period</b>	<b>Event</b>	<b>Estimated Costs</b>
Year 1	Initial Soil Sampling (Direct-Push)	\$30,000
	Subcontractors	\$15,000
	Fieldwork Oversight	\$12,000
	Laboratory Analysis	\$3,000
	Well Installation (Hollow-Stem Auger)	\$32,000
	Subcontractors	\$20,000
	Fieldwork Oversight	\$12,000
	CPOC Confirmation Sampling (Four Quarterly Events)	\$27,000
	Fieldwork (per event)	\$6,000
	Laboratory Analysis (per event)	\$750
	MNA Groundwater Sampling (Four Quarterly Events)	\$48,000
	Fieldwork (per event)	\$10,000
	Laboratory Analysis (per event)	\$2,000
Year 2	Covenant Inspection	\$1,000
	Report Generation	\$6,000
	Year 1 Subtotal	\$144,000
	CPOC Confirmation Sampling (Four Quarterly Events)	\$27,000
	Fieldwork (per event)	\$6,000
	Laboratory Analysis (per event)	\$750
	Report Generation	\$4,000
	Year 2 Subtotal	\$31,000
Year 5	MNA Groundwater Sampling	\$12,000
	Fieldwork	\$10,000
	Laboratory Analysis	\$2,000
	Covenant Inspection	\$1,000
	Report Generation	\$4,000
	Year 5 Subtotal	\$17,000
Year 10	MNA Groundwater Sampling	\$12,000
	Fieldwork	\$10,000
	Laboratory Analysis	\$2,000
	MNA Soil Sampling	\$30,000
	Subcontractors	\$15,000
	Fieldwork Oversight	\$12,000
	Laboratory Analysis	\$3,000
	Covenant Inspection and Asphalt Repairs, as needed	\$17,000
	Inspection	\$1,000
	Repairs	\$16,000
	Report Generation	\$5,000
	Year 10 Subtotal	\$64,000

**TABLE 1**  
**COMPLIANCE MONITORING COST ESTIMATE**  
ExxonMobil ADC  
2717/2731 Federal Avenue  
Everett, Washington  
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<b>Compliance Monitoring Cost Estimate</b>		
<b>Time Period</b>	<b>Event</b>	<b>Estimated Costs</b>
Year 15	MNA Groundwater Sampling	\$12,000
	Fieldwork	\$10,000
	Laboratory Analysis	\$2,000
	Covenant Inspection	\$1,000
	Report Generation	\$4,000
	Year 15 Subtotal	\$17,000
Year 20	MNA Groundwater Sampling	\$12,000
	Fieldwork	\$10,000
	Laboratory Analysis	\$2,000
	MNA Soil Sampling	\$30,000
	Subcontractors	\$15,000
	Fieldwork Oversight	\$12,000
	Laboratory Analysis	\$3,000
	Covenant Inspection and Asphalt Repairs, as needed	\$17,000
	Inspection	\$1,000
	Repairs	\$16,000
	Report Generation	\$5,000
	Year 20 Subtotal	\$64,000
Year 25	MNA Groundwater Sampling	\$12,000
	Fieldwork	\$10,000
	Laboratory Analysis	\$2,000
	Covenant Inspection	\$1,000
	Report Generation	\$4,000
	Year 25 Subtotal	\$17,000
Year 30	MNA Groundwater Sampling	\$12,000
	Fieldwork	\$10,000
	Laboratory Analysis	\$2,000
	MNA Soil Sampling	\$30,000
	Subcontractors	\$15,000
	Fieldwork Oversight	\$12,000
	Laboratory Analysis	\$3,000
	Covenant Inspection and Asphalt Repairs, as needed	\$17,000
	Inspection	\$1,000
	Repairs	\$16,000
	Report Generation	\$5,000
	Year 30 Subtotal	\$64,000
Year 35	MNA Groundwater Sampling	\$12,000
	Fieldwork	\$10,000
	Laboratory Analysis	\$2,000
	Covenant Inspection	\$1,000
	Report Generation	\$4,000
	Year 35 Subtotal	\$17,000

**TABLE 1**  
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2717/2731 Federal Avenue  
Everett, Washington  
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<b>Compliance Monitoring Cost Estimate</b>		
<b>Time Period</b>	<b>Event</b>	<b>Estimated Costs</b>
Year 40	MNA Groundwater Sampling	\$12,000
	Fieldwork	\$10,000
	Laboratory Analysis	\$2,000
	MNA Soil Sampling	\$30,000
	Subcontractors	\$15,000
	Fieldwork Oversight	\$12,000
	Laboratory Analysis	\$3,000
	Covenant Inspection and Asphalt Repairs, as needed	\$17,000
	Inspection	\$1,000
	Repairs	\$16,000
	Report Generation	\$5,000
	Year 40 Subtotal	\$64,000
Year 45	MNA Groundwater Sampling	\$12,000
	Fieldwork	\$10,000
	Laboratory Analysis	\$2,000
	Covenant Inspection	\$1,000
	Report Generation	\$4,000
	Year 45 Subtotal	\$17,000
Year 50	MNA Groundwater Sampling	\$12,000
	Fieldwork	\$10,000
	Laboratory Analysis	\$2,000
	MNA Soil Sampling	\$30,000
	Subcontractors	\$15,000
	Fieldwork Oversight	\$12,000
	Laboratory Analysis	\$3,000
	Covenant Inspection and Asphalt Repairs, as needed	\$17,000
	Inspection	\$1,000
	Repairs	\$16,000
	Report Generation	\$5,000
	Year 50 Subtotal	\$64,000
<b>TOTAL:</b>		<b>\$580,000</b>

**Notes:**

This is a budgetary estimate that represents the current cost of the work scope as described in the *Draft Compliance Monitoring Plan* for the Site (Stantec, 2025).

Sales tax is generally not applicable to the tasks and subtasks included in this budgetary estimate with the exception of tasks associated with drilling contractors (well installation and soil sampling).

This budgetary estimate was compiled without considering the effects of inflation or the time value of money (discounting for net present value).

Future annual revisions to this budgetary estimate, in accordance with the Consent Decree, will either incorporate Ecology's Inflation Factor or be revised task by task using updated costs from subcontractors.

Additionally, with the exception of subtasks for potential asphalt repairs in Years 10, 20, 30, 40, and 50, no contingency is reflected in this budgetary estimate.