2006 INTERIM REMEDIAL MEASURES WORK PLAN FOR THE BEE-JAY SCALES SITE FOR

CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY & BP AMERICA, INC.

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1.0 INTRODUCTION

This document presents the 2006 Interim Remedial Measures Work Plan prepared by SECOR International Incorporated (SECOR) on behalf of Chevron Environmental Management Company (CEMC) and BP America (BP) for the Bee-Jay Scales Site in Sunnyside, Washington (the Site). This project is being implemented in accordance with the Washington State Department of Ecology (Ecology) Model Toxics Control Act (MTCA) and Agreed Order No. DE 02TCPCR-3932.

1.1 PURPOSE AND OBJECTIVES

The purpose of this document is to present a work plan detailing the specific procedures to be implemented at the Site for the Interim Remedial Measures (IRM) in 2006. The specific objectives for the IRM program are defined as:

- Close the lined lagoon, provide treatment of the lagoon area, and clear debris in the immediate area;
- Provide treatment for benzene and total petroleum hydrocarbon (TPH) impacts detected in Area 3.

The IRM program will address these areas of importance to provide immediate control and mitigate further migration at the source.

1.2 REPORT ORGANIZATION

The remaining sections of this report are organized as follows:

- A summary of the Site background and historical operation is included in the remaining portion of Section 1;
- A summary of previous investigations and groundwater modeling results is included in Section 2;
- The IRM work scope is included in Section 3;
- The schedule for implementation of the IRM activities is presented in Section 4.

1.3 BACKGROUND

The Site is located in the city of Sunnyside, Washington, within Yakima County, and is composed of two property parcels: Parcel No. 22102522014 and Parcel No. 22102522015, as recorded by the Yakima County Department of Assessment. Parcel No. 22102522014 is located at 116 North 1st Street, and is owned by Bee-Jay Scales, Inc. Parcel No. 22102522015 is located at 301 Warehouse Avenue, and is owned by Hickenbottom & Sons, Inc. Hickenbottom & Sons also owns additional, contiguous property on which their business is

located. The Site Location Map is included as Figure 1, and the General Site Layout (including building locations) is shown as Figure 2.

The Site and adjacent properties have been the location of agricultural warehouses, lumber yards, coal storage, and railroad transportation activities since approximately 1906. Portions of the Site were owned by the Northern Pacific Railroad Company from 1906 until 1989, when purchased by the Glacier Park Company. An agricultural distribution facility operated at the Site from the 1960s through at least 1986. This facility consisted of buildings and aboveground storage tanks (ASTs), and was operated by at least two separate companies: Laneger Agricultural Services and Valley Agricultural Inc. Documentation also indicates that during the 1970s American Oil Company, now known as BP, leased portions of this property from Northern Pacific Railroad. The ASTs have since been removed from the Site. A lagoon was constructed by Valley Agricultural Inc. in the early 1980s to collect water from the wash-down of farm chemical applicator vehicles.

The western portion of Lot 10 was purchased by the Chevron Chemical Company in 1981 and sold to Bee-Jay Scales, Inc. in 1987. Bee-Jay Scales, Inc. purchased additional portions of Lots 10 and 11 in 1995 and 1996. Hickenbottom & Sons leased a portion of the Site from the Northern Pacific Railroad Company beginning in 1961 and purchased portions of Lots 10 and 11 in 1992. The Hickenbottom property was previously used as pastureland and has been used for food packing, storage, and a transportation business since 1961.

Three businesses currently operate at the Bee-Jay Scales portion of the property: Sandy Farms, a local trucking company; Sanleco, Inc., an interstate trucking company with an on-site tractor-trailer repair garage; and Bee-Jay Scales, a commercial scale operation.

Hickenbottom & Sons, Inc. is a food-processing and distribution company. Most of Hickenbottom & Sons' current operation consists of a refrigeration warehouse. The Hickenbottom property that makes up a portion of the Site is currently leased to the Johnson Fruit Company and is used to store produce bins, pallets, tractor-trailer rigs, and other miscellaneous equipment. The remainder of the Hickenbottom & Sons property is used for tractor-trailer and produce storage, as well as transportation.

2.0 PREVIOUS INVESTIGATIONS AND GROUNDWATER MODELING RESULTS

Several investigations and evaluations have already been conducted by SECOR at the Site. The results of these previous investigations are included in the following reports and memoranda:

- *Phase I Remedial Investigation Report* (SECOR, October 2003);
- *Phase II Remedial Investigation Report* (SECOR, May 2005);
- Quarterly groundwater monitoring (documented in the *Final Quarterly Groundwater Monitoring Technical Memorandum* [SECOR, August 2004], *Third Quarter 2005 Groundwater Monitoring and Sampling Report* [SECOR, November 2005], and *Fourth Quarter 2005 Groundwater Monitoring and Sampling Report* [SECOR, March 2005]);
- Bench-scale treatability testing and field pilot study (documented in the *Phase II Remedial Investigation Report*);
- BIOSCREEN modeling (documented in the *Nitrate Fate and Transport Modeling Memorandum* [SECOR, June 2005]); and
- *Preliminary Screening of Remedial Alternatives Technical Memorandum* (SECOR, November 2005).

The following subsections summarize the key findings of each investigation and evaluation.

2.1 PHASE I REMEDIAL INVESTIGATION

The Phase I RI activities were conducted in July 2003 and consisted of soil and groundwater investigations.

SECOR collected soil samples from borings installed in each of the six identified areas (Figure 2). Groups of chemical parameters for the soil sampling plan were defined as follows:

- Conventional A parameters: ammonia, nitrite, nitrate, phosphate, sulfate, chloride, pH, and moisture content;

- Conventional B parameters: total organic carbon (TOC), grain size distribution, and void ratio/porosity;

- Conventional C parameters: agronomic analyses including extractable cations; sodium bicarbonate; cation exchange capacity (CEC); diethylenetriaminepentaacetic acid (DTPA)-available iron, manganese, zinc, and copper; electrical conductivity in saturated paste (ECe); calcium, magnesium, sodium, and chloride in saturation extract; and void ratio.

In addition to the Conventional A, B, and C parameters, soil samples were analyzed for pesticides, herbicides, metals, total petroleum hydrocarbon (TPH)-Gx, TPH-Dx, volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs).

Results indicated a TPH-Gx value exceeded Method C Cleanup Levels (CULs) at a depth of 7.5 feet below ground surface (bgs) at A3-SB-002. Also, nitrogen and sulfate compounds were present throughout the unsaturated zone soil samples at high concentrations in potential surface source areas.

Three, two-inch diameter shallow wells were installed at the Site as part of the Phase I groundwater investigation (MW-5, MW-6, and MW-7). The groundwater investigation included sampling of this newly expanded monitoring well network (MW-1, MW-3 through MW-7). Monitoring well locations are shown on Figure 3.

Groups of chemical parameters for the groundwater sampling plan were defined as follows:

- Conventional A parameters: ammonia, nitrite, nitrate, phosphate, sulfate, chloride, and pH; and

- Conventional B parameters: TOC, total suspended solids (TSS), total dissolved solids (TDS), hardness, and alkalinity.

Groundwater samples were analyzed for Conventional A parameters, Conventional B parameters, TPH-HCID, VOCs, SVOCs, pesticides, herbicides, and metals. The constituents requiring further evaluation based on the Phase I RI results were: 1,2-dichloropropane, arsenic, total nitrates and nitrites, sulfate and iron. Quarterly groundwater monitoring was continued at the Site, as detailed in Section 2.3.

Groundwater at the Site was encountered at depths ranging from approximately 7.4 to 11.9 feet bgs during the Phase I investigation, and the groundwater flow direction was determined to be southeasterly. The estimated average hydraulic conductivity of the water-bearing zone beneath the Site, based on slug tests conducted on all six monitoring wells during Phase I activities, was 5.23E-04 feet per second (ft/s) (1.59E-02 cm/s). The estimated hydraulic conductivity ranged from 8.44E-06 to 2.67E-03 ft/s (2.57E-04 to 8.12E-02 cm/s).

Consideration of the soil leaching to groundwater pathway was concentrated around the constituents identified above MTCA Method C CULs or secondary Maximum Contaminant Levels (MCLs) in the groundwater investigation. A brief summary of the findings is provided below:

- 1,2-Dichloropropane was not detected in soil at the Site, indicating Site soils are not the source of its detection at MW-4;

- Arsenic concentrations in soil were less than, or just above, it's background concentration. Arsenic was further evaluated in the Phase II groundwater investigation;

- The soil data suggested an aboveground source of stored fertilizer that had leached nitrogen compounds (nitrates, nitrites, and ammonia) to the soil. The major nitrogen source area appears to be directly east of the Dry Fertilizer Manufacturing Building in Area 2, and two source areas appear to be located adjacent to the lagoon;

- The potential source areas for sulfate were consistent with identified nitrogen source areas, indicating sulfate may be a component in the fertilizer blends released at the Site; and

- Iron was present in the surface soils at levels below the natural background concentration. These concentrations may be contributing to the presence of iron in groundwater.

2.2 PHASE II REMEDIAL INVESTIGATION

The Phase II activities at the Site included a soil investigation, groundwater investigation, surface water/sediment investigation, and pump testing for hydraulic conductivity.

SECOR conducted the Phase II soil investigation in May 2004. Soil samples were collected from borings installed in Areas 3 and analyzed for TPH-Gx. Soil samples were also collected borings installed in Area 5 and analyzed for ammonia, iron, nitrates, nitrites, phosphate, and sulfate. Ten of the soil samples from Area 5 were selected for synthetic precipitate leaching procedure (SPLP) analysis following nitrogen compound analysis to more accurately evaluate the soil leaching to groundwater pathway.

The Phase II groundwater investigation consisted of the installation of vertical profile borings and permanent monitoring wells. A total of eighteen temporary monitoring wells were installed in vertical profile boreholes for groundwater sample collection at depths of 10 and 20 feet bgs. The vertical profile borings were installed in Area 1, Area 5, and Area 6. Groundwater samples from the vertical profile borings were analyzed for the following constituents: arsenic, alkalinity, chloride, dissolved oxygen (DO), nitrates, nitrites, ammonia, phosphate, sulfate, iron, herbicides, pH, and oxidation-reduction potential (ORP).

A total of five permanent monitoring wells were installed during various stages of the Phase II investigation. Monitoring well MW-8 was installed in Area 1 in May 2004. Four additional permanent monitoring wells, one off-property (MW-9) and three on-property (MW-10 through MW-12), were installed in October 2004. Groundwater samples were collected from the five permanent monitoring wells and analyzed for arsenic, alkalinity, chloride, DO, nitrogen compounds, phosphate, sulfate, iron, herbicides, pH, and ORP. Samples from MW-10 and MW-11 were also analyzed for VOCs, TPH-Gx, and TPH-Dx.

The surface water/sediment investigation of the lagoon located in the southeastern portion of Area 1 was completed in June 2004. One sample of the lagoon surface water and one sample of the lagoon sediment, along with duplicate samples, were collected to evaluate the nitrogen concentrations.

Single well pump tests were performed at monitoring wells MW-1 and MW-3 through MW-8 to estimate the horizontal hydraulic conductivity of the shallow aquifer. The hydraulic conductivities (K) were calculated to range from 2.74E-05 to 4.12E-04 cm/s, with an average hydraulic conductivity of 1.45E-04 cm/s. This hydraulic conductivity is characteristic of fine sands, organic and inorganic silts, and mixtures of sand, silt, and clay.

The following findings and conclusions were reached from the Phase II RI activities:

Area 3 Soils

- Detected concentrations of TPH-Gx in Area 3 at a depth of 7.5 feet bgs were above MTCA Method B and C CULs.

Area 5 Soils

- Detected concentrations of constituents of concern in subsurface soil in Area 5 did not exceed MTCA Method B and C CULs or other screening criteria.

Area 5 SPLP

- Comparing the detected results of the Area 5 SPLP analysis against MTCA Method B and C groundwater criteria or secondary MCLs, nitrite-N and sulfate did not exceed groundwater standards. Nitrate-N and iron did exceed MTCA Method B and C criteria and secondary MCLs, respectively.

Lagoon Water and Sediment Samples

- Concentrations of ammonia-N were detected in the lagoon surface water and sediment samples. No detections of nitrate-N or nitrite-N were observed.

Groundwater

- Arsenic concentrations in all five newly installed monitoring wells exceeded the MTCA Method A, B, and C criteria. However, the range of arsenic concentrations observed are fairly consistent across the property and appear to be within normal background concentrations for arsenic.

- Ammonia-N was also detected at MW-8 and MW-12, within the source areas identified during the Phase I RI. Ammonia-N was not detected in MW-9, which suggests that the ammonia is being naturally attenuated and is not migrating off-property.

- Nitrate-N was detected in all newly installed monitoring wells at concentrations above the MTCA Method B criteria. The high concentrations observed in MW-8 and MW-12 are contained within the main nitrate-N source areas as defined in the Phase I RI. High concentrations of nitrate-N were also detected in MW-9, which is located off-property in a southeasterly direction. The nitrate-N concentrations detected at MW-10 and MW-11 are slightly over the MCTA Method B criteria and likely approaching background concentrations.

- Concentration isopleths of nitrate-N developed from the vertical profile sampling show source areas are primarily located in the southeastern portion of the property (Area 1 and the southern section of Area 6). Exceedances of the MTCA Method B and C groundwater criteria were observed in the vertical profile borings for 2,4-D, ammonia-N, arsenic, dinoseb, nitrate-N, and nitrite-N.

- 2,4-D was detected in MW-12 at concentrations slightly in excess of the MTCA Method B criteria. MW-12 is also contained within the defined nitrate groundwater plume.

- Detected concentrations of benzene in MW-10 exceeded MTCA Method A, B, and C groundwater criteria.

2.3 QUARTERLY GROUNDWATER MONITORING EVENTS

Six quarters of groundwater monitoring have been completed at the Site. During the first four quarters of sampling, groundwater samples were collected from the six monitoring wells located during the Phase I RI (MW-1, MW-3, MW-4, MW-5, MW-6, and MW-7). The first quarter of monitoring was the Phase I groundwater investigation, completed on July 29 and July 30, 2003. The second quarter of groundwater monitoring was completed on October 27, 2003. The third quarter monitoring was completed on January 28, 2004, and the fourth quarter of groundwater monitoring was completed on June 1, 2004.

During the last two quarters of groundwater monitoring, which were completed in September 2005 and January 2006, samples were collected from the entire monitoring network (MW-1, MW-3, MW-4, MW-5, MW-6, MW-7, MW-8, MW-9, MW-10, MW-11, and MW-12). The static water level and groundwater elevations for these two quarters are shown in the table below. Two additional quarterly sampling events are scheduled to be completed in 2006.

Well ID	Top of PVC Elevation (ft)	3Q05 Depth to Groundwater (ft)	3Q05 Groundwater Elevation (ft)	4Q05 Depth to Groundwater (ft)	4Q05 Groundwater Elevation (ft)
MW-1	745.86	11.67	734.19	10.74	735.12
MW-3	740.92	7.23	733.69	5.55	735.37
MW-4	741.88	8.30	733.58	7.00	734.88
MW-5	741.93	7.82	734.11	6.50	735.43
MW-6	741.73	6.71	735.02	5.51	736.22
MW-7	744.68	10.65	734.03	9.76	734.92
MW-8	741.32	7.04	734.28	5.58	735.74
MW-9	741.09	8.31	732.78	7.04	734.05
MW-10	742.38	6.48	735.90	5.46	736.92
MW-11	742.10	6.01	736.09	5.03	737.07
MW-12	741.82	8.85	732.97	7.55	734.27

The groundwater flow direction was generally in a southeasterly direction, with a slight fluctuation of flow to the north observed near MW-7 during the recent sampling events. The groundwater elevation map from the most recent sampling event (fourth quarter 2005) is included as Figure 4.

2.4 BENCH-SCALE TREATABILITY STUDY AND FIELD PILOT STUDY

A bench-scale treatability study and field pilot study were conducted at the Site to guide future remediation activities. The results of the bench-scale treatability study and field pilot study are detailed in the *Phase II Remedial Investigation Report*, and are summarized as follows:

- The treatability study determined that the most effective treatment sequence was denitrification using acetate as an electron donor with possible subsequent ammonia removal by aeration.

- The pilot study demonstrated that the injection of acetate was successful in lowering nitrate-N, nitrite-N, and dinoseb concentrations to below detectable limits in the groundwater within a ten-foot diameter of MW-4 for the duration of the monitoring period. Reduced concentrations of nitrate-N, nitrite-N, and dinoseb were also noted in saturated soils.

- Groundwater collected from borings installed at locations 10 and 15 feet west of the pilot study area to determine the range of influence of the pilot study treatment yielded detections of nitrate-N at levels above the MTCA Method B and C groundwater criteria. Concentrations of ammonia-N were also detected.

- High concentrations of nitrates appear to inhibit biological processes that convert ammonia to nitrites. Suitable remediation for ammonia would require denitrification in anaerobic conditions to remove nitrates, nitrification in aerobic conditions to remove ammonia, then a second round of denitrification in anaerobic conditions to remove remaining nitrates. This may not be a feasible treatment alternative since the soils currently appear to be void of nitrifying bacteria and the soil permeability restricts the ability to inoculate the Site.

- Subsurface aeration was not effective in removing ammonia-N concentrations from the groundwater during three days of aeration. Although pH adjustment was able to deionize the ammonium ions to form ammonia gas, it appeared that the ammonia gas was absorbed by the overlying soil column before reaching the ground surface.

2.5 BIOSCREEN MODELING

A groundwater fate and transport model was also used to estimate how far nitrate would travel from the property over various periods of time. Groundwater concentrations for nitrate were modeled with BIOSCREEN. The model was calibrated using site-specific parameters, then used to predict time of travel for nitrate transport toward a down-gradient municipal water supply well. The following predictions were made from the BIOSCREEN modeling:

- The center of the nitrate plume is moving at a rate of approximately 1 to 2 feet per year. Due to dispersion, the front of the plume is shown to move at a rate of approximately 2 to 3 feet per year.

- Dispersion is causing the maximum concentration of the plume to decay exponentially. Thus, the maximum concentration of the plume would decrease at least one order of magnitude by the time it travels 900 feet.

- The leading edge of the nitrate plume will reach the nearest water supply well in approximately 400 years.

- The plume will require a travel distance of more than one mile (travel time of more than 2000 years) before the maximum concentration of nitrate will decrease by dissolution to less than the Federal Drinking Water MCL of 10 mg/l, and significantly longer to reach the MTCA Method B CUL of 1.6 mg/l.

These findings show the nitrate will attenuate over time and distance and there is no immediate threat to identified down-gradient receptors. However, the modeling also suggests the nitrate will not attenuate by natural processes to the degree required to protect down-gradient receptors. Therefore, source treatment is recommended in the heart of the nitrate plume to address the elevated nitrate concentrations and increase the nitrate degradation rates for enhancement of subsurface attenuation processes.

2.6 PRELIMINARY SCREENING OF REMEDIAL ALTERNATIVES

The *Preliminary Screening of Remedial Alternatives Technical Memorandum* was prepared to pre-screen conceptual remediation approaches for implementation at the Site. The memorandum identified the constituent of concern (COC) categories as plant nutrients, herbicides, pesticides, and VOCs, and key indicator contaminants within these COC categories were identified as nitrates, ammonia, 1,2-dichloropropane (1,2-DCP), 1,2,3-trichloropropane (1,2,3-TCP), arsenic, and benzene. It was identified the remedial alternatives evaluated for the Site should focus on source reduction, plume containment, and compliance monitoring. The IRM activities proposed in this work plan are intended to focus on the source reduction.

3.0 2006 INTERIM REMEDIAL MEASURES WORK SCOPE

This 2006 IRM work scope focuses on TPH impacts in the source areas of the Site as well as closure of the lined lagoon. Water in the lined lagoon will be removed and transported off-site for disposal. When the liner is removed, calcium acetate will be spread across the bottom of the lagoon depression prior to backfilling with clean fill. The calcium acetate in the lagoon area will serve as a soluble electron donor to enhance biological denitrification. The former drum storage area south of the main entrance gate impacted by TPH-Gx will be treated with sodium persulfate to enhance chemical and biological oxidation of TPH-Gx located in the capillary fringe.

It is important to note that active industrial operations are occurring at the Site, resulting in dynamic conditions, especially with respect to staged materials and equipment. Therefore, some details of this report may need to be refined based on the results of Site reconnaissance that would occur prior to actual mobilization to the Site. Details of the proposed IRM work activities, based on a current understanding of Site conditions, are summarized below.

3.1 SITE PREPARATION

The following work tasks will be performed to prepare the Site for 2006 IRM activities:

- Chevron and BP will obtain access agreements from all property owners located within the areas to be addressed by the IRM program;
- A site visit will be conducted by SECOR to better define the volume of concrete, debris piles, and lagoon water needing to be removed from the Site as the time-frame for actual IRM work approaches;
- The property owners will be notified by SECOR of when and where the remedial work activities will be conducted and meetings will be held to determine how to perform the work scope without interfering with property owner's operations;
- A Site reconnaissance visit will be conducted by SECOR with all subcontractors that will be involved in remediation activities to evaluate potential site hazards, obstructions, or restrictions that need to be addressed prior to mobilization;
- Injection permits may be required, and SECOR will work with the Department of Ecology to obtain the appropriate permits;
- Arrangements will be made with property owners to clear the proposed work zones where remediation will be conducted;
- The Site Health and Safety Plan (HASP) will be amended, signed, and reviewed by all parties who will be involved in construction and remediation activities;
- An underground utility locator call will be placed to identify utilities in or around the remedial work area;
- A private utility locator will be contracted to identify any additional utilities;
- Drilling subcontractors will be required to attend a pre-mobilization meeting to discuss the work plan, project schedule, training requirements, daily job safety analysis requirements, and other important health and safety issues;
- Staging areas for the treatment chemicals and backfill soil will be identified, marked, and labeled;

- Waste profile forms and approvals for disposal will be obtained for impacted soils and lagoon water based on existing analyses prior to mobilization, if possible; and
- A traffic control plan, material unloading and loading plan, and material staging plan will be developed to address all deliveries of materials that will arrive on-site by truck or shipped off-site by truck.

3.2 PRELIMINARY DELIVERIES AND SHIPMENTS

Delivery of essential materials (calcium acetate, sodium persulfate, and backfill soil) to the Site is a critical path item that all IRM work activities are dependent upon. Therefore, subcontractors will not be allowed to mobilize to the Site until adequate preliminary deliveries of materials have been received, unloaded, staged, and properly secured.

The treatment chemicals (food-grade calcium acetate and sodium persulfate) will arrive by truck. The calcium acetate will arrive on pallets with six 100-pound fiber drums located on each pallet. Each fiber drum will be approximately 30 inches tall. A SECOR operator will remove the pallets from the truck one at a time with a rubber tire fork lift and stage the pallets on plastic in a designated storage area. A total of two pallets of food-grade calcium acetate will be required for the lagoon closure. The required storage area for the treatment chemical will be approximately 100 square feet of storage area plus adequate area for access by forklift. Plastic sheeting will be draped over the pallets and secured to the pallets for protection of the chemical from the weather.

The sodium persulfate will arrive on-site by truck with fourteen 50-lb bags of sodium persulfate on a pallet. The sodium persulfate will be stored in a location separate from the calcium acetate. Each bag of sodium persulfate will be placed inside a high density polyethylene (HDPE) protective bag to shield the chemical from weather and elements until it is needed. The pallet will also be covered with plastic sheeting. The pallet will be clearly marked and labeled to indicate that the material is an oxidizing chemical.

Approximately 70 cubic yards (yd^3) of clean soil will be delivered to the Site for use in backfilling the lagoon. The soil will be delivered to the Site by dump truck (no tandems) and placed in a designed staging area for use when needed. Ideally, the soil staging area will be adjacent to the lagoon. However, it may be staged in an alternate location if space is limited, and later moved by front-end loader to the lagoon area when needed for backfilling operations.

Two, 20-yd^3 roll-off boxes will arrive on-site and be staged in the appropriate work area for disposal of non-hazardous waste (lagoon liner, concrete, trash, soil cuttings, etc.).

3.3 REMOVAL OF CONCRETE PAD AND SADDLES

A concrete pad and tank saddles from a former liquid ammonia tank still exist at the Site just west of the lagoon in the central portion of the nitrate-impacted area. The concrete pad and saddles must be removed in order to gain access and work efficiently and safely around the lagoon during IRM activities. Fencing will also need to be permanently removed or temporarily removed for these activities. Other small piles of debris in the area may also have to be removed. If necessary, a large pile of rocks in the west portion of Area 1 will be moved. The issues of which materials, equipment, and debris piles will require movement or disposal will be

better understood prior to initiation of work based on a reconnaissance visit conducted prior to mobilization.

Initial construction activities will involve demolition of the concrete structures using an excavator equipped with a demolition hammer and removal of small debris piles. The excavator will break apart the concrete structure into pieces no larger than three feet wide for disposal. After the concrete is sufficiently broken apart, the concrete will be loaded into roll-off boxes for non-hazardous disposal. The preliminary estimated mass of concrete that needs to be removed from this area is 40 tons. More precise estimates of the actual concrete and debris volumes and masses will be made during the next Site visit. Once the concrete and debris has been characterized and the volumes defined, arrangements will be made for recycling or off-site disposal.

3.4 LAGOON CLOSURE

After the concrete structures have been removed and the area has been sufficiently graded and compacted for construction activities, a vacuum truck will be mobilized to the Site to remove the standing water from inside the lagoon. The most recent estimates indicate that the lagoon contains 12,000 gallons of water; however, more precise and up-to-date measurements will be made during the next Site visit. The water removed from the lagoon will be transported to Waste Management in Arlington, Oregon for disposal, assuming Waste Management can accept the material based on its waste profile. Final disposal arrangements will be determined as part of the planning process after approval of the work plan.

After all of the water has been removed from the lagoon, an excavator will be used to tear and remove the liner from the lagoon. The liner pieces will be placed into the roll-off boxes with the concrete for disposal. The operator will then use the excavator bucket to spread approximately 1,000 pounds of food-grade calcium acetate across the bottom of the lagoon to serve as an electron donor for enhanced denitrification. Calcium acetate is a highly soluble, food-grade salt that will dissolve into the moisture of the soils below the lagoon to facilitate treatment of soil located immediately below the lagoon. After the treatment reagent is deposited, it will further disperse over time by diffusion and convective transport associated with precipitation events. The lagoon will be backfilled with clean soil in one-foot lifts with compaction of the soil being performed between each lift. Approximately 70 yd^3 of clean fill will be required for backfilling the lagoon.

3.5 TREATMENT OF THE TOTAL PETROLEUM HYDROCARBON SOURCE AREA

Elevated concentrations of TPH-Gx in the range of 360 to 1,800 milligrams per kilogram (mg/kg) were detected in the soil at 7.5 feet bgs in Area 3, a former drum storage area located immediately south of the main entrance gate. This area is located adjacent to one of the Site buildings and has dimensions of approximately 40 feet by 40 feet as shown on Figure 5.

Because the impacts appear to be localized to the capillary fringe in a small area directly adjacent to a building, an in-situ treatment remedy is recommended rather than excavation. The treatment involves the installation of four temporary, 2-inch, polyvinyl chloride (PVC) chemical injection wells spaced approximately 20 feet on center within the impacted area. Each well will be screened from 7 to 12 feet bgs using 10-slot screen.

One thousand gallons of two percent sodium persulfate solution will be injected into each of the four wells for treatment of the impacted area. Water for the treatment will be delivered by truck and the chemical will be mixed inside a 500-gallon polytank for injection. The injection will be performed by placing a submersible pump inside the polytank and routing the treatment solution through an injection manifold that injects into each of the four wells simultaneously. Workers handling the food-grade treatment chemical will wear protective outer clothing, goggles, and a dust mask in addition to the basic personal protective equipment (PPE) required.

3.6 MONITORING WELL REPLACEMENT

Any monitoring wells damaged during implementation of the 2006 IRM activities will be replaced. Damaged monitoring wells will be over-drilled and backfilled with a cement/bentonite grout. The replacement monitoring wells will be installed as two-inch diameter PVC wells installed in 10-1/4 diameter borings drilled by hollow-stem auger method. The wells will be set with slotted (0.010-inch) PVC screens installed across the same depth interval as the damaged well it is replacing.

The well installations will be completed with sand filter packs, hydrated bentonite seals, and cement/bentonite grouts. Wells will be completed at the ground surface with flush-mounted well monuments. Well construction details will be recorded on the Boring Log and Well Construction Schematic form as shown in Appendix A. Well completion details may be modified based on conditions encountered in the field at the discretion of qualified field personnel.

Once the wells are completed, each will be developed by surging and bailing to remove fine-grained sediment from the formation and filter packs, and increase the hydraulic efficiency of the well. The wells are to be surged with a surge block through the full extent of the screened interval while simultaneously being purged. Development will be considered complete when each respective well produces water that is relatively free of sediment. At a minimum, ten well volumes of groundwater are to be removed from each well during the development process. All equipment will be decontaminated to minimize cross-contamination between well locations. Drill cuttings will be placed into a roll-off box for off-site disposal with the soil cuttings generated during installation of the calcium acetate delivery borings.

3.7 SURVEYING

The location for all sodium persulfate injection wells, and newly installed monitoring wells will be surveyed by a licensed surveyor as part of the IRM activities. The surveyor will mark the monitoring well casings in any newly installed wells to facilitate future water level gauging.

3.8 POST-TREATMENT SAMPLING

Quarterly groundwater sampling is estimated to be initiated in September 2006, as part of the Phase III Remedial Investigation (RI), and will be a continuation of the quarterly sampling currently being conducted at the Site with the addition of the hardness analysis. The sampling program for each well is detailed in the table below. Any additional wells installed as part of the Phase III RI will be included in the sampling program, and analyzed for the same constituents as MW-9.

GROUNDWATER SAMPLING ANALYTES AND ASSOCIATED CONTAINERS			
Well IDs	**Analytes (Method)**	**No. of Containers**	**Sample Container(s) (Preservative)**
MW-1 MW-5 MW-7 MW-8	Arsenic, Iron, Manganese (6010/7000), Hardness (SM 2340B)	1	500 ml plastic (HNO_3)
	Alkalinity (310.1), Chloride (300.0)	1	500 ml plastic (none)
	Nitrate-N (353.2), Nitrite-N (353.2), Sulfate (375.4), pH (150.1)	1	500 ml plastic (none)
	Ammonia-N (350.3)	1	1000 ml glass bottle (H_2SO_4)
MW-3	Arsenic, Iron, Manganese (6010/7000), Hardness (SM 2340B)	1	500 ml plastic (HNO_3)
	Alkalinity (310.1), Chloride (300.0)	1	500 ml plastic (none)
	Nitrate-N (353.2), Nitrite-N (353.2), Sulfate (375.4), pH (150.1)	1	500 ml plastic (none)
	Ammonia-N (350.3)	1	1000 ml glass bottle (H_2SO_4)
	Chlorinated Herbicides (8151A)	2	1L amber glass ($Na_2S_2O_3$)
MW-4 MW-9 MW-12	Arsenic, Iron, Manganese (6010/7000), Hardness (SM 2340B)	1	500 ml plastic (HNO_3)
	Alkalinity (310.1), Chloride (300.0)	1	500 ml plastic (none)
	Nitrate-N (353.2), Nitrite-N (353.2), Sulfate (375.4), pH (150.1)	1	500 ml plastic (none)
	Ammonia-N (350.3)	1	1000 ml glass bottle (H_2SO_4)
	VOCs (8260)	3	40 mL VOA (HCl)
	Chlorinated Herbicides (8151A)	2	1L amber glass ($Na_2S_2O_3$)
MW-6 MW-10 MW-11	Arsenic, Iron, Manganese (6010/7000), Hardness (SM 2340B)	1	500 ml plastic (HNO_3)
	Alkalinity (310.1), Chloride (300.0)	1	500 ml plastic (none)
	Nitrate-N (353.2), Nitrite-N (353.2), Sulfate (375.4), pH (150.1)	1	500 ml plastic (none)
	Ammonia-N (350.3)	1	1000 ml glass bottle (H_2SO_4)
	Chlorinated Herbicides (8151A)	2	1L amber glass ($Na_2S_2O_3$)
	TPH-Gx (8015 Mod.), VOCs (8260)	6	40 mL VOA (HCl)

The sampling details will be recorded on a Groundwater Field Data Sheet as shown in Appendix B. Groundwater sampling will be conducted in accordance with the groundwater sampling procedures, decontamination procedures, quality control specifications, sample identification scheme, and sample handling and custody detailed in the *Groundwater Monitoring and Sampling Work Plan* dated November 14, 2005.

3.9 FIELD DOCUMENTATION

During the course of investigative activities at the Site, field activities will be documented using a field notebook, meeting notes, sign-in sheets, Boring Log and Well Construction Schematic forms, and Groundwater Sampling Field Data Sheets. Field personnel will use the field notebook to record any pertinent information and to describe observations during boring

advancement. After the IRM field activities are completed, the field notebooks will be in the custody of the project coordinator. Personnel will update the project notebooks daily during field activities to summarize arrival and departure times for workers and subcontractors, equipment calibration records, and any remedial construction activities.

Following the completion of the 2006 IRM activities and post-treatment sampling, a 2006 Interim Remedial Measures Completion Report will be prepared documenting field activities and results.

4.0 2006 INTERIM REMEDIAL MEASURES SCHEDULE

Source area treatment of nitrates is planned for Areas 1 and 6 at the Site. However, this work is scheduled for early 2007, after the Phase III RI has been completed and evaluated. The Phase III RI Work Plan was approved by Ecology in correspondence dated March 29, 2006. In addition, as communicated to Ecology on April 6, this schedule will allow CEMC and BP to fully address safety concerns regarding the property status (debris, equipment, etc.) and negotiations with property owners. Detailed procedures for implementing nitrate source area treatment interim remedial measures will be submitted in the 2007 Interim Remedial Measures Work Plan.

The 2006 Interim Remedial Measures Work Plan for the Bee-Jay Scales Site will be implemented upon Ecology approval. The anticipated 2006-2007 project schedule for the Bee-Jay Scales Site is presented in Appendix C. It is anticipated the pre-mobilization planning and coordination with Site owners would begin immediately upon approval of the work plan by Ecology, and mobilization to the Site will occur according to the project schedule barring no unforeseen complications or delays.

5.0 LIMITATIONS

The conclusions and recommendations contained in this work plan are based upon professional opinions with regard to the subject matter. These opinions have been arrived at in accordance with currently accepted hydrogeologic and engineering standards and practices applicable to this location, and are subject to the following limitations:

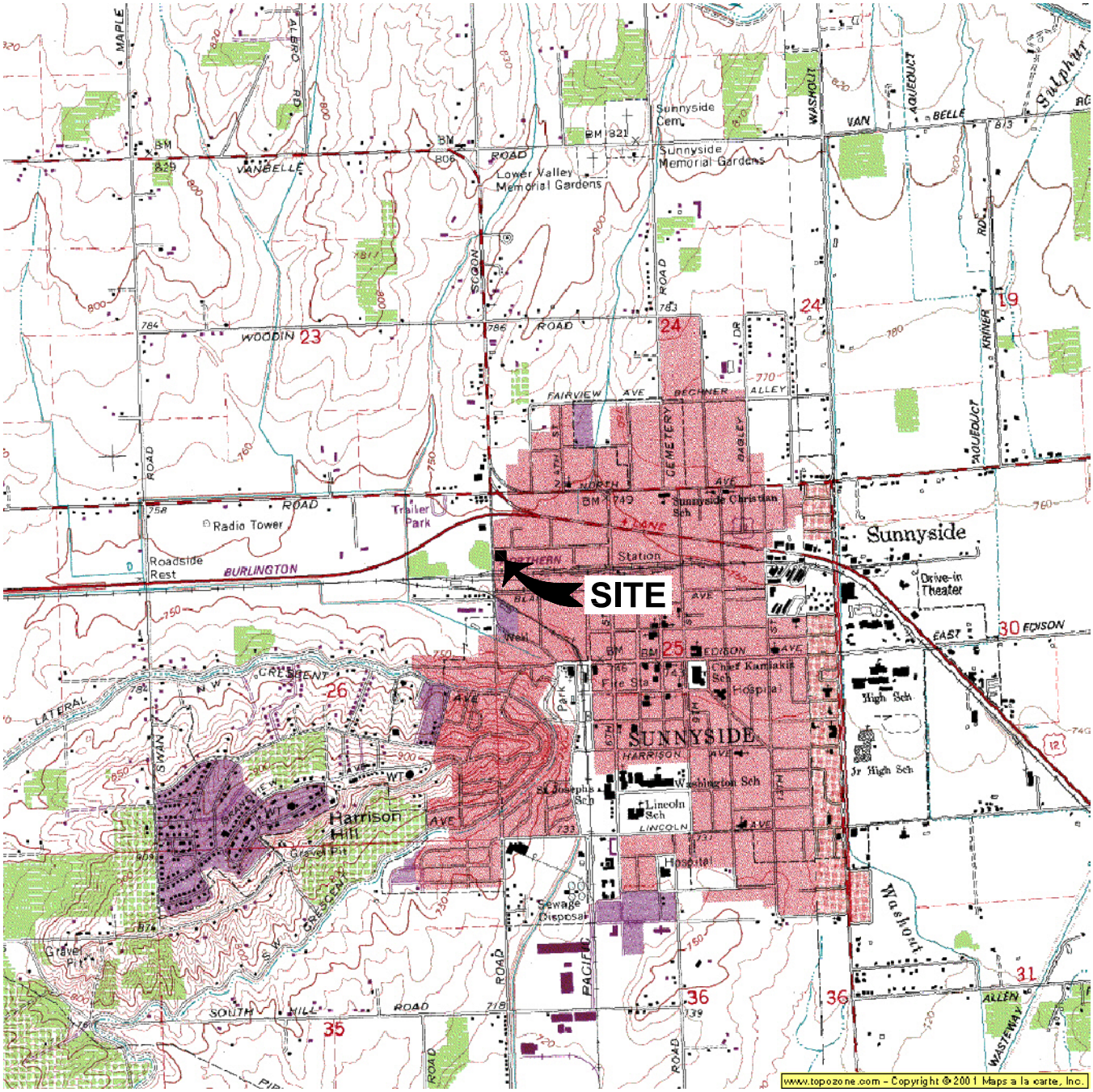
1. The data and findings presented in this work plan are valid as of the dates when the investigations were performed. The passage of time, manifestation of latent conditions, or occurrence of future events may require further exploration at the Site, analysis of the data, and reevaluation of the findings, observations, and conclusions expressed.

2. The data reported and the findings, observations, and conclusions expressed in the work plan are limited by the Scope of Work. The Scope of Work was defined by the request of the client, the time and budgetary constraints imposed by the client, and availability of access to the Site. SECOR cannot verify the accuracy of data provided by previous consultants.

3. Because of the limitations stated above, the findings, observations, and conclusions expressed by SECOR in this work plan are not, and should not be, considered an opinion concerning the compliance of any past or present owner or operator of the Site with any federal, state, or local law or regulation.

4. No warranty or guarantee, whether expressed or implied, is made with respect to the data or the reported findings, observations, and conclusions, which are based solely upon Site conditions in existence at the time of the investigations.

5. SECOR work plans and reports present professional opinions and findings of a scientific and technical nature. While attempts were made to relate the data and findings to applicable environmental laws and regulations, the report shall not be constructed to offer legal opinion or representations as to the requirements of, nor the compliance with, environmental laws, rules, regulations, or policies of federal, state, or local governmental agencies. Any use of this report constitutes acceptance of the limits of SECOR's liability. SECOR's liability extends only to its client and not to any other parties who may obtain the report. Appropriate legal counsel should review issues raised by the work plan.



QUADRANGLE LOCATION

N

0 1/4 1/2 1

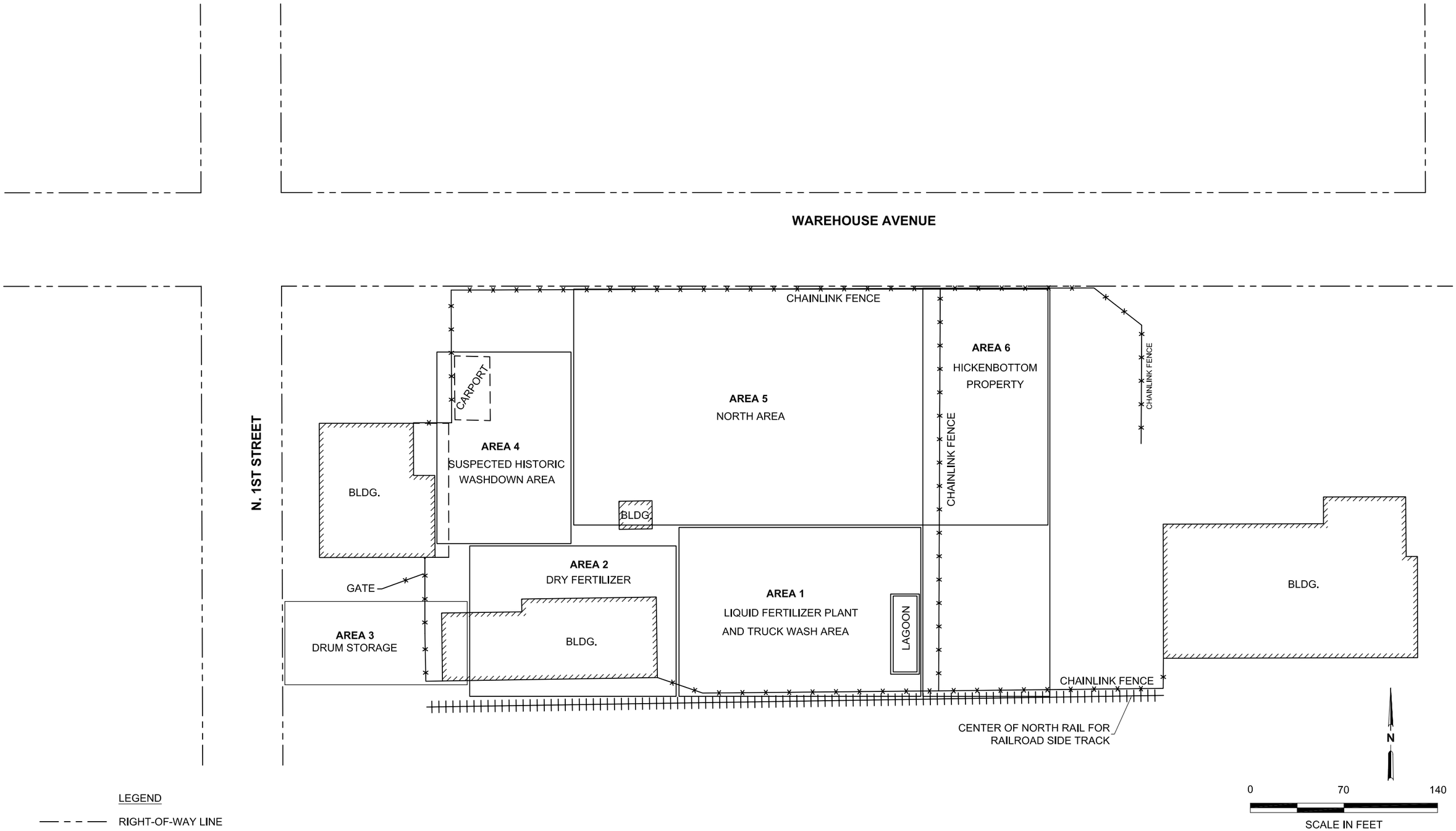
SCALE IN MILE

0 1000 2000

1 INCH = 2000 FEET

SOURCE: USGS 7.5 MINUTE QUADRANGLE; SUNNYSIDE, WASHINGTON; 1975

SECOR 2321 CLUB MERIDIAN DR. SUITE E OKEMOS, MI 48864	FOR: BEE-JAY SCALES SITE SUNNYSIDE, WASHINGTON		**SITE LOCATION MAP**		FIGURE: **1**
	JOB NUMBER: 24CH.67201.00	DRAWN BY: KAM	CHECKED BY:	APPROVED BY:	DATE: 11/02/05

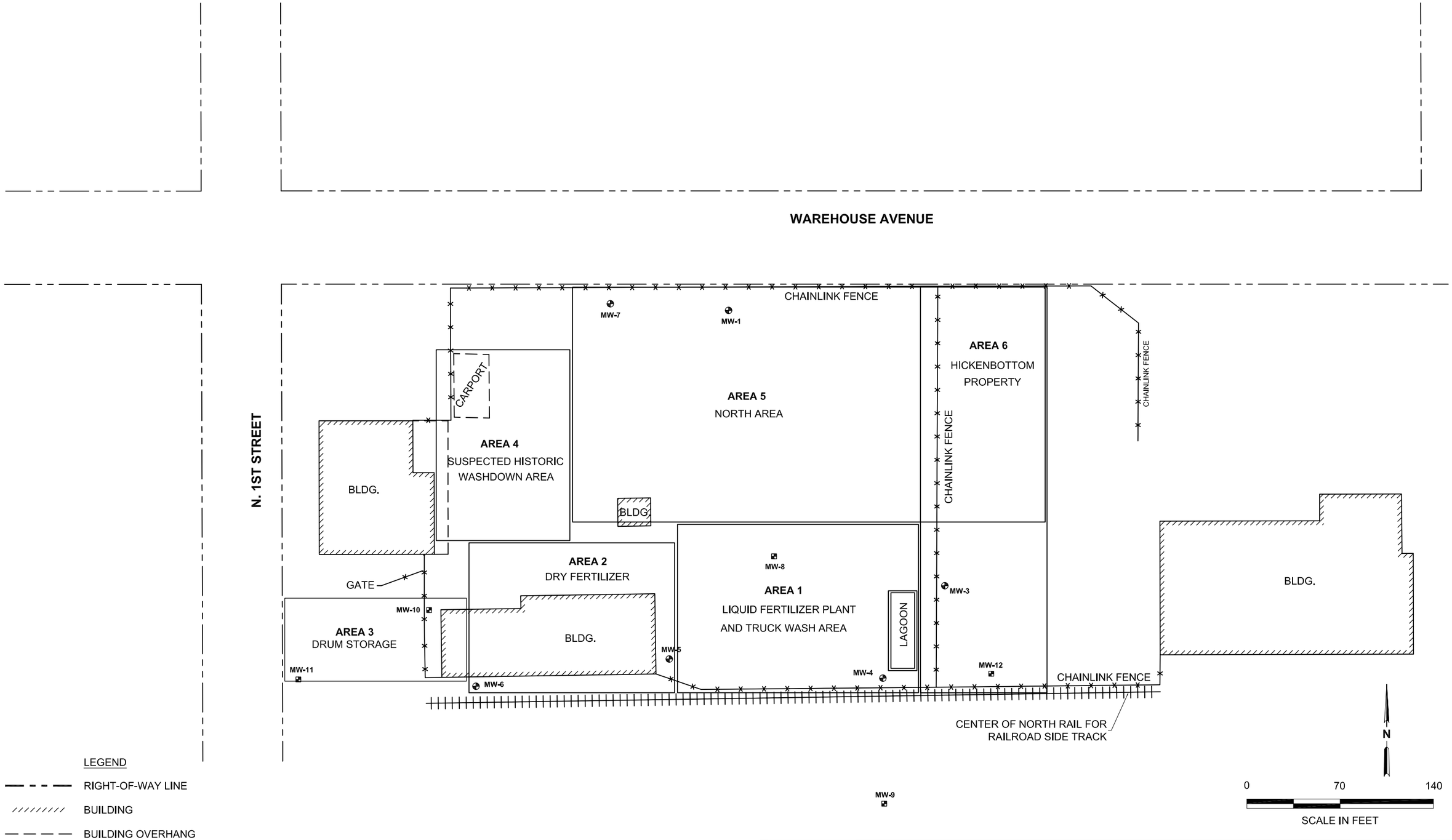


LEGEND

- RIGHT-OF-WAY LINE
- BUILDING
- BUILDING OVERHANG
- CHAINLINK FENCE

SECOR
2321 CLUB MERIDIAN DR. SUITE E
OKEMOS, MI 48864

FOR:			FIGURE:
BEE-JAY SCALES SITE SUNNYSIDE, WASHINGTON		**GENERAL SITE LAYOUT**	**2**
JOB NUMBER: 24CH.67201.00	DRAWN BY: KAM	CHECKED BY: / APPROVED BY:	DATE: 11/02/05

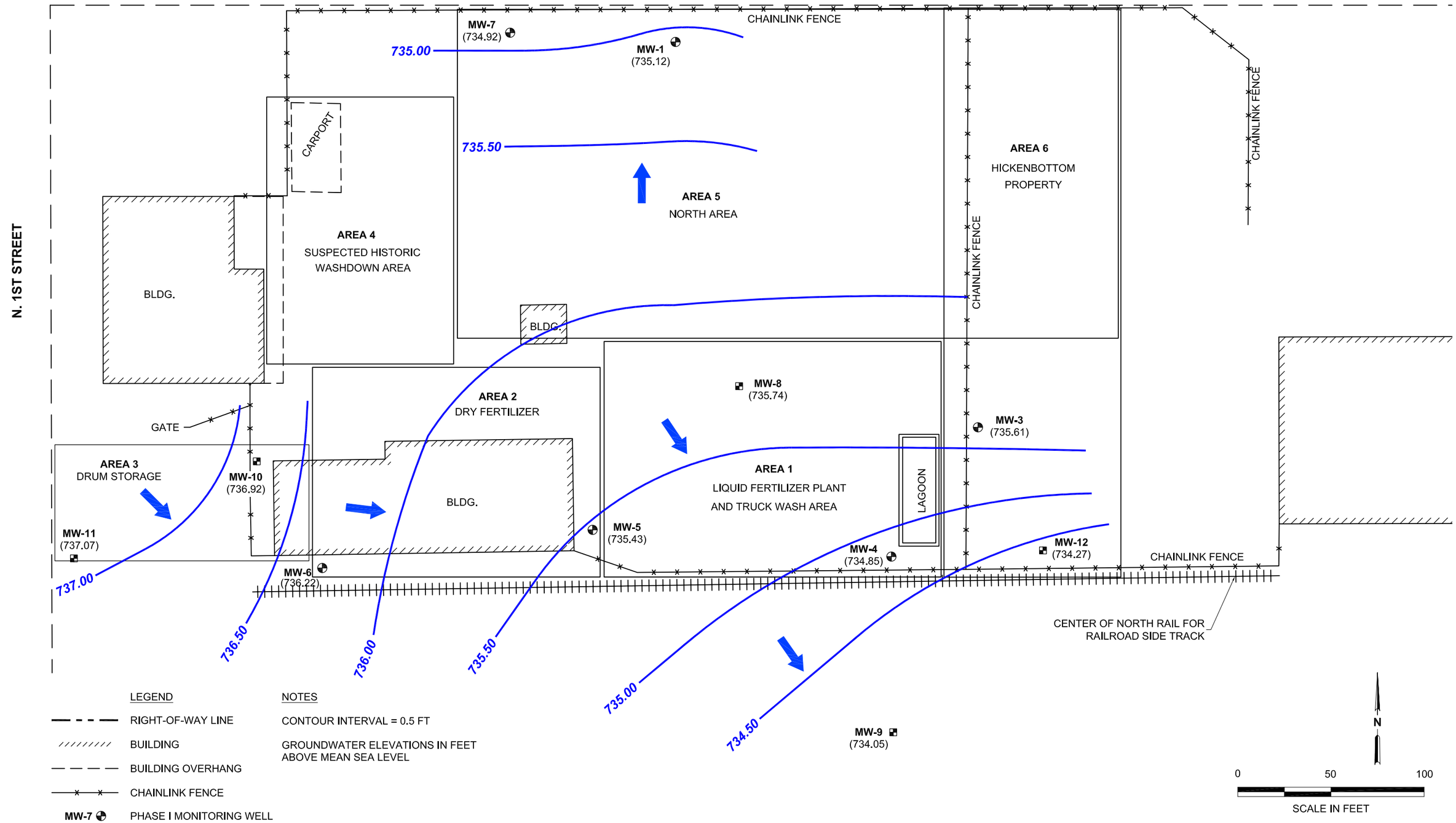


LEGEND

- RIGHT-OF-WAY LINE
- BUILDING
- BUILDING OVERHANG
- CHAINLINK FENCE
- MW-7 PHASE I MONITORING WELL
- MW-8 PHASE II MONITORING WELL

SECOR
2321 CLUB MERIDIAN DR. SUITE E
OKEMOS, MI 48864

FOR:			FIGURE:
BEE-JAY SCALES SITE SUNNYSIDE, WASHINGTON		**MONITORING WELL LOCATION MAP**	**3**
JOB NUMBER: 24CH.67201.00	DRAWN BY: KAM	CHECKED BY: / APPROVED BY:	DATE: 11/02/05



LEGEND

- RIGHT-OF-WAY LINE
- BUILDING
- BUILDING OVERHANG
- CHAINLINK FENCE
- MW-7 PHASE I MONITORING WELL
- MW-8 PHASE II MONITORING WELL
- INFERRED GROUNDWATER FLOW DIRECTION
- GROUNDWATER ELEVATION CONTOUR (FEET); DASHED WHERE INFERRED
- (737.07) RELATIVE GROUNDWATER ELEVATION (FEET)

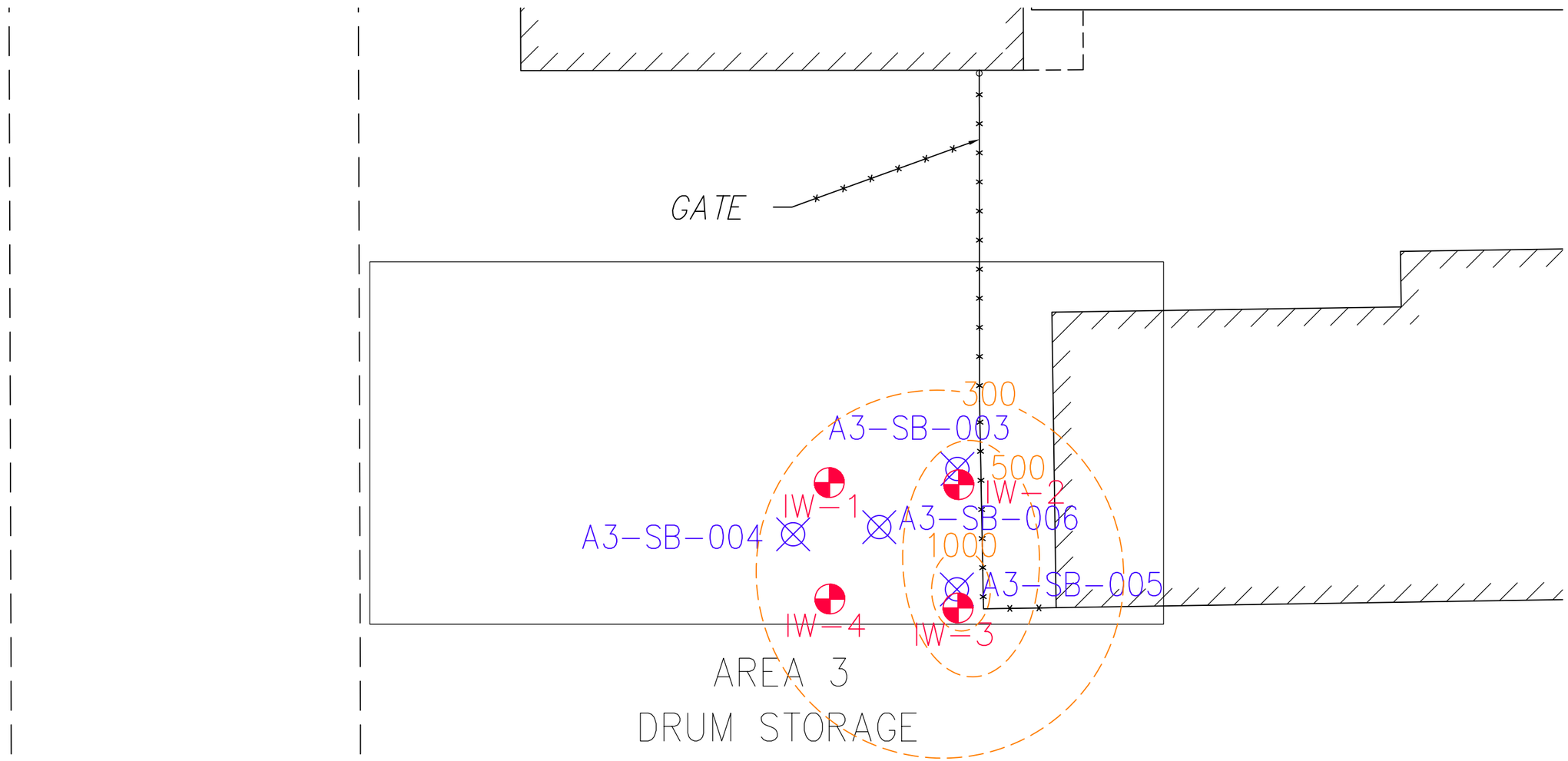
NOTES

CONTOUR INTERVAL = 0.5 FT

GROUNDWATER ELEVATIONS IN FEET ABOVE MEAN SEA LEVEL

SECOR
2321 CLUB MERIDIAN DR. SUITE E
OKEMOS, MI 48864

FOR:			FIGURE:
BEE-JAY SCALES SITE SUNNYSIDE, WASHINGTON		FOURTH QUARTER 2005 GROUNDWATER ELEVATION MAP	4
JOB NUMBER: 24CH.67201.00	DRAWN BY: KAM	CHECKED BY: MRP	APPROVED BY:	DATE: 02/11/06



LEGEND

- RIGHT-OF-WAY LINE
- BUILDING
- BUILDING OVERHANG
- CHAINLINK FENCE
- PERSULFATE INJECTION WELL
- PHASE II SOIL BORING
- 500 — APPROXIMATE TPH-Gx CONCENTRATION ISOPLETH AT 7.5' (MG/KG)

ALL RESULTS SHOWN ARE FOR NWTPH-Gx, AND ARE SHOWN FOR EACH DEPTH INTERVAL.

BOLD RESULTS EXCEED MTCA METHOD B AND C CRITERIA.

*EXCEEDS MTCA METHOD B, BUT NOT MTCA METHOD C.

N

0 20 40

SCALE IN FEET

SECOR
2321 CLUB MERIDIAN DR. SUITE E
OKEMOS, MI 48864

FOR:			FIGURE:
BEE-JAY SCALES SITE SUNNYSIDE, WASHINGTON		**TPH-Gx CONTOUR MAP AND INJECTION WELL LOCATIONS**	**5**
JOB NUMBER: 24CH.67201.00	DRAWN BY: DRM	CHECKED BY: MRP	APPROVED BY: JRB	DATE: 03/16/06

APPENDIX A
BORING LOG AND WELL CONSTRUCTION SCHEMATIC

2006 Interim Remedial Measures Work Plan
for the Bee-Jay Scales Site

Chevron Environmental Management Company &
BP America, Inc.

24CH.67201.00
April 14, 2006

PROJECT: _____

LOCATION: _____

PROJECT NUMBER: _____

DRILLING STARTED: _____ **COMPLETED:** _____

INSTALLATION STARTED: _____ COMPLETED: _____

DRILLING COMPANY: _____

DRILLING EQUIPMENT: _____

DRILLING METHOD: _____

SAMPLING EQUIPMENT: _____

WELL / PROBEHOLE / BOREHOLD NO: _____

PAGE: _____ **OF** _____

NORTHING (ft): _____ EASTING (ft): _____

LATITUDE: _____ LONGITUDE: _____

GROUND ELEV (ft): _____ TOC ELEV (ft): _____

INITIAL DTW (ft): _____ **BOREHOLE DEPTH (ft):** _____

STATIC DTW (ft): _____ **WELL DEPTH (ft):** _____

WELL CASING DIAMETER (In): _____ **BOREHOLE DIAMETER (In):** _____

LOGGED BY: _____ CHECKED BY: _____

TIME & DEPTH (feet)	Graphic Log	USCS	**DESCRIPTION:** Example: SAND; SP; olive (2.5Y5/4); trace 5% fines; 20-30% fine-grained sand; fine-to-coarse gravel; medium-dense; medium plasticity; stiff; moist; no petroleum hydrocarbon odor; no staining	Sample	Time Sample ID Method	Measured Recovery (feet)	Blow Counts	Headspace PID (units)	Depth (feet)	Well Construction or Borehole Backfill
0										0
1										**1**
2										2
3										3
4										4
5										**5**
10										**10**
15										**15**
20										**20**
25										**25**

FILEPATH:R:\Office015\KAMERON\Blank Log Form - KAM.dwg|kmanyrath|May 26, 2005 at 17:50|Layout: Model

APPENDIX B
GROUNDWATER SAMPLING FIELD DATA SHEET

2006 Interim Remedial Measures Work Plan
for the Bee-Jay Scales Site

Chevron Environmental Management Company &
BP America, Inc.

24CH.67201.00
April 14, 2006

S E C O R
GROUNDWATER SAMPLING FIELD DATA SHEET

SECOR Project No.: _____ DATE: _____ WELL NO. _____

FACILITY NAME: _____ TEMPERATURE: _____ °F or °C

FIELD PERSONNEL: _____ WEATHER: _____

FIELD MEASUREMENTS:

A. Static Water Level (SWL) below top of casing/piezometer: _____ FT. or IN.

B. Thickness of Free Product, if present: _____ Inches _____ FT. or IN.

C. Total Depth of well (TD) from top of casing/piezometer: _____ FT. or IN.

D. Height of Water Column in casing (h = TD - SWL): _____ FT. or IN.

E. **Useful approximate Purge Volumes (PV) per foot of water column for common casing sizes:**

	3 Well Vols.	5 Well Vols.		
2" Diameter =	0.5 gals/ft	0.82 gals/ft	x feet of water_____ =	_____PV (Gal)
4" Diameter =	2.0 gals/ft	3.25 gals/ft	x feet of water_____ =	_____PV (Gal)
6" Diameter =	4.4 gals/ft	7.35 gals/ft	x feet of water_____ =	_____PV (Gal)

PURGING METHOD: _____ DURATION: _____

OBSERVATIONS:

Cum. PV (Gal)	Time	Turbidity	DO	ORP	pH	Temp.	Conduct.	SWL

TOTAL VOLUME OF WATER PURGED FROM WELL: _____

PURGE WATER STORED/DISPOSED OF WHERE/HOW: _____

SAMPLES COLLECTED: Depth to Water at time of sample collection: _____

Sample Number(s)	Time	Size/Number of Container(s)	Preservative

COMMENTS:

_____

_____

Casing Capacities:
2-inch hole.....0.16 gal/lin ft.
4-inch hole.....0.65 gal/lin ft.
6.5-inch hole.....1.70 gal/lin ft.
8-inch hole.....2.60 gal/lin ft.
10-inch hole.....4.10 gal/lin ft.

Recharge Calculation at Time of Sample Collection:

Total Depth of Well:
Original Water Column: _____ **x** 0.80 = __-- (_____)
Collect sample when Depth to Water measures
Less than or equal to:

Signature: _____

APPENDIX C
PROJECT SCHEDULE

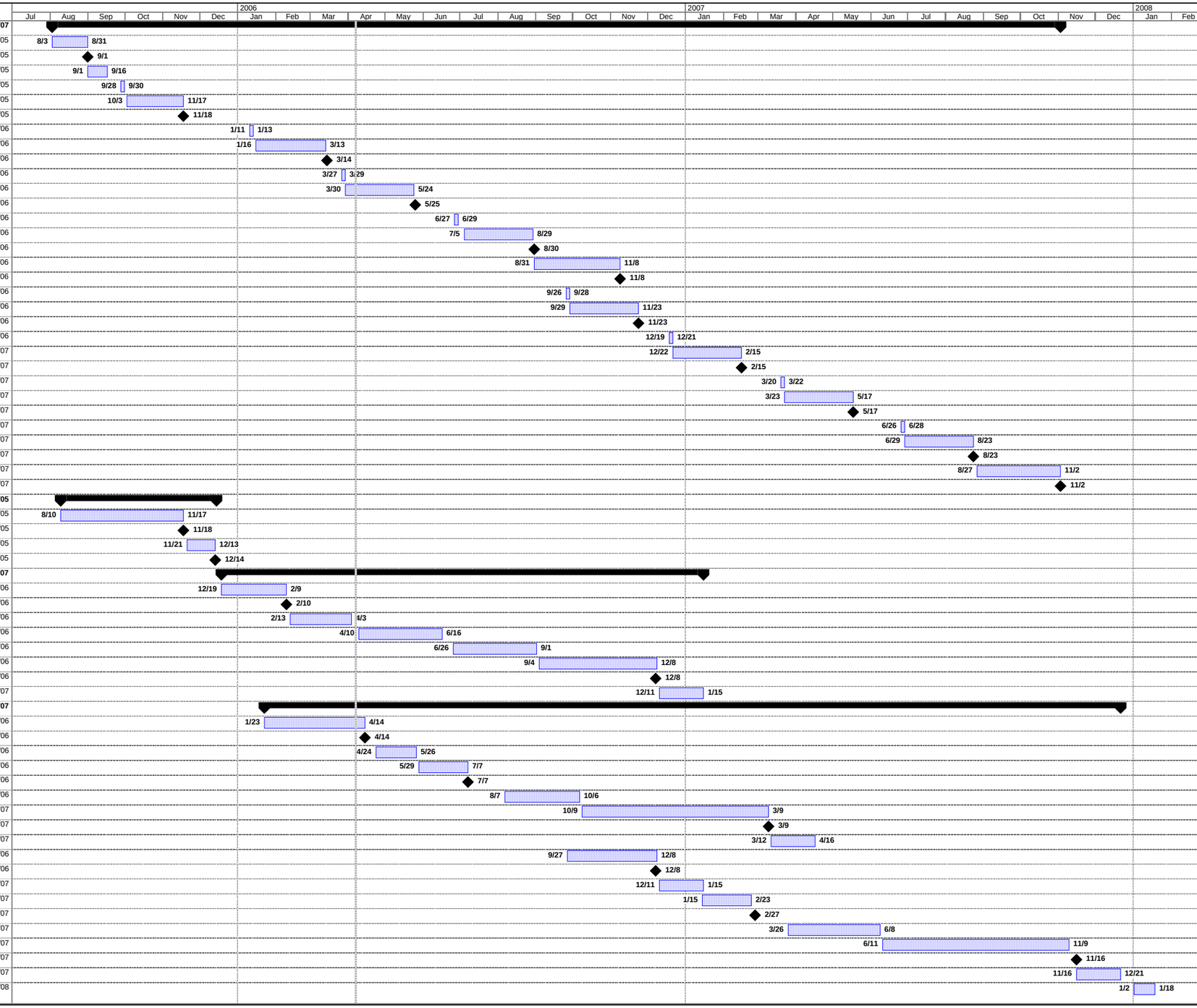
2006 Interim Remedial Measures Work Plan
for the Bee-Jay Scales Site

Chevron Environmental Management Company &
BP America, Inc.

24CH.67201.00
April 14, 2006

Bee-Jay Scales Site 2006-2007 Revised Project Schedule

ID	Task Name	Duration	Start	Finish
1	**Groundwater Monitoring Program**	**588 days**	**Wed 8/3/05**	**Fri 11/2/07**
2	Prepare Proposed Groundwater Monitoring Program (inc. Progress Report Request)	21 days	Wed 8/3/05	Wed 8/31/05
3	Submit Proposed Groundwater Monitoring Program to Ecology (inc. Progress Report Request)	0 days	Thu 9/1/05	Thu 9/1/05
4	Ecology Review of Proposed Groundwater Monitoring Program	12 days	Thu 9/1/05	Fri 9/16/05
5	Perform 3Q05 Groundwater Monitoring	3 days	Wed 9/28/05	Fri 9/30/05
6	Prepare 3Q05 Groundwater Monitoring and Sampling Report	34 days	Mon 10/3/05	Thu 11/17/05
7	Submit 3Q05 Groundwater Monitoring and Sampling Report to Ecology	0 days	Fri 11/18/05	Fri 11/18/05
8	Perform 4Q05 Groundwater Monitoring	3 days	Wed 1/11/06	Fri 1/13/06
9	Prepare 4Q05 Groundwater Monitoring and Sampling Report	41 days	Mon 1/16/06	Mon 3/13/06
10	Submit 4Q05 Groundwater Monitoring and Sampling Report to Ecology	0 days	Tue 3/14/06	Tue 3/14/06
11	Perform 1Q06 Groundwater Monitoring	3 days	Mon 3/27/06	Wed 3/29/06
12	Prepare 1Q06 Groundwater Monitoring and Sampling Report	40 days	Thu 3/30/06	Wed 5/24/06
13	Submit 1Q06 Groundwater Monitoring and Sampling Report to Ecology	0 days	Thu 5/25/06	Thu 5/25/06
14	Perform 2Q06 Groundwater Monitoring	3 days	Tue 6/27/06	Thu 6/29/06
15	Prepare 2Q06 Groundwater Monitoring and Sampling Report	40 days	Wed 7/5/06	Tue 8/29/06
16	Submit 2Q06 Groundwater Monitoring and Sampling Report to Ecology	0 days	Wed 8/30/06	Wed 8/30/06
17	Prepare Annual Groundwater Summary Report (3Q05-2Q06)	50 days	Thu 8/31/06	Wed 11/8/06
18	Submit Annual Groundwater Summary Report (3Q05-2Q06)	0 days	Wed 11/8/06	Wed 11/8/06
19	Perform 3Q06 Groundwater Monitoring	3 days	Tue 9/26/06	Thu 9/28/06
20	Prepare 3Q06 Groundwater Monitoring and Sampling Report	40 days	Fri 9/29/06	Thu 11/23/06
21	Submit 3Q06 Groundwater Monitoring and Sampling Report to Ecology	0 days	Thu 11/23/06	Thu 11/23/06
22	Perform 4Q06 Groundwater Monitoring	3 days	Tue 12/19/06	Thu 12/21/06
23	Prepare 4Q06 Groundwater Monitoring and Sampling Report	40 days	Fri 12/22/06	Thu 2/15/07
24	Submit 4Q06 Groundwater Monitoring and Sampling Report to Ecology	0 days	Thu 2/15/07	Thu 2/15/07
25	Perform 1Q07 Groundwater Monitoring	3 days	Tue 3/20/07	Thu 3/22/07
26	Prepare 1Q07 Groundwater Monitoring and Sampling Report	40 days	Fri 3/23/07	Thu 5/17/07
27	Submit 1Q07 Groundwater Monitoring and Sampling Report to Ecology	0 days	Thu 5/17/07	Thu 5/17/07
28	Perform 2Q07 Groundwater Monitoring	3 days	Tue 6/26/07	Thu 6/28/07
29	Prepare 2Q07 Groundwater Monitoring and Sampling Report	40 days	Fri 6/29/07	Thu 8/23/07
30	Submit 2Q07 Groundwater Monitoring and Sampling Report to Ecology	0 days	Thu 8/23/07	Thu 8/23/07
31	Prepare Annual Groundwater Summary Report (3Q06-2Q07)	50 days	Mon 8/27/07	Fri 11/2/07
32	Submit Annual Groundwater Summary Report (3Q06-2Q07)	0 days	Fri 11/2/07	Fri 11/2/07
33	**Preliminary Screening of Remedial Alternatives**	**91 days**	**Wed 8/10/05**	**Wed 12/14/05**
34	Prepare Preliminary Screening of Remedial Alternatives Technical Memorandum	72 days	Wed 8/10/05	Thu 11/17/05
35	Submit Preliminary Screening of Remedial Alternatives Technical Memorandum to Ecology	1 day	Fri 11/18/05	Fri 11/18/05
36	Ecology Review of Preliminary Screening of Remedial Alternatives Technical Memorandum	17 days	Mon 11/21/05	Tue 12/13/05
37	Conference Call to Discuss Preliminary Screening of Remedial Alternatives Technical Memorandum	1 day	Wed 12/14/05	Wed 12/14/05
38	**Phase III RI**	**281 days**	**Mon 12/19/05**	**Mon 1/15/07**
39	Prepare Phase III RI Work Plan	39 days	Mon 12/19/05	Thu 2/9/06
40	Submit Phase III RI Work Plan	0 days	Fri 2/10/06	Fri 2/10/06
41	Ecology Review of Phase III RI Work Plan	36 days	Mon 2/13/06	Mon 4/3/06
42	Obtain Phase III RI Access Agreements	50 days	Mon 4/10/06	Fri 6/16/06
43	Phase III RI Field Work (Phased Approach)	50 days	Mon 6/26/06	Fri 9/1/06
44	Prepare Phase III RI Report	70 days	Mon 9/4/06	Fri 12/8/06
45	Submit Phase III RI Report	0 days	Fri 12/8/06	Fri 12/8/06
46	Ecology Review of Phase III RI Report	26 days	Mon 12/11/06	Mon 1/15/07
47	**Interim Remedial Measures**	**500 days**	**Mon 1/23/06**	**Fri 12/21/07**
48	Prepare 2006 Interim Remedial Measures Work Plan	60 days	Mon 1/23/06	Fri 4/14/06
49	Submit 2006 Interim Remedial Measures Work Plan	0 days	Fri 4/14/06	Fri 4/14/06
50	Ecology Review of 2006 Interim Remedial Measures Work Plan	25 days	Mon 4/24/06	Fri 5/26/06
51	Public Comment Period	30 days	Mon 5/29/06	Fri 7/7/06
52	2006 Interim Remedial Measures Site Meeting (tentative date, with property owners, subcontractors)	0 days	Fri 7/7/06	Fri 7/7/06
53	2006 Interim Remedial Measures Field Work	45 days	Mon 8/7/06	Fri 10/6/06
54	Prepare 2006 Interim Remedial Measures Completion Report	110 days	Mon 10/9/06	Fri 3/9/07
55	Submit 2006 Interim Remedial Measures Completion Report	0 days	Fri 3/9/07	Fri 3/9/07
56	Ecology Review of 2006 Interim Remedial Measures Completion Report	26 days	Mon 3/12/07	Mon 4/16/07
57	Prepare 2007 Interim Remedial Measures Work Plan	53 days	Wed 9/27/06	Fri 12/8/06
58	Submit 2007 Interim Remedial Measures Work Plan	0 days	Fri 12/8/06	Fri 12/8/06
59	Ecology Review of 2007 Interim Remedial Measures Work Plan	26 days	Mon 12/11/06	Mon 1/15/07
60	Public Comment Period	30 days	Mon 1/15/07	Fri 2/23/07
61	2007 Interim Remedial Measures Site Meeting (tentative date, with property owners, subcontractors)	0 days	Tue 2/27/07	Tue 2/27/07
62	2007 Interim Remedial Measures Field Work	55 days	Mon 3/26/07	Fri 6/8/07
63	Prepare 2007 Interim Remedial Measures Completion Report	110 days	Mon 6/11/07	Fri 11/9/07
64	Submit 2007 Interim Remedial Measures Completion Report	0 days	Fri 11/16/07	Fri 11/16/07
65	Ecology Review of 2007 Interim Remedial Measures Completion Report	26 days	Fri 11/16/07	Fri 12/21/07
66	**Feasibility Study Report - Schedule To Be Determined Upon Completion of the Phase III RI and Interim Measures**	13 days	Wed 1/2/08	Fri 1/18/08



Project: Bee-Jay Scales Site 2006-2007 Project Schedule
Date: Fri 4/7/06

Task | Milestone | Rolled Up Task | Rolled Up Progress | External Tasks | Group By Summary
Progress | Summary | Rolled Up Milestone | Split | Project Summary