



WASHINGTON STATE
DEPARTMENT OF
E C O L O G Y

Southwest Regional Office
Toxics Cleanup Program
PO Box 47775
Olympia, WA 98504-7775
360-407-6240

TRANSMITTAL MEMO

Date: May 10, 2006

TO: Mr. Dana Thurman
Chevron Texaco Products Company

RE: *Chevron 9-5311*
SW0733

Subject: Explanation of Timeline

NOTE: The date on the determination letter reflects the date the decision was made and the billing process began. We do not release determination letters until payment has been received.

Ecology Determination date: March 17, 2006

Ecology Billing Sent: April 12, 2006

Your Payment Processed: May 10, 2006

Ecology Determination letter mailed/sent: May 10, 2006



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

CERTIFIED MAIL

March 17, 2006

Dana Thurman
ChevronTexaco Products Company
6001 Bollinger Canyon Road, K 2236
San Ramon, CA 94583

**Re: Further Action Determination under WAC 173-340-515(5) for the following
Hazardous Waste Site:**

- Name: Chevron 9-5311
- Address: 1018 Plum Street, Olympia, WA
- Facility/Site No.: 25489377
- VCP No.: SW0733

Dear Mr. Thurman:

Thank you for submitting your independent remedial action report for the Chevron 9-5311 facility (Site) for review by the State of Washington Department of Ecology (Ecology) under the Voluntary Cleanup Program (VCP). Ecology appreciates your initiative in pursuing this administrative option for cleaning up hazardous waste sites under the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

This letter constitutes an advisory opinion regarding whether further remedial action is necessary at the Site to meet the substantive requirements of MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC. Ecology is providing this advisory opinion under the specific authority of RCW 70.105D.030(1)(i) and WAC 173-340-515(5).

This opinion does not resolve a person's liability to the state under MTCA or protect a person from contribution claims by third parties for matters addressed by the opinion. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70.105D.040(4). The opinion is advisory only and not binding on Ecology.



Ecology's Toxics Cleanup Program has reviewed the following information regarding the Site:

1. Pacific Environmental Group, Inc., Environmental Site Assessment; October 5, 1995.
2. Gettler-Ryan, Inc., Groundwater Monitoring and Sampling Report[s]; May 2005, January 2001, November 2000, September 2000, June 2000, March 2000, November 1999, August 1999, May 1999.
3. Delta Environmental Consultants, Inc., VCP Closure Submittal[s]; March 21, 2002; August 21, 2001.
4. Cambria Environmental Technology, Inc., Subsurface Site Assessment; April 29, 1999.

The documents listed above will be kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. Appointments can be made by calling the SWRO resource contact at (360) 407-6365.

The Site is defined by the extent of contamination caused by the following release(s):

- Total Petroleum Hydrocarbons as Gasoline in Soil and Ground Water
- Benzene in Soil and Ground Water

The Site is more particularly described in Enclosures to this letter, which include a detailed Site diagram. The description of the Site is based solely on the information contained in the documents listed above.

Based on a review of the independent remedial action report and supporting documentation listed above, Ecology has determined that the independent remedial action(s) performed at the Site are not sufficient to meet the substantive requirements contained in MTCA and its implementing regulations, Chapter 70.105D RCW and Chapter 173-340 WAC, for characterizing and addressing any of the contamination at the Site. Therefore, pursuant to WAC 173-340-515(5), Ecology is issuing this opinion that further remedial action is necessary at the Site under MTCA.

In April and May of 1995, the fourth underground storage tank was installed south of the existing complex and the used oil collection tank was removed and re-installed. Other work included removing and re-installing the fuel/vapor delivery piping and pump islands.

Sixteen soil samples were collected from the trenching and beneath the pump islands.

Concentrations in these samples ranged from non-detect to 9900 milligrams per kilogram (mg/kg) gasoline, and non-detect to 990 mg/kg benzene. Four soil samples collected from the west ends of the fuel delivery line trenches, one soil samples collected beneath the fuel delivery piping and three soil samples collected beneath the central and northern pump islands contained concentrations of TPH-gasoline exceeding the cleanup level. All but 2 of the soil samples collected beneath the pump islands and fuel delivery piping contained concentrations of one or more BTEX compounds exceeding cleanup levels.

Significant gasoline and benzene contamination has been documented under the pump islands and fuel/vapor delivery piping systems, but has not been fully characterized.

The elevated water table made it necessary to de-water the gasoline UST complex during construction activities. Over the course of the project approximately 294,000 gallons of water was pumped and stored in Baker tanks on site. Analytical data indicated the water had been impacted by hydrocarbons. Three samples of untreated water were analyzed for hydrocarbons and concentrations ranged from 2.3 to 14.0 mg/L gasoline and from between 0.025 to 1.4 mg/L benzene.

In March of 1999, four borings were completed as monitoring wells in order to better characterize possible impacts to soil and groundwater. The gradient has remained very consistently northeast over the years, only wavering slightly. However, it appears the wells that are currently installed would not likely intercept the gasoline contamination remaining on site, due to the fact it is located on the north and west side of the pump islands and piping system. The gradient would likely carry the contamination right between wells 2 and 4. Although groundwater monitoring data consistently reports undetectable concentrations of petroleum constituents, this may not be representative of actual groundwater conditions near the source area.

Please note that even though some characterization work was completed prior to 2001, because the site has not yet been fully characterized and remediated, the new 2001 MTCA Residential cleanup standard will apply at this site. The 2001 MTCA standards for gasoline and benzene in soil are 30 mg/kg and 0.03 mg/kg, respectively. The 2001 MTCA standards for gasoline and benzene in groundwater are 0.8 mg/L and 0.005 mg/L, respectively. Please be advised that in order to assess compliance with the 2001 MTCA standard, testing must be completed according to MTCA Table 830-1: Required Testing for Petroleum Releases. It does not appear testing requirements have been met with regard to fuel additives and oxygenates.

Please submit a work plan to complete characterization of the site soil and groundwater in accordance with Table 830-1. Please include proposals for soil analyses and additional groundwater well installation locations and construction diagrams.

In accordance with WAC 173-340-840(5) and Ecology Toxics Cleanup Program Policy 840 (Data Submittal Requirements), data generated for Independent Remedial Actions shall be submitted in

Chevron 9-5311
March 17, 2006
Page 4

both a written and electronic format. For additional information regarding electronic format requirements, see the website <http://www.ecy.wa.gov/eim>. All laboratory analyses shall be performed by the State of Washington Certified Laboratory for each analytical method used.

Please note that this opinion is based solely on the information contained in the documents listed above. Therefore, if any of the information contained in those documents is materially false or misleading, then this opinion will automatically be rendered null and void.

The state, Ecology, and its officers and employees make no guarantees or assurances by providing this opinion, and no cause of action against the state, Ecology, its officers or employees may arise from any act or omission in providing this opinion.

Again, Ecology appreciates your initiative in conducting independent remedial action and requesting technical consultation under the VCP. As the cleanup of the Site progresses, you may request additional consultative services under the VCP, including assistance in identifying applicable regulatory requirements and opinions regarding whether remedial actions proposed for or performed at the Site meet those requirements.

If you have any questions regarding this opinion, please contact me at (360) 407-6261.

Sincerely,



Lisa Pearson
Project Engineer
Toxics Cleanup Program
Southwest Regional Office

LP/ksc:Chevron95311 Opinion

Enclosures: Site Description Narrative
Map of 1995 sampling, Pacific Environmental
Map of Groundwater Monitoring Wells, Gettler-Ryan, Inc.

Cc: Charles Cline, Department of Ecology
Bob Warren, Department of Ecology
Trish Akana, Department of Ecology (SW0733)

Enclosure A

SITE DESCRIPTION NARRATIVE

This site is located downtown Olympia, at 1018 Plum Street, Olympia, WA. This site is an active fuel and service station and is surrounded by commercial properties in the main downtown area.

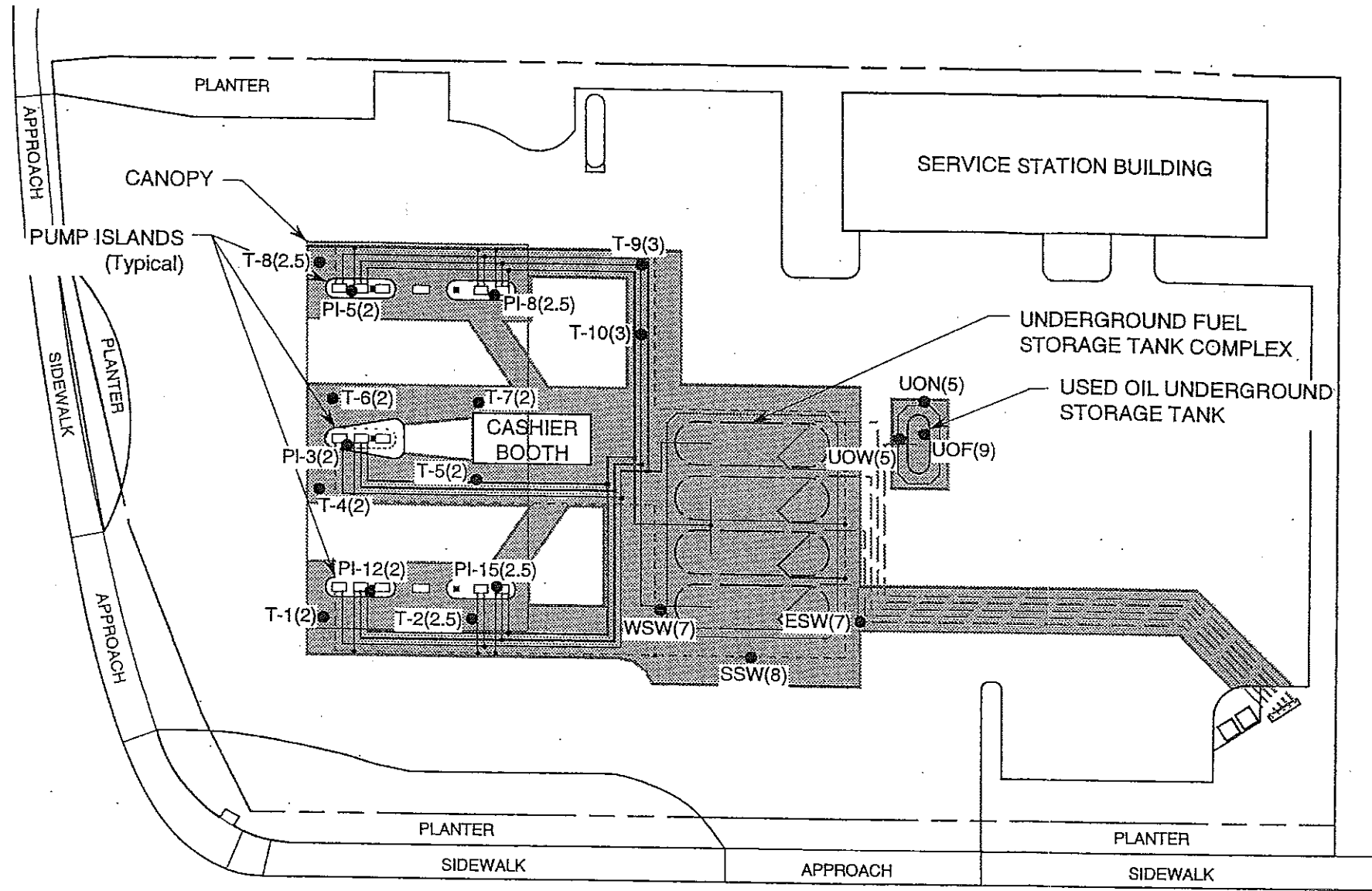
An unknown amount of gasoline and benzene remain on site in soils under the western and northern pump islands and fuel/vapor delivery lines (see next Enclosure). It is unclear at this time whether groundwater in the vicinity of the soil contamination is impacted.

The attached figure highlights the soil samples with concentrations exceeding MTCA Method A standards. Concentrations in these samples ranged from non-detect to 9900 milligrams per kilogram (mg/kg) gasoline, and non-detect to 990 mg/kg benzene. Four soil samples collected from the west ends of the fuel delivery line trenches, one soil sample collected beneath the fuel delivery piping and three soil samples collected beneath the central and northern pump islands contained concentrations of TPH-gasoline exceeding the cleanup level. All but 2 of the soil samples collected beneath the pump islands and fuel delivery piping contained concentrations of one or more BTEX compounds exceeding cleanup levels. Excavated soil consisted predominantly of silty, gravelly sand and sand. Eleven product dispensers were completely removed (and replaced) along with the associated concrete islands.

In March of 1999, four soil borings were completed as monitoring wells in order to better assess the conditions of site soil and groundwater. See attached figure. Borings 2 and 3 had detections of petroleum constituents in soil between 4 and 5 feet bgs. Boring 3 had concentrations of diesel and heavy oil at 249 and 434 mg/kg, respectively (this is located east of the waste oil tank). Boring 2 had concentrations of gasoline and heavy oil at 28 and 124 mg/kg, respectively. The only groundwater concentration reported was 0.0054 mg/L benzene in monitoring well 2, located west of the dispenser islands. However, the gradient is calculated according to the water elevation in each monitoring well and reportedly is consistently north-northeast to northeast. This means the wells that are currently installed would not likely catch the gasoline contamination remaining on site due to the fact that it is located on the north and west side of the pump islands and piping system. The gradient would likely drag the contamination right between wells 2 and 4. Although groundwater monitoring data consistently reports undetectable concentrations of petroleum constituents, this may not be representative of actual groundwater conditions near the source area.



Plum Street



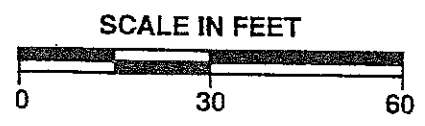
LEGEND

- PRODUCT LINES
- - - - VAPOR RETURN LINES
- - - - VENT LINES
- UOW(5) ● SOIL SAMPLING LOCATION AND DESIGNATION
- (5) SOIL SAMPLING DEPTH IN FEET
- APPROXIMATE LIMIT OF EXCAVATION

NOTE: Base Map Provided by GROUNDWATER TECHNOLOGY, INC.



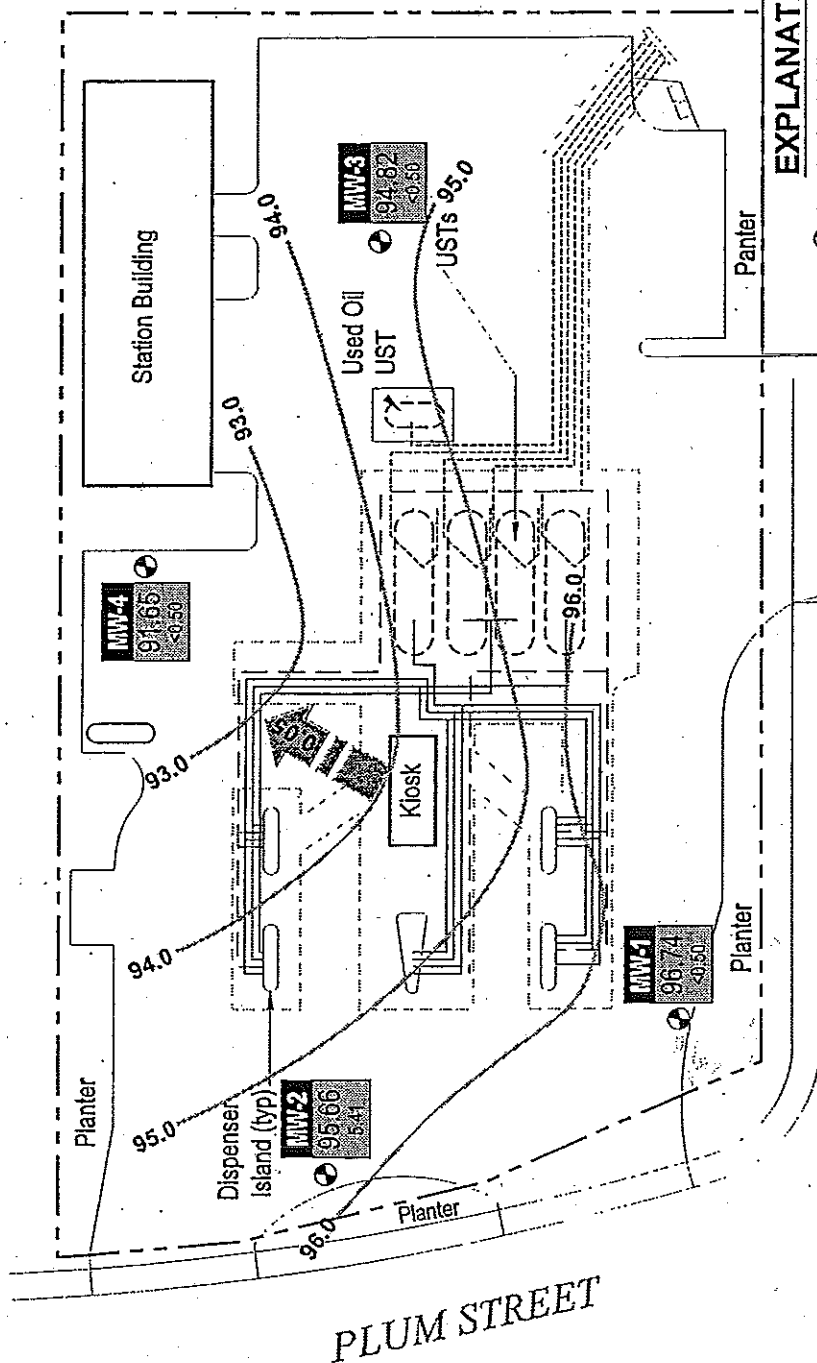
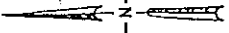
PACIFIC ENVIRONMENTAL GROUP, INC.



CHEVRON SERVICE STATION #9-5311
1018 Plum Street
Olympia, Washington

SOIL SAMPLE LOCATION MAP

FIGURE:
2
PROJECT:
520-120-1B

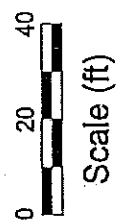


EXPLANATION

- Monitoring Well Location
- Product Lines
- Vapor Return Lines
- Vent Lines
- Approximate Limit Of Excavation (1995)
- 94.0 Groundwater Elevation Contour, feet
- Groundwater Flow Direction and Gradient
- Well ID
- Groundwater Elevation, feet
- Benzene Concentration, parts per billion (ppb)

UNION AVENUE

PLUM STREET



FIGURE

3

\\CHEVRON\9-5311\Figs_GW_Map.DWG

Chevron Service Station 9-5311
 1018 Plum Street
 Olympia, Washington



C A M B R I A

**Groundwater Elevation
 Contour Map**
 March 18, 1999

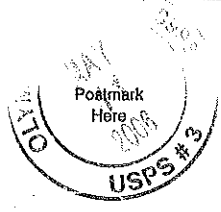
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Lisa Pearson USE

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to Dana Thurman
 of ChevronTexaco Products Company
 of 6001 Bollinger Canyon Road, K 2236
 of San Ramon, CA 94583

PS Form 3811, February 2004 See Reverse for Instructions

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<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> <i>Thomas Wallis</i> <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Thomas Wallis</i> C. Date of Delivery <i>MAY 15 2006</i></p> <p>D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below: P O BOX 6001 SAN RAMON CA 94583-0607</p>
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