



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 5, 2017

Don Wyll
Leidos Engineering LLC
18912 North Creek Parkway, Suite 101
Bothell, WA 98011

**Re: Supplemental Remedial Investigation Work Plan – Chevron Bulk Plant USA 1348
Comments**

- **Site Name:** Chevron Bulk Plant USA 1348
- **Site Address:** 1656 E J Street, Tacoma, WA 98421-1616
- **Facility/Site No.:** 1234
- **Cleanup Site No.:** 3762

Dear Mr. Wyll:

Thank you for submitting the Supplemental Remedial Investigation Work Plan (Work Plan) for the Chevron Bulk Plant USA 1348 cleanup site (Site) on May 28, 2017. The Work Plan was developed in order to facilitate additional site characterization activities in response to the Washington State Department of Ecology's (Ecology) comments on the Draft Remedial Investigation (RI) Report and follow up comments on initial drafts of the Work Plan on February 22, 2016, July 21, 2016, and March 27, 2017, respectively.

This letter shall serve as Ecology's approval of the *Supplemental Remedial Investigation Work Plan*, dated May 26, 2017, contingent upon the following items:

- Page 2 of the Work Plan states, "Potentiometric maps depicting the shallow upper aquifer at low and high tide conditions are presented as Figures 1 and 2. The data collected during this study indicate that the shallow aquifer gradient is towards the north-northwest." However, both Figures 1 and 2 indicate that groundwater is flowing northwest, north, and northeast of the southeast portion of the Site. In addition, it states, "At high tide conditions the gradients shifts to the north-northwest. At low tide conditions the gradient is to the north-northeast towards the Wheeler-Osgood Waterway." However, Figures 3 and 4 indicate that gradients are towards the north-northeast during high tide, and north-northwest during low tide. **Please reevaluate and correct these statements in the next iteration of the *Remedial Investigation Report*.**

- Page 5 of the Work Plan states, "An electronic copy of the site HASP (Health and Safety Plan) will be provided to Ecology for review prior to the commencement of field work." **Please submit the electronic HASP to Ecology no later than two weeks prior to the start of field mobilization.**
- In response to Ecology's March 27, 2017 Work Plan comments, the Indirect Groundwater-Surface Water Interface section was added to Page 7 of the Work Plan. Ecology agrees that storm sewer sampling will be useful for investigating this pathway. However, **a strategy for evaluating the potential for the utility bedding material to form a preferential pathway of contaminated groundwater flow may need to be considered further in the Remedial Investigation Report and/or Cleanup Action Plan.**
- Page 8 of the Work Plan notes that carcinogenic polycyclic aromatic hydrocarbons (cPAHs), 1,2, dibromoethane (EDB), 1,2, dichloroethane (EDC), and naphthalenes were sampled for and analyzed in groundwater. However, Ecology's online database, Environmental Information Management System (EIM), does not include any samples for these parameters. **Please submit all sample results used in the remedial investigation electronically to Ecology's EIM system.** The omitted sample results from previous investigations shall be submitted at the same time or prior to submitting the sample results from the upcoming investigation (60 days after receipt of the validated laboratory reports from the upcoming investigation).

- Page 10 of the Work Plan indicates that an extension will be requested if field work cannot begin within 90 days of approval of the work plan. **In order to show sufficient efforts toward obtaining access agreements and to justify the need for an extension, Ecology requests a monthly email status update until field work begins describing the progress of the access negotiations and/or any other items that may delay the field work schedule.** The monthly status updates may be concluded once field work begins.

If you have questions regarding the comments provided, please contact me at (360) 407-7529 or matthew.morris@ecy.wa.gov.

Sincerely,



Matthew Morris, P.E.
Cleanup Project Manager
Department of Ecology
Southwest Regional Office Toxics Cleanup Program

MM:kb

By Certified Mail: [91 7199 9991 7037 0291 6265]

cc: Dan Carrier, Chevron Environmental Management Company
Rebecca S. Lawson, P.E., LHG, Ecology
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