



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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April 23, 2018

Mr. Mark Horne  
Project Manager  
Chevron Environmental Management Company  
6001 Bollinger Canyon Rd., Room C2050  
San Ramon, CA 94583

**Re: Agreed Order DE 13815, Formal Notification of Extension for Remedial Investigation Field Activities:**

- Name: **Chevron 90129**
- Address: **4700 Brooklyn Ave NE Seattle WA 98105**
- County Assessor's Parcel Number: **8816400985**
- Facility/Site No.: **81966648**
- Cleanup Site No.: **10632**

Dear Mr. Horne:

On January 15, 2018, Ecology received a Remedial Investigation status update from your environmental consultant (Leidos).

This status update stated that between January 12, 2018 and February 9, 2018 the following work was completed at 4700 Brooklyn Ave, Seattle:

- Installation of seven new monitoring wells along NE 47<sup>th</sup> Street and Brooklyn Avenue, in accordance with the approved RI Work Plan. The monitoring wells installed were MW-17, MW-18, MW-19, MW-25, MW-26, MW-27, and MW-28.
- Proposed monitoring wells MW-21, MW-22, MW-23, MW-24, and MW-20 were not installed due to utilities located both underground and overhead.
- One vapor point (SVP-2) was installed adjacent to the Site on NE 47<sup>th</sup> Street.
- Proposed vapor point SVP-1 (located in the alley) was not installed due to a high density of utilities located underground.
- Two attempts were made to collect a vapor sample from SVP-2, however water vapor blocked the sampling manifold during both attempts. No sample was able to be collected.



- The status update also discussed the five groundwater monitoring wells that were an integral part of your Remedial Investigation Work Plan (RIWP) were not installed as required in the RIWP due to above and below ground utilities.

On February 16, 2018, The Washington State Department of Ecology (Ecology) Toxics Cleanup Program, received your written request to extend Remedial Investigation Field Activities to an additional 180-days after Ecology approval of the RIWP.

Note; this is contrary to the following Sections of the Agreed Order:

Agreed Order DE 13815 Section VIII Terms and Conditions, Sub-section J Extension of Schedule:

- An extension of schedule shall be granted only when a request for an extension is submitted in a timely fashion, generally at least thirty (30) days prior to expiration of the deadline for which the extension is requested, and good cause exists for granting the extension

Agreed Order DE 13815 Exhibit C – Schedule of Deliverables, Remedial Investigation Field Investigations Completed no later than 180 days after Final Remedial Investigation Work Plan

- Remedial Investigation Field Activities were scheduled to have been completed by January 22, 2018
- Remedial Investigation Field Activities occurred between January 12, 2018 and February 9, 2018

The Potentially Liable Persons (PLPs), FH Brooklyn, LLC (FH Brooklyn) and Chevron Environmental Management Company (CEMC) are signatories to the Agreed Order (AO), with the Washington State Department of Ecology (Ecology) at the Chevron 90129 Cleanup Site.

The project coordinators for Ecology and CEMC conferred to resolve the issues and both parties have come to the mutual understandings on the following:

- The Remedial Investigation Field Activities as detailed in the Ecology approved RIWP were to have been completed by January 22, 2018.
- If these Field Activities could not be completed by January 22, 2018, CEMC should have requested an extension prior to that date.
- CEMC will be more proactive in obtaining city permits and will communicate with Ecology's project coordinator in a timelier manner in order to meet project goals.
- CEMC will also insure that any future requests for schedule modifications will be made in a timely manner as described in Section VIII (J) Extension of Schedule.

After reviewing your proposal and request to extend Remedial Investigation Field Activities, Ecology is approving extensions to the following Remedial Investigation Field activities:

### **Groundwater Monitoring Well Installation**

Monitoring wells MW-20 through MW-24 which were not installed as per the RIWP shall be installed at the locations depicted in Figure 1 - Proposed Groundwater Monitoring Well Locations and Soil Vapor Probe (Figure 1) within 60-days of receipt of this letter.

The exact locations and installation of selected monitoring wells located along University Avenue (Figure 1) will be dependent on data obtained from groundwater sampling of monitoring wells MW-21 through MW-24. Depending on analytical results for MW-20, additional well(s) may be necessary to the west and south of MW-20.

Ecology has also identified a data gap in groundwater characterization north of MW-12. An investigation north of this monitoring well is required. Direct push grab groundwater sample locations will be installed north of MW-12 (Figure 1) either prior to or in conjunction with the interim action excavation activities on the property. If the grab groundwater samples are below Model Toxics Control Act (MTCA) Method A cleanup levels then the proposed monitoring well location as depicted in Figure 1 in the Safeway parking lot will not be needed. The PLPs shall obtain an access agreement with the Safeway/Albertson's property owners to install a monitoring well on their property within 90-days of receipt of this letter.

### **Halogenated Volatile Organic Compounds (HVOC) Plume and Vapor Intrusion**

#### **Assessment**

Recent off-property groundwater data has shown concentrations of gasoline range petroleum hydrocarbons, and halogenated volatile organic compounds (HVOCs), namely; Tetrachloroethylene (PCE), Trichloroethylene (TCE), and Vinyl chloride (VC), above MTCA Method A cleanup levels have comeingled.

- Ecology will require the PLPs to fully characterize the nature and extent, and source of the HVOC plume within 90-days of receipt of this letter.

Agreed Order DE 13815 Exhibit B – Scope of Work, Task 3. Remedial Investigation.

- The PLPs will conduct an RI that meets the requirements of WAC 173-340-350(7) and WAC 173-204-560 according to the Work Plan approved by Ecology (Task 1). The RI will determine the nature and extent of contamination exceeding preliminary MTCA cleanup levels, and any other regulatory requirements. The RI will provide sufficient data and information to define the nature and extent of contamination.

Additionally, the PLPs shall submit within 90-days of this letter a comprehensive draft vapor intrusion assessment (VIA) work plan for Ecology's review at the following locations:

- Carson Cleaners, located west of MW-17 where PCE and TCE showed concentrations of 120µg/L and 35 µg/L respectively,
- Christ Episcopal Church, located south of MW-26 where PCE, TCE, and VC showed concentrations of 370 µg/L, 2,100 µg/L, and 59 µg/L respectively,
- The mixed apartment/retail building located southeast of MW-26 and south of MW-25,
- The Bank of America building located east of MW-16 and north of MW-25.

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The draft VIA work plan will include a schedule for field activities. The work plan should include both sub-slab and indoor air analysis. CEMC will need to obtain access agreements with the property owners to perform this analysis.

### **Groundwater Monitoring**

The PLPs shall perform groundwater monitoring at the Site on a weekly basis until steady-state conditions are established:

- MW-17, MW-25, MW-26, and MW-28 will be used to track dewatering process and detect any changes in water quality.
- These four monitoring wells will be gauged daily during dewatering activities to monitor the propagation of drawdown outside of the excavation.
- Additionally, these four wells will be sampled weekly during initial dewatering activities and analyzed for GRO, DRO, ORO, and VOCs (EPA Method 8260).
- Once steady-state conditions are established, the PLPs can request Ecology approval to reduce the sampling frequency to monthly.
- The monitoring results and any changes to the monitoring will be communicated to Ecology at a minimum frequency of monthly.

If you have any questions regarding this decision, please contact me at (425) 649-4446, or email at [damy461@ecy.wa.gov](mailto:damy461@ecy.wa.gov).

Sincerely,

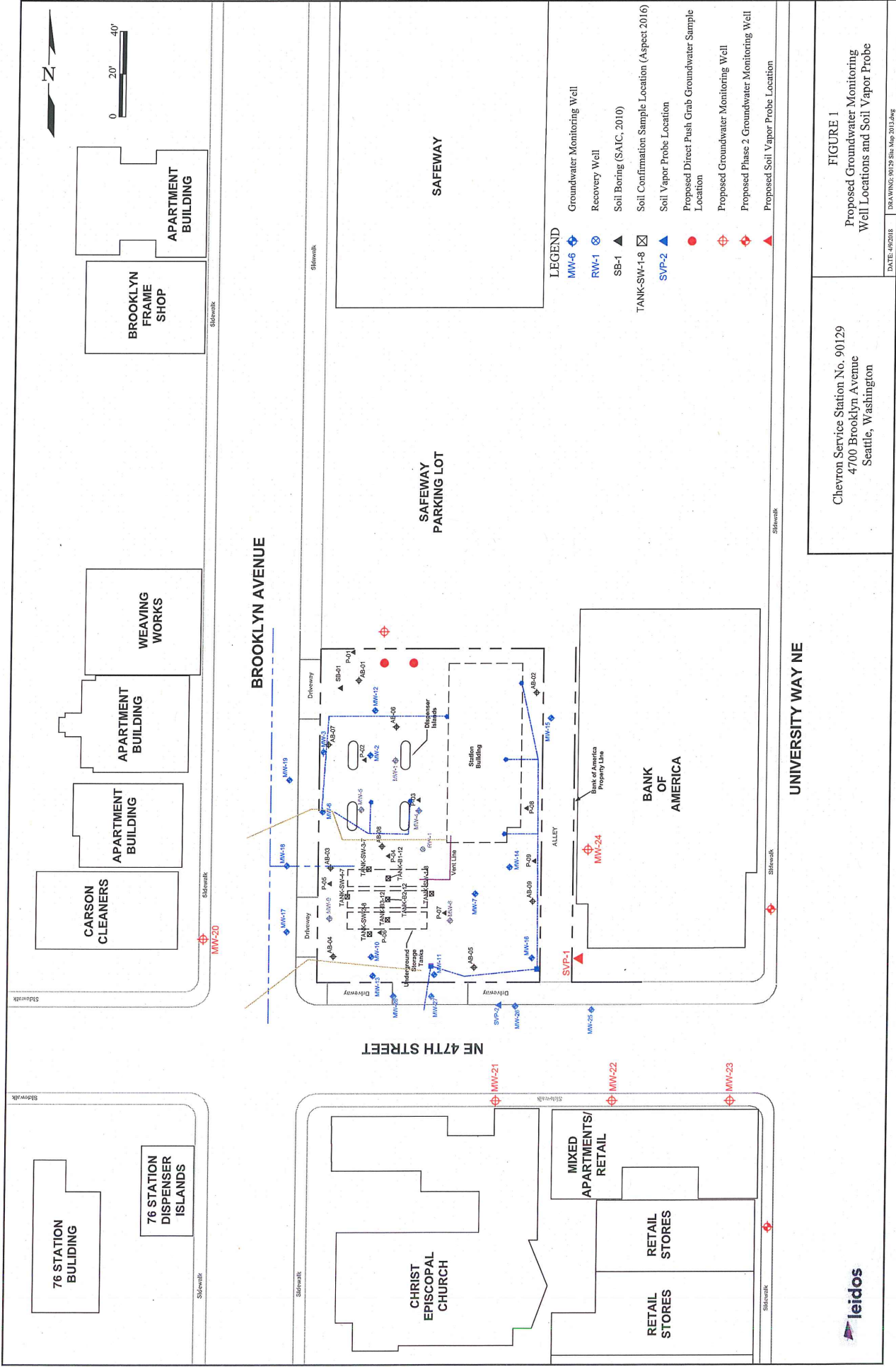


Dale Myers  
Project Manager  
NWRO Toxics Cleanup Program

Attachment: Figure 1, Proposed Groundwater Monitoring Well Locations and Soil Vapor Probe

By Certified Mail: [9171 9690 0935 0132 2129 58]

ecc: Eran Fields (Fields Holdings LLC)  
Robert Goodman (Rogers Joseph O'Donnell)  
William Joyce (Joyce Ziker Parkinson)  
Adam Griffin (Aspect Consulting LLC)  
Louise Bardy (Ecology)  
Bob Warren (Ecology)  
Allyson Bazan (WA AAG)



**FIGURE 1**  
Proposed Groundwater Monitoring Well Locations and Soil Vapor Probe

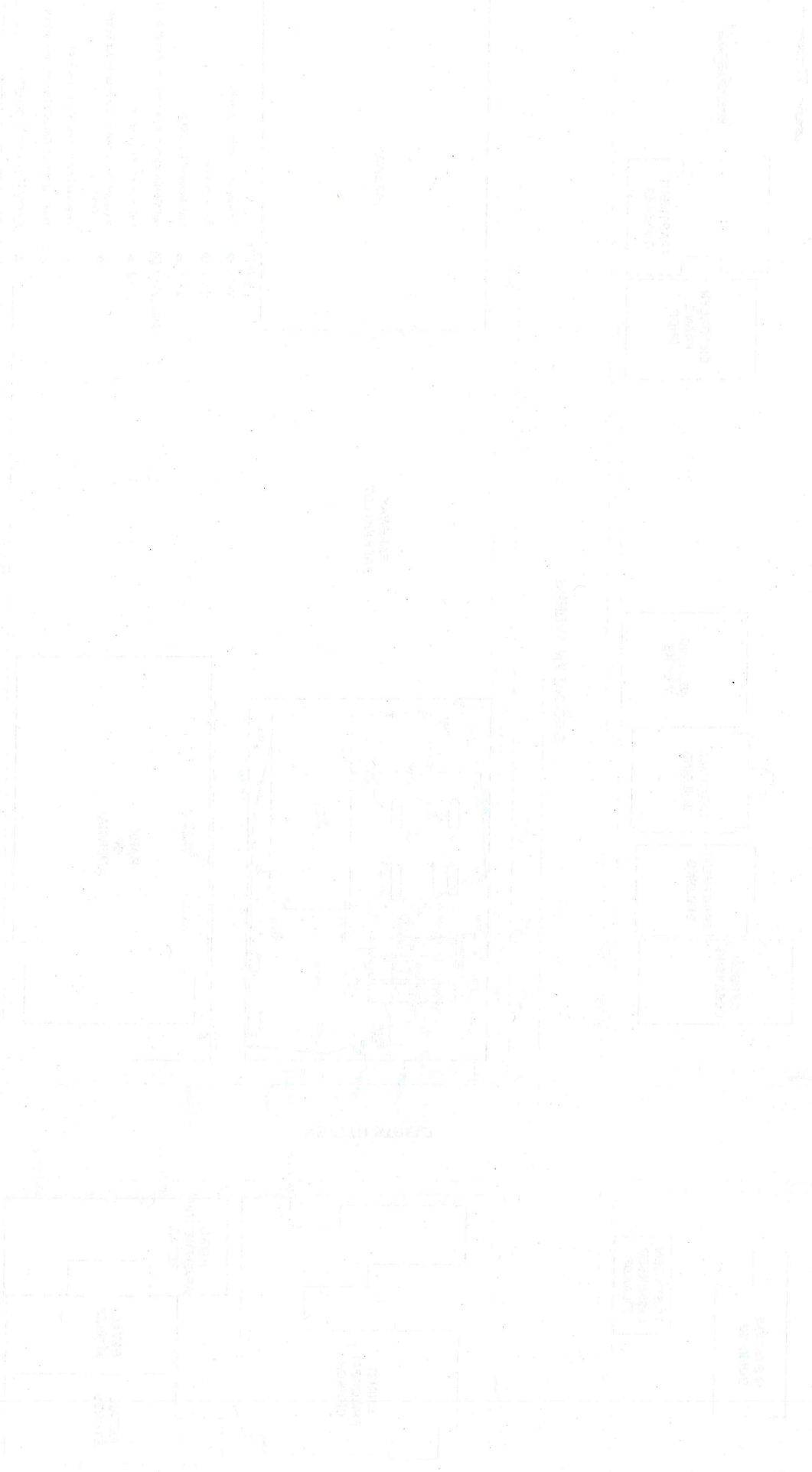
Chevron Service Station No. 90129  
4700 Brooklyn Avenue  
Seattle, Washington

DATE: 09/20/18 DRAWING: 90129 Site Map 3013.dwg

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