



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 6, 2019

Leah Vigoren
Project / Construction Manager
Wood Environment & Infrastructure Solutions, Inc.
600 University Street, Suite 600
Seattle, WA 98101

**Re: Draft Final Site Characterization/Focused Feasibility Study Report,
ExxonMobil/ADC Property, Ecology Site ID No. 2728 Everett, Washington Project
No. 6103180009, ExxonMobil Oil Corporation/American Distributing Company –
Redline Changes**

Dear Leah Vigoren:

Thank you for submitting the subject document with redline changes for the Department of Ecology's (Ecology) review and comment. At our last meeting on the subject document in October 2018, Ecology expressed the inclination to accept Remedial Alternative 1, if the alternative could be revised and include more detail.

Ecology has reviewed the revisions to Remedial Alternative 1, and have the following concerns:

1. Proposed confirmation soil sampling method.

The proposed method of grab sampling with an open excavator bucket, which is then dragged through two to five feet of water column, is not acceptable. Such a sample would not represent soil conditions at the bottom of the excavation or side walls. Ecology suggests you remove the sentence regarding this sampling method from the document, and propose another means of collecting conformational soil samples from the excavation in a subsequent sampling and analysis report.

2. Remediation Levels – Soil Saturation Concentrations

Remediation levels for termination of soil excavation are based on the residual saturation concentration of LNAPL.

Based on the type of soils typically present at the Site and TPH concentrations observed historically in soil samples collected at the Site, residual saturation levels in soils for the various petroleum groups at the site are identified as follows:

TPH-G ranges from 2,470 to 3,410 mg/kg (Broast and DeVaul, 2000).

TPH-D ranges from 4,800 to 8,840 mg/kg (Broast and DeVaul, 2000).

TPH-O ranges from 5,810 to 11,000 mg/kg (Broast and DeVaul, 2000).

Your proposal to use the upper limits of these ranges as remediation levels without any basis is unacceptable. In the absence of site-specific data, it is only prudent to use the lower limits in this case. Ecology strongly recommends using the lower limits as the remediation levels.

3. Contingency Planning

Contingency planning that would require ExxonMobil/ADC to work with affected landowners to utilize opportunities for removal of LNAPL or residually saturated soil from currently inaccessible areas must be included in the Alternative. ExxonMobil/ADC should work with affected landowners to identify construction projects that would allow access to currently inaccessible areas to explore possible LNAPL removal. Ecology considers this to be an important addition to the Risk Management Plan.

4. Environmental Covenant

The remedial alternative proposes the use of an environmental covenant, which includes restrictive covenants to supplement the proposed partial removal action in order to make the alternative protective of human health and the environment.

The site extends to properties that are owned by other parties. Please consult with these landowners to obtain their consent to the proposed environmental covenant on their properties.

In line with Model Toxics Control Act (MTCA), please contact the city or county department that has planning authority for real property, for comment on whether or not the proposed restrictive covenant is consistent with current and future land use plans.

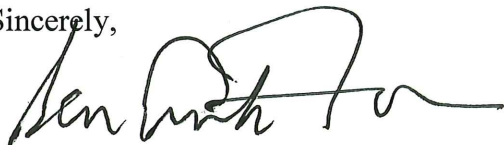
5. Groundwater Conditional Point of Compliance (CPOC)

Ecology does not concur with the proposed number of CPOC monitoring wells. The appropriate number of CPOC monitoring wells and locations would be determined at the CAP and/or engineering design phase.

Leah Vigoren
May 1, 2019
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Please incorporate our comments and recommendations in the next revision and submit the document for our review and approval. You may reach me at ben.forson@ecy.wa.gov or at 360-407-7227 if you need further clarification or have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Forson". The signature is fluid and cursive, with a large loop at the end.

Ben Forson
Toxics Cleanup Program

