



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

*Northwest Regional Office 3190 160th SE Bellevue, Washington 98008-5452 (425) 649-7000*

September 30, 2019

Mr. Russell Shropshire  
Leidos, Inc.  
18939 120th Avenue NE, Suite 112  
Bothell, WA 98011

**Re: Agreed Order DE 14246, Formal Notification of a 180-day Extension for Completion of Remedial Investigation Field Activities:**

- Name: Newman's Chevron
- Address: 2021 6th ST Bremerton WA 98310
- Kitsap County Assessor's Parcel Number 3717-002-015-0106
- Facility/Site No.: 1436359
- Cleanup Site No.: 5252

Dear Mr. Shropshire:

On August 28, 2019, The Washington State Department of Ecology (Ecology) Toxics Cleanup Program, received your written request for a 180-day extension for completion of Remedial Investigation (RI) Field Activities, Agreed Order (AO) deliverable schedule that Nordic Properties, Inc., Victory Business Park, LLC and Chevron Environmental Management Company (PLPs) are signatories to with the Washington State Department of Ecology (Ecology) at the Newman's Chevron Cleanup Site.

This is the third request for extension to complete the RI field activities at the Newman's Chevron Site.

- On April 25, 2019, Ecology granted the PLPs a 90-day extension,
- In July 2019, Ecology gave the PLPs an additional 30-day extension.
- Ecology notes that all field activities detailed in the Ecology approved RI Work Plan were accomplished on time, and meet the due date in Exhibit C of the Agreed Order.
- It is understood that the reason for these extensions is due to the fact that the nature and extent of soil contamination at the Site is much greater than anticipated.

Ecology understands that you will develop and submit to Ecology a detailed addendum to the RI Work Plan in October 2019.

Your email dated September 9, 2019, provided further detail of planned work at the Site and included a preliminary schedule for performing this work.

Ecology understands you are compiling data to prepare summary tables of the laboratory results for soil samples collected during the July 2019 RI field event. Whereas those tables are currently not available, you have provided the following data summary highlighting those results exceeding MTCA Method A cleanup levels (attached Revised Figure 1).

- **SB-11** - Gasoline-range organics (GRO) were detected at a concentration of 3,200 milligrams per kilogram (mg/kg) at a depth of 20 feet below ground surface (bgs).
- **SB-13** – GRO were detected at a concentration of 460 mg/kg at 12 feet bgs.
- **SB-16** – GRO were detected at a concentration of 1,500 mg/kg at 9 feet bgs.
- **SB-17** – GRO were detected at a concentration of 210 mg/kg at 14.5 feet bgs, 1,400 mg/kg at 19.5 feet bgs, and 140 mg/kg at 24 feet bgs. Diesel-range organics (DRO) were also detected at this location at a concentration of 3,500 mg/kg at 19.5 feet bgs, and 2,800 mg/kg at 24 feet bgs.
- **SB-20** – GRO were detected at a concentration of 46 mg/kg at 8 feet bgs and 170 mg/kg at 14 feet bgs.

Based on these results, you concluded that additional investigation will be necessary to delineate the extent of petroleum impacts to soil at the Site. In addition, further assessment of vapor intrusion (VI) potential is warranted based on the proximity of residential housing to soil impacts detected at soil boring SB-13.

Further RI field activities at the Site would likely include the following:

On the 2005/2007 6<sup>th</sup> Street Property

- One or more additional soil borings will be completed to delineate the eastern extent of GRO impacts detected at soil boring SB-11.
- Tier I VI sampling will be conducted to assess potential petroleum hydrocarbon impacts to shallow soil vapor.

To the south of the Site

- Approximately three soil borings will be completed to delineate the lateral extent of GRO impacts detected at soil boring SB-13 (this work is expected to require coordination of property access to one or more properties located to the south of the alley, in the vicinity of SB-13).
- Tier I VI sampling will be conducted to assess potential petroleum hydrocarbon impacts to shallow soil vapor.

In the western portion of the Site near the undocumented UST basin

- Approximately three additional soil borings will be completed to delineate the lateral extent of GRO and DRO impacts detected in the northern and western portions of the undocumented UST basin (this work is expected to require one or more soil borings in the Naval Avenue right-of-way, which will likely require a temporary closure of one or more of the north-bound travel lanes).

You stated that your primary justification for requesting a 180-day extension is the time that will be necessary to coordinate access for sampling on one or more of the properties located to the south of soil boring SB-13. Ecology notes that access coordination for the 2005/2007 6<sup>th</sup> Street property required approximately six months to complete. You state that the overall timeframe needed to complete the scope of work described above will require at least 180 days.

The following is a draft conceptual schedule that identifies the currently anticipated tasks and their associated timeframes for completion of the RI field activities:

#### September 2019

- Planning of additional RI field activities, including initiation of property access coordination for soil and Tier I VI sampling south of soil boring SB-13

#### October 2019

- Submit agency review draft of RIWP Addendum # 2 to Ecology (expected submittal date of October 15, 2019)
- Continue property access coordination

#### November 2019

- Implementation of RI field activities
  - Soil sampling and Tier I VI sampling at 2005/2007 6<sup>th</sup> St property
  - Soil sampling to north and west of undocumented UST basin (includes soil sampling to be performed in Naval Avenue right-of-way)
  - Continue property access coordination

#### December 2019

- Review and evaluation of November 2019 RI sampling data to determine if data gaps in these areas of the Site have been adequately addressed
- Finalize property access coordination

#### January 2020

- Soil and Tier I VI sampling to south of soil boring SB-13

#### February 2020

- Review and evaluation of January 2020 RI sampling data to determine if all Site data gaps have been addressed and RI field activities can be deemed complete

After reviewing your preliminary schedule, Site conditions and challenges, Ecology will use its discretion to provide you with a 180 day extension of the schedule to complete the RI Field Activities with the following requirements:

- All Environmental data generated thus far needs to be uploaded to Ecology's Environmental Information Management System (EIM).
- The draft RIWP Addendum will include a VI Workplan that includes Tier 1 and provisions for Tier II VI assessment at the above mentioned properties if deemed necessary.

- Develop a Work Plan for the removal of the leaking underground storage tanks, pump islands and associated piping in preparation for an Interim Action.
- The PLPs will also come to an agreement concerning the fate of the Site structure, which is currently abandoned and in disrepair.

The 180 day extension of the current due date for completion of RI field activities (August 30, 2019) would result in a new due date of February 2020.

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  
Department of Ecology  
Northwest Regional Office  
Toxics Cleanup Program

cc James P. Kiernan (CEMC)  
Robert Goodman (Rogers Joseph O'Donnell)  
Jim Reed (Victory Business Park LLC)  
Roger Jensen (Nordic Properties, Inc.)  
Peter Jewett (Farallon Consulting)  
Allyson Bazan (WA AAG)