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State of Washington  
Department of Ecology  
NW Regional Office  
3190 160<sup>th</sup> SE  
Bellevue, WA 98008-5452

October 17, 2019

Re: Newman's site Bremerton

Dear Mr. Myers:

This letter is in response to your letter dated September 30, 2019, to Mr. Shropshire, conveying your approval for a 180-day extension for the above referenced site. On page 4 in your conditions of approval you ask for a work plan for the removal of the "*leaking underground storage tanks*" and associated underground infrastructure. Chevron seized on this same reference in its email letter dated October 11, 2019.

At this time, we would like to inform you that we have made arrangements to meet with Steven Spencer of Environmental Services, Inc (253-921-7059) at the site as soon as next week. Our intent is to begin to develop a work plan for the removal of the underground infrastructure.

However, we would like to clarify to all parties that there is no evidence of "leaking tanks" on the property at this time. The known release was documented at the removal of the old tanks in 1991, when the current documented tanks were installed. They were actively used for approximately 17yrs, which is about two-thirds of their expected lifespan, but have been empty and dormant since 2008. The tanks have been dip tested twice by Washington State UST inspectors, and have been found with no trace of petroleum in them. We also updated the cathodic protection on the east and west end of the tanks to meet the State requirements. In short, there is no evidence that these tanks are "leaking."

The undocumented storage tanks on the west end of the site were opened over the summer, and two of the three were found to be full of sand. The third was full of water, with no oil sheen on the water. Very minute trace hydrocarbons were found present in the water in the micrograms/L range (parts per billion). Since no significant petroleum was present in any tanks, it is inaccurate to call these "leaking."

We understand that the tanks and conveyances will need to be removed but would like to keep the record accurate.

In your letter you also mention the "*abandoned building*". With all due respect, the building is not abandoned. We maintain it and the site regularly. It is dormant and we are waiting for this process to conclude. At that point the intention is to remodel and use the building as a productive structure.

Thank you for your time on this matter.

Jim Reed, Victory Business Park, LLC  
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