



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

December 27, 2019

Timothy Bishop
Chevron Environmental Management Company
6001 Bollinger Canyon Road
San Ramon, CA 94583

Re: Response to Remedial Investigation Work Plan Extension Request

Texaco 211577 Monterey
631 Queen Anne Avenue N, Seattle, WA 98109
Facility Site No. 77774779
Cleanup site ID 6663

Dear Timothy Bishop:

On December 2, 2019, the Washington State Department of Ecology (Ecology) received an Email from Arcadis U.S., Inc., (Arcadis), which included a *Remedial Investigation Work Plan Extension Request (RIWP Extension Request)*. The *RIWP Extension Request* was submitted on behalf of Chevron Environmental Management Company (CEMC), for the Texaco 211577 Monterey facility (Site). The Site is generally located at 631 Queen Anne Avenue North in Seattle (Property), and consists of the Property and multiple nearby properties and right-of-ways.

An Agreed Order (AO) No. 16537, effective August 21, 2019, requires CEMC and Roystone on Queen Anne, LLC (Roystone) to provide remedial action at the Site. Under the AO, CEMC is required to submit an Agency Review Draft Remedial Investigation Work Plan (RIWP) no later than 120 days after the AO effective date. CEMC is requesting an extension to complete the RIWP in the *RIWP Extension Request*.

As detailed below, Ecology approves a 60-day extension for submitting the RIWP. In light of the delay associated with both the Roystone interim action and submission of the RIWP, however, Ecology requests that CEMC submit a work plan for its proposed off-Property monitoring well/soil vapor probe survey and ground water sampling, followed by the survey/sampling.

Below is Ecology's detail response to the *RIWP Extension Request*:

1. The *RIWP Extension Request* indicates that CEMC is actively in the process of identifying and contacting the property owners of the associated lots and requesting access to the existing ground water monitoring wells and soil vapor probes.



Ecology appreciates CEMC's effort to obtain access to these properties. Ecology requests CEMC to provide a status update to Ecology, regarding the access to the properties that have existing monitoring wells and soil vapor probes, and may have future monitoring wells and soil vapor probes installed. The status update may be included in the work plan that is described in the next bullet.

2. On Page 2 of the *RIWP Extension Request*, CEMC proposes to conduct an inspection and condition survey of the off-Property ground water monitoring wells and soil vapor probes, and conduct a gauging and sampling event for all identified and functional off-Property ground water monitoring wells. Ecology agrees that a ground water sampling event can provide useful data to support the RIWP preparation.

Since there is a significant project delay, Ecology requests that CEMC prepare a work plan for the off-Property monitoring well/soil vapor probe survey and ground water sampling by 30 days following the receipt of this letter. The work plan shall include a Sampling and Analysis Plan (SAP) and Quality Assurance Project Plan (QAPP) in compliance with WAC 173-340-820, and a Health and Safety Plan (HASP).

The SAP will describe the survey and sampling objectives, identify the number and location of all monitoring wells and soil vapor probes to be surveyed and sampled, and provide a detailed description of sampling tasks. The SAP shall describe specifications for sample identifiers; sampling equipment; the analyses to be performed; descriptions of sampling equipment and methods to be used; sample documentation; sample containers, collection and handling; data and records management; and schedule.

The Quality Assurance Project Plan (QAPP) shall be prepared in accordance with the Guidance for Preparation of Quality Assurance Project Plans, EPA Region 10, Quality Data Management Program, QA/R-5 and requirements of the EPA Contract Laboratory Program. The QAPP will also follow Ecology's Guidelines for Preparing Quality Assurance Project Plans for Environmental Studies (July 2004)¹. Laboratories must meet the accreditation standards established in WAC 173-50. Data quality objectives will reflect the criteria or threshold values used for the source control evaluation.

The work plan, including the SAP/QAPP/HASP, shall be submitted to Ecology for review and approval, no later than 30 days after receipt of this letter. Work should begin after written approval from Ecology.

3. On Page 2 of the *RIWP Extension Request*, CEMC proposes to collect split-samples during the Property Interim Action along the excavation sidewall. **Ecology does not agree with CEMC to collect split-samples on the excavation sidewalls.**

¹ Found at <https://fortress.wa.gov/ecy/publications/documents/0403030.pdf>

Under the AO, Roystone is required to conduct the Interim Action on the Property in conjunction with the planned Property redevelopment. Roystone submitted a Draft Interim Action Work Plan on May 17, 2019. After a 30-day public review period, and Ecology's review and approval, the final Interim Action Work Plan (IAWP) was completed on August 20, 2019.

The IAWP provides a detailed procedure for collecting confirmation soil samples on the excavation limits, including the excavation sidewalls. If there is a concern about the confirmation soil sampling, Ecology may collect split-samples, if necessary. Ecology does not recognize the necessity for CEMC to collect split-samples along the excavation sidewalls.

4. On Page 2 of the *RIWP Extension Request*, CEMC proposes to "submit the RI WP within 90 days after reception of validated data for the groundwater samples and Property excavation sidewall samples."

Based on the above bullets, Ecology approves the following RIWP extension:

The RIWP shall be submitted no later than 60 days after CEMC's receipt of validated data for off-Property ground water sampling.

If you have any questions about this letter, please contact me at (425) 649-7109 or jing.song@ecy.wa.gov.

Sincerely,



Jing Song
Site Manager
Toxics Cleanup Program, NWRO

cc: Christopher Dotson, Arcadis
Cheryl Cameron, CEMC
Robert Goodman, Rogers Joseph O'Donnell
Pui Leung, Roystone
Jerry Sawetz, The Riley Group, Inc.
Louise Bardy, Ecology