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August 18, 2020

Timothy L. Bishop
Chevron Environmental Management Company
6001 Bollinger Canyon Road
San Ramon, CA 94583
timbishop@chevron.com

Re: Comments on the *Revised Agency Review Draft Feasibility Study Report*, dated April 28, 2017, prepared by Leidos, Inc.

- **Site Name:** Cowlitz Food & Fuel (also known as Former Texaco Service Station No. 211556)
- **Site Address:** 101 Mulford Road, Toledo, Lewis County
- **Agreed Order:** DE 5236
- **Facility/Site No.:** 1166
- **Cleanup Site ID No.** 7025

Dear Timothy L. Bishop:

Thank you for submitting the above-referenced Feasibility Study (FS) Report for our review. Please revise the report to incorporate the following comments and then resubmit for our review within 30 days of the date of this letter:

1. Section 3.2: Add the indoor air pathway to the discussion of potential exposure pathways and receptors.
2. Section 3.6, page 11, text table: Please change the proposed cleanup standard for lead from 250 milligrams per kilogram (mg/kg) to 220 mg/kg to match the concentration shown in MTCA Table 749-2.
3. Section 4.2, Groundwater: Please update the summary of groundwater results to include data collected since the report was prepared in 2017.
4. Section 5.2, Description of Cleanup Action Alternatives, Alternatives 4 and 5: When the FS Report was prepared, the current owner did not anticipate making any significant change in use of the active station property (such as upgrades to the existing service station or redevelopment of the property). Therefore, Alternative 4, Monitored Natural Attenuation (MNA), Institutional Controls, and

Future Property-Wide Excavation in Conjunction with Service Station Upgrades or Redevelopment was intended to occur in an unspecified timeframe, but likely within the next twenty years. However, this uncertainty in schedule and length of restoration time frame is unacceptable to Ecology.

Alternative 5, Property-Wide Excavation, MNA, and Institutional Controls, had an acceptable schedule and timeframe because it would be performed as soon as practicable, instead of performing the excavation in conjunction with redevelopment, or upgrades to the service station infrastructure. However, this alternative would require long-term closure (estimated 6 months) of the active service station and would likely result in significant disruption of business operations at the adjacent Mrs. Beesley's restaurant.

However, earlier this year, the active service station business and property was sold to new ownership who plan to make significant upgrades to the active service station. These upgrades will also include regulatory required upgrades.¹ Therefore, please combine Alternatives 4 and 5 into a single alternative that would perform the cleanup work during service station upgrades in the near future to occur in conjunction with the required service station upgrades, but not to exceed three years from the Final RI/FS Report. Failure to start the cleanup work within this timeframe may result in enforcement actions.

On November 12, 2019, a conference call was held with representatives from Arcadis (Chevron's consultant, Chris Dotson and Komal Dixit), Ecology, and the new operator (now also owner) of the service station (Shamsher Singh, Gurpreet [Garry] Singh, and Jag Singh). The call discussion included the following:

- a. Arcadis needs to contact Chevron legal for a letter they can give the owner to show they are committed to working with the owner/operator so that the planned upgrades can be combined with the cleanup.
- b. However, before the above letter can be prepared, Chevron and Arcadis need to know exactly what the owner/operators upgrade plans consist of. Chevron/Arcadis and the owner/operator need to communicate with each other about this. Ecology has requested an update regarding the status of these communications.² However, no response has yet been received. Please provide Ecology with an update within 30 days of the date of this letter.
- c. Chevron and the owner/operator need to have a clear understanding and agreement of how and which tasks are cleanup related (and will be paid by Chevron) and which tasks pertain to station upgrades (and will be the responsibility of the owner/operator).
- d. Arcadis mentioned that it might be possible for "Incremental Cost Agreement" to be established between Chevron and the owner/operator. Ecology is not sure that this would be appropriate for this situation.

¹ Underground Storage Tank (UST) rule, Washington Administrative Code (WAC) 173-360A. The new UST rule took effect 10/1/2018, but some requirements are phased in for existing tanks. However, if new tanks or piping are installed on or after 10/1/2018, all sections of the rule immediately apply. The first deadline for the existing tank system is that tests of leak detection, spill buckets, overfill prevention, and sumps testing requirements must begin by October 1, 2021.

² Re: Request for Information – Cowlitz Food and Fuel Site. Email from Steve Teel, Ecology, to Tim Bishop, Chevron; Komal Dixit, Arcadis; Chris Dotson, Arcadis; hmahal@msn.com and exit59north@gmail.com; dated May 20, 2020.

Because the cleanup would be implemented through an Agreed Order with Chevron, Chevron would need to be the lead for all work that was conducted under the Cleanup Action Plan.

The revised alternative in the FS needs to include:

- A general description of what the station upgrades are and how these will be performed and implemented during the remedial action (including how the work will be sequenced).
 - A general description of how the agreement between Chevron and the owner/operator will be reached and documented.
5. Appendix C, Alternative 3 cost estimate: Please also add the reporting task cost of \$12,480 to the cost estimate so that it is consistent with the other alternatives that include excavation (Alternatives 2, 4, and 5).
 6. Environmental data has not been submitted into Ecology's Environmental Information Management (EIM) database since 2015. All EIM data shall be uploaded and accepted concurrent with the submittal of the Draft Final RI/FS Report.

If you have any questions about this letter, please contact me at (360) 407-6247 or steve.teel@ecy.wa.gov.

Sincerely,



Steve Teel, LHG
Cleanup Project Manager/Hydrogeologist
Toxics Cleanup Program
Southwest Regional Office

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