



July 14, 2020

Dale Myers  
Washington State Department of Ecology  
Northwest Regional Office  
3190 160th Avenue SE  
Bellevue, WA 98008-5452

**Re: Progress Report No. 7 – July 2020**

Texaco Strickland Cleanup Site  
6808 196th Street SW, Lynnwood, Washington  
Agreed Order No. 14315  
Ecology PM – Dale Myers  
Project No. 180357

Dear Dale:

Aspect Consulting, LLC (Aspect) is pleased to provide Progress Report No. 7 on behalf of potentially liable persons (PLPs) Strickland Real Estate Holdings (SREH) and Chevron Environmental Management Company (CEMC), who are signatories to Washington State Department of Ecology (Ecology) Agreed Order (AO) #14315, effective September 10, 2018. The AO requires that the PLPs submit quarterly progress reports to Ecology until satisfaction of the Agreed Order.

This Progress Report No. 7 is for the second quarter 2020 reporting period.

### **Progress Made During the Reporting Period**

An agency review draft RIWP Addendum was submitted to Ecology for review on March 25, 2020 (during the previous reporting period). Ecology provided comments on April 6, 2020, that were discussed in a technical meeting of Aspect, Ecology, CEMC, and Arcadis on April 23, 2020. A revised draft RIWP Addendum was submitted to Ecology on May 19, 2020; Ecology provided comments on May 26, 2020, and requested submittal of the Final RIWP Addendum, which was submitted on May 28, 2020. Ecology responded with their approval on June 1, 2020. Records of this progress are attached.

### **Sampling and/or Testing Reports Received**

No sampling and/or testing reports were received during the second quarter of 2020.

### **Summary of Deviations**

No deviations from the AO or AO deliverables occurred during the second quarter of 2020.

### **Contacts with Other Entities or Public**

During the second quarter of 2020, Aspect, CEMC, and Arcadis attended a technical meeting with Equilon Enterprises, LLC (Shell) and their consultant GHD Group on April 30, 2020. The purpose



of this meeting was to discuss the potential comingling of both the Jiffy Lube release at the Texaco Strickland Site as well as the potential comingling from an upgradient release at the 68<sup>th</sup> Center Site. During this meeting, the parties agreed to share preliminary investigation results from the respective Sites. The Texaco Strickland Site will rely on Shell/GHD's characterization of soil and groundwater quality in 196<sup>th</sup> Street SW right of way (ROW) to respond to Ecology's comments on upgradient delineation at the Texaco Strickland Site, and as outlined in the Final RIWP Addendum.

Access agreements for the two neighboring properties necessary to perform the investigation work outlined in Final RIWP Addendum were executed. The access agreement with Nelson Investments, LLC, which owns the property to the west, was executed on June 25, 2020. The access agreement with Anne Marie Kriedler, who owns the property to the south, was executed on June 30, 2020.

No additional contacts with other entities or public occurred during the second quarter of 2020.

## **Potential Problems and Suggested Solutions**

No potential problems are anticipated for third quarter 2020 activities.

## **Changes in Key Personnel**

No changes in key personnel occurred during the second quarter of 2020.

## **Activities Planned for the Next Reporting Period**

- Begin RIWP Addendum implementation, including:
  - Advancing soil borings
  - Constructing and developing monitoring wells
  - Conducting the first round of groundwater sampling
  - Performing soil gas sampling
- Resume bi-monthly AO progress reporting to Ecology during implementation.
- Evaluate an interim action to treat or remove the light non-aqueous phase liquid (LNAPL) at the Site. After the PLPs complete this evaluation, a schedule to submit an Interim Action Work Plan will be provided to Ecology, as requested in the June 1, 2020 email (Attachment 2).

The next quarterly progress report will be submitted on or before October 15, 2020.

If you have any questions concerning this progress report, please contact me at 206-780-7746.

Sincerely,

**Aspect consulting, LLC**



**Adam Griffin, PE**  
Associate Engineer  
agriffin@aspectconsulting.com



**Andrew Yonkofski, LHG**  
Project Hydrogeologist  
ayonkofski@aspectconsulting.com

**Attachments:**

- Attachment 1 – Revised Agency Review Draft RIWP Addendum Transmittal Email to Ecology
- Attachment 2 – Final RIWP Addendum Transmittal Email to Ecology and Ecology Approval

cc: Ryan Megenity – Rainier Property Management Co. LLC  
Doug Steding – Northwest Resource Law PLLC  
Dan Whitaker – Dan Whitaker Consulting  
Tom Strickland – Strickland Real Estate Holdings  
James Kiernan – CEMC  
Jon-Erik Magnus – Rogers Joseph O'Donnell PLLC  
Robert Goodman – Rogers Joseph O'Donnell PLLC  
Eric Epple – Arcadis  
Christopher Dotson – Arcadis

# **ATTACHMENT 1**

**Revised Agency Review Draft RIWP  
Addendum Transmittal Email to Ecology**

## Andrew Yonkofski

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**From:** Myers, Dale - TCP (ECY) <DAMY461@ECY.WA.GOV>  
**Sent:** Wednesday, May 20, 2020 5:51 AM  
**To:** Andrew Yonkofski; Adam Griffin  
**Cc:** Myers, Dale - TCP (ECY)  
**Subject:** RE: Texaco Strickland Site - RIWP Addendum - Revised Agency Review Draft

Thank you Adam and Andrew  
Ecology will review and get back to you as soon as possible  
Dale

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**From:** Andrew Yonkofski [mailto:ayonkofski@aspectconsulting.com]  
**Sent:** Tuesday, May 19, 2020 5:56 PM  
**To:** Myers, Dale - TCP (ECY) <DAMY461@ECY.WA.GOV>  
**Cc:** TySchreiner@KennedyJenks.com; Julia Schwarz <JuliaSchwarz@kennedyjenks.com>; Ryan Megenity <ryan@rpmcousa.com>; Douglas Steding <dsteding@nwresourcelaw.com>; Dan Whitaker Consulting <dan@danwhitakerconsulting.com>; Kiernan, James <JKiernan@chevron.com>; Jon-Erik Magnus <JMagnus@rjo.com>; Robert C. Goodman <RGoodman@rjo.com>; Dotson, Christopher <christopher.dotson@arcadis.com>; Epple, Eric <eric.epple@arcadis.com>; Adam Griffin <agriffin@aspectconsulting.com>  
**Subject:** Texaco Strickland Site - RIWP Addendum - Revised Agency Review Draft

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Good afternoon, Dale,

We have revised the Remedial Investigation Work Plan Addendum based on the comments you provided on April 6<sup>th</sup> and in our subsequent technical meeting on April 23<sup>rd</sup>. If you approve of this RIWP Addendum, we will finalize it and begin implementation.

The Revised Agency Review Draft RIWP Addendum can be downloaded here:

<https://spaces.hightail.com/space/cVnphwK7Fb>

Please let us know if you have any questions. Thank you,

**Andrew Yonkofski, LHG** | Project Hydrogeologist | Direct: 206.413.5411 | Cell: 404.272.3488  
**Aspect Consulting LLC** | 710 2nd Ave, Suite 550, Seattle, WA 98104 | [www.aspectconsulting.com](http://www.aspectconsulting.com)

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## **ATTACHMENT 2**

**Final RIWP Addendum Transmittal Email  
to Ecology and Ecology Approval**

## Andrew Yonkofski

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**From:** Myers, Dale - TCP (ECY) <DAMY461@ECY.WA.GOV>  
**Sent:** Monday, June 1, 2020 7:38 AM  
**To:** Andrew Yonkofski  
**Cc:** Ryan Megenity; Douglas Steding; Dan Whitaker Consulting; Kiernan, James; Jon-Erik Magnus; Robert C. Goodman; Dotson, Christopher; Epple, Eric; Adam Griffin; Julia Schwarz; Bazan, Allyson (ATG); Bardy, Louise (ECY)  
**Subject:** RE: Texaco Strickland Site - Final RIWP Addendum and AO Schedule Extension Request

Thank you Adam, Andrew, and James

Your Texaco Strickland Site - RIWP Addendum Final, dated May 28, 2020 is approved

- Please proceed with the remedial investigations as described in the RIWP Addendum

Ecology understand that the PLPs are evaluating an interim action to meet the requirements of the Model Toxics Control Act (MTCA) and as required by the AO.

- A Public Comment Period for an Interim Action Work Plan (IAWP) is required.
  - Ecology will need to prepare an IAWP Fact Sheet and schedule the Public Comment Period.
- Please provide as soon as possible an approximate schedule for delivery of an Agency Review draft IAWP for Ecology's review.
- Once you have provided this information, Ecology will respond in writing to your Extension request within 45-days.

Respectfully

Dale Myers

Department of Ecology

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**From:** Andrew Yonkofski [mailto:ayonkofski@aspectconsulting.com]

**Sent:** Thursday, May 28, 2020 5:28 PM

**To:** Myers, Dale - TCP (ECY) <DAMY461@ECY.WA.GOV>

**Cc:** Ryan Megenity <ryan@rpmcousa.com>; Douglas Steding <dsteding@nwresourcelaw.com>; Dan Whitaker Consulting <dan@danwhitakerconsulting.com>; Kiernan, James <jkiernan@chevron.com>; Jon-Erik Magnus <JMagnus@rjo.com>; Robert C. Goodman <RGoodman@rjo.com>; Dotson, Christopher <christopher.dotson@arcadis.com>; Epple, Eric <Eric.Epple@arcadis.com>; Adam Griffin <agriffin@aspectconsulting.com>; Julia Schwarz <JuliaSchwarz@kennedyjenks.com>

**Subject:** Texaco Strickland Site - Final RIWP Addendum and AO Schedule Extension Request

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Good afternoon, Dale,

This email transmits the two subject documents for your approval. The Final RIWP Addendum addresses the final Ecology comments received on May 26, 2020. Due to the file size, it can be downloaded from the link below. Please let us know if you approve both documents, and we will begin implementation of the RIWP Addendum according to the proposed schedule extension.

<https://spaces.hightail.com/receive/O2KA78LMLw>

Thank you,

**Andrew Yonkofski, LHG** | Project Hydrogeologist | Direct: 206.413.5411 | Cell: 404.272.3488  
**Aspect Consulting LLC** | 710 2nd Ave, Suite 550, Seattle, WA 98104 | [www.aspectconsulting.com](http://www.aspectconsulting.com)

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