



November 24, 2020

Reference No. 11214257

Sonia Fernandez
Washington State Department of Ecology
Northwest Regional Office
3190 160th Avenue Southeast
Bellevue, Washington 98008

Dear Ms. Fernandez:

**Re: Cleanup Action Path Forward
Jacksons Food Store No. 615
22802 Bothell-Everett Highway, Bothell, Washington
VCP No. NW2058**

GHD Services, Inc. (GHD) is pleased to submit this letter to the Washington State Department of Ecology (Ecology) on behalf of PacWest Energy, LLC (PacWest), a joint venture between Shell Oil Products US (Shell) and Jacksons Food Stores (JFS). This letter was prepared to provide a status of the site closure activities at the retail service station located at 22802 Bothell-Everett Highway, Bothell, Washington (the "Site"). The following is in response to the Voluntary Cleanup Program (VCP) Status Request letter, issued by Ecology on October 28, 2020.

Cleanup Status

The Site was entered into Ecology's VCP in 2008 and is currently enrolled under VCP Project No. NW2058. Several subsurface investigations have been completed at the Site beginning in 1991, including interim cleanup actions of soil excavation activities, groundwater removal, treatment, and disposal, and the operation of a soil vapor excavation system for 8 years. GHD indicated in the 2019 *Cleanup Action Path Forward* letter submitted to Ecology, that based on the soil and groundwater data collected at the Site, it was GHD's opinion that sufficient characterization had been completed and additional cleanup action at the Site was likely minimal. However, in late 2019, JFS indicated they were going to complete a raze and rebuild of the Site.

To date, the raze and rebuild of the Site is almost complete. Prior to and during redevelopment activities, GHD and JFS subcontractors completed the following interim actions:

- Oversight of the proper decommissioning of four groundwater monitoring wells to prepare for earthwork activities.
- Excavation and off-Site disposal of approximately 2,500 cubic yards of soil with minor petroleum impacts.
- De-watering activities generated approximately 126,000 gallons of water, which was disposed of off-Site.
- Oversight of the proper decommissioning of a 1,000-gallon abandoned heating oil underground storage tank (UST) and collection of compliance soil samples.



- Oversight of the proper decommissioning of the former fuel dispenser islands and product piping, and collection of compliance soil samples.
- Application of approximately 1,600 pounds of PetroFix and 275 pounds of Oxygen Release Compound (ORC) to areas of residual petroleum impacted soil and groundwater.

Reporting and Schedule for Completing Cleanup

Based on the above interim actions and our understanding of the Site's environmental and compliance history, one groundwater monitoring well is required to be reinstalled in the vicinity of the highest historical petroleum impacts and a second groundwater monitoring well is required to be installed within the northeastern corner of the Site, to act as a down-gradient point of compliance.

Identified required activities, along with a timeline for completion, are listed below. It should be noted that activities will be completed by the end of the quarter and year identified.


- First quarter 2021 (1Q21) – Complete installation of additional on-Site monitoring wells.
- 2Q21 and 3Q21 – Complete additional compliance monitoring.
- 4Q21 – Submit for opinion to Ecology a Cleanup Action Report, which will include a summary of the field activities and results of the above mentioned Site redevelopment and assessment activities.

It should be noted that GHD is currently preparing a UST Decommissioning report, that will be submitted to Ecology as required, that summarized the completed decommissioning activities that were recently completed at the Site. Based on the interim actions completed to date, cleanup of petroleum-impacted soil and groundwater has been completed to the extent practicable.

PacWest is committed to staying in the VCP at this time and will complete these activities within the identified timeline. Please contact Brian Peters at (425) 536-6506 if you have any questions or require additional information.

Sincerely,

GHD


Emily Blakeway
Project Manager


Brian Peters, LG
Technical Director

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cc: Richard Wright, PacWest
John Robbins, Shell