



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

March 9, 2010

*Chelan
Chevron*

Chevron Environmental Management Company
c/o Ms. Olivia Skance
Project Manager/MBU Team Leader
6111 Bollinger Canyon Road, Room 3636
San Ramon, CA 94583-5186

Re: Ecology's Comments on the December 2009, Draft Cleanup Action Plan, by SAIC.

Former Chevron Service Station No. 9-6590, FS/ID#77751227

Dear Ms. Skance:

Thank you for submitting the Draft Cleanup Action Plan (CAP), referenced above. This letter provides Chevron Environmental Management Company (Chevron EMC) with comments on the Draft CAP. Formal approval is required by the Washington State Department of Ecology (Ecology). Please submit a revised report that addresses Ecology's comments for Ecology's review and approval.

Ecology Comments on the Draft CAP:

1. Introduction and Section 5.2.1. How will "monitored" natural attenuation of soils be monitored or confirmed?
2. Section 4.3.2. Points of Compliance for Groundwater (3rd paragraph). Strike the last sentence that refers to conditional points of compliance.
3. Section 4.3.3. Points of Compliance for Soil (4th paragraph). This paragraph should be modified beginning at the following sentence: "At this site, cleanup levels for protection of perched aquifer groundwater will consist of a demonstration that **both soil and** groundwater cleanup levels have been achieved." Strike the rest of this paragraph and add the following. "NAPL recovery and groundwater monitoring will occur as a means to evaluate whether performance criteria and cleanup levels are being met. Once groundwater monitoring indicates that groundwater cleanup levels have been met, soil confirmation sampling will be performed." Standard (not conditional) points of compliance are required for this site. Any reference to a conditional point of compliance throughout this document should be revised.



Chevron Environmental Management Company
c/o Ms. Olivia Skance
March 9, 2010
Page 2 of 3

4. Section 5.2.2, last paragraph. Please add that non-aqueous phase liquid (NAPL) monitoring and recovery will occur at a minimum frequency once per quarter.
5. Section 5.2. A soil vapor monitoring component should be added to the selected cleanup action. Volatile components of gasoline and diesel have been identified as contaminants of concern for soil vapor and other media at the Site. Soil vapor concentrations can vary over time. For example, fluctuations in the groundwater table elevation over time can result in changes in soil vapor concentrations. Soil vapor sampling from the existing vapor well network should be performed annually to evaluate the ongoing risk of vapor intrusion from impacted soil or the NAPL and dissolved contaminant plumes.
6. During soil vapor monitoring events, monitoring of vapors using a meter capable of measuring lower explosive limit (LEL) should be performed during a minimum of three events to correlate vapor concentrations with LEL readings and ensure safety.
7. Section 5.2.6. Institutional Controls. The following should be incorporated into the discussion of institutional controls. If, following the additional soil sampling (outlined in Section 4.3.3 and Figure 2) contamination remains at concentrations exceeding cleanup levels in the top 15 feet of soil on the property, then Ecology will require a restrictive covenant for the property. The need for a Soil Management Plan will be determined based on environmental findings or any future proposed development activities. At a minimum, a Soil Management Plan will include an evaluation of exposure pathways; a description of the location(s) of impacted media; worker safety protocols; best management practices; sampling, monitoring, and analysis plans; and procedures for disposal of excavated soils. In addition, include a brief description of steps taken by Chevron EMC and the City of Chelan to ensure that adequate notification and information will be provided to parties who propose development in the area of the site in the future.
8. Section 8. Schedule. The schedule will need to be updated now that the field work will be postponed until Fall 2010. Delete the estimates for time to final completion of bailing phase and natural attenuation of groundwater. This is the schedule for implementation of the cleanup plan, not a performance schedule. Ecology doesn't typically include these estimates in this schedule. Estimates on ranges for restoration timeframes are discussed elsewhere in the document in greater detail.

Ecology's next step will be to provide Chevron EMC with a draft copy of a Consent Decree for the purpose of completing remedial actions described in the CAP. Ecology

Chevron Environmental Management Company
c/o Ms. Olivia Skance
March 9, 2010
Page 3 of 3

expects that negotiations on edits to the Draft Consent Decree be finalized within 30 days of Chevron EMC receiving it. Once the Consent Decree is finalized, it will be released for public comment. The finalized CAP will be included as an exhibit attached to the Consent Decree. Once the Consent Decree is finalized and filed in court, the CAP can be implemented.

Please do not hesitate to contact me with questions or if you require technical assistance. I would be more than happy to discuss point by point how to address the comments provided to expedite response and actions taken. I can be reached at (509) 454-7833 or laura.klasner@ecy.wa.gov.

Sincerely,



Laura Klasner, P.E.
Site Manager
Toxic Cleanup Program
Central Regional Office

cc: Brianne Plath, Ecology, TCP-CRO
Mr. Peter Catterall, Senior Project Manager, SAIC