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**Chevron Environmental
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RECEIVED

October 31, 2012

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Mr. Russ Olsen
Voluntary Cleanup Program Unit Supervisor
State of Washington Department of Ecology – Northwest Regional Office
3190 160th Ave SE
Bellevue, WA 98008-5452

**Re: Response to Notice of Potential Liability
Boeing Field Chevron, Facility No. 9-3099
10805 East Marginal Way South, Tukwila WA
Ecology Site No.: 2551**

Dear Mr. Olsen,

Chevron Environmental Management Company (Chevron) is in receipt of the September 27, 2012 Notice of Potential Liability letter for the facility identified as “Boeing Field Chevron” located at 10805 East Marginal Way South in Tukwila, Washington. Following a detailed review of the letter and available archived files, Chevron offers the following comments.

We found that we do not have complete files fully necessary to respond to the potentially liability person (PLP) notification. Accordingly, on October 30, 2012 we submitted a request for Ecology’s files referenced in your letter. We request the opportunity to supplement this response within 30 days of receipt of those files.

As acknowledged in the letter from Ecology, Chevron conducted a voluntary remedial action at the site that included the removal of 11 underground storage tanks (USTs) and approximately 2,500 cubic yards of petroleum-impacted soil. Upon completion of that work, Chevron continued to monitor groundwater conditions at the site through November, 2003, after free-phase product was discovered in monitoring well MW-11 by Chevron’s consultants and immediately reported to Ecology in May, 2003. Ecology recognized at that time that this was a new release and not associated with Chevron’s operations. Chevron reported the change of conditions to Ecology.

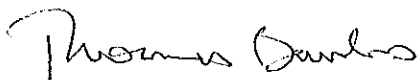
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Prior to discovery of the free-phase product in 2003, there were no remaining impacted soils or groundwater exceeding Model Toxic Control Act (MTCA) Method A cleanup levels with the exception of low benzene concentrations in monitoring well MW-10. No further remediation work was expected and we were in a monitoring phase only. Groundwater concentrations in MW-10 were below MTCA Method A cleanup levels for nine sampling events from 1997 through November 1999 when an increasing benzene trend was identified which is an indicator of the new release reported in 2003. Absent the new release, the site should have been eligible for a No Further Action determination.

Based on the above information and subject to our request for the opportunity to supplement this response upon receipt of Ecology's files, Chevron respectfully challenges the PLP status as Chevron had substantially completed remediation work as necessary for past operations and the current release is not associated with Chevron activities.

Chevron appreciates the opportunity to comment on the September 27, 2012 PLP letter. Should you have any questions or comments regarding Chevron's response, please do not hesitate to contact me at (925) 790-6231.

Sincerely,



Thomas Bauhs
Team Lead
Marketing Business Unit

Cc: Todd Littleworth – Chevron Corporation
Eric Hetrick – Chevron Environmental Management Company