

September 3, 2002

Sean Sheldrake
Environmental Scientist
Office of Environmental Cleanup
EPA Region 10
1200 Sixth Ave. (ECL-111)
Seattle, Washington 98101

**RE: Monthly Progress Report for August 2002
PM NW Site, La Conner, Washington**

Dear Sean:

This monthly report is submitted on behalf of ChevronTexaco and Shell Oil Company per the Administrative Order on Consent (Docket No. CERCLA-10-2000-0186) for the PM NW Site for the month of August 2002 and provides:

- A description of all significant developments during the reporting period, including actions performed and any problems encountered, analytical data received during the reporting period, and
- Developments anticipated during the next reporting period including a schedule of actions to be performed, anticipated problems, and planned resolutions of past or anticipated problems.

Significant Developments

- Excavation of the pit bottoms and sidewalls continued into August. Pit bottom and sidewall samples were collected on the following days; July 24, 2002, August 1, 2002, August 12, 2002, August 15, 2002, and August 21, 2002. Review of these results indicated the need for continued excavation in some areas. A summary of this data is provided in Table 1. Laboratory reports are attached, and the data have been submitted for validation.
- Final analytical results for pit bottom confirmation samples were collected during the week of August 26, 2002. A summary of the final pit bottom sample data as well as the statistical analysis of this data is provided in Table 2. Verbal results for TPH were received from the laboratory and compiled for EPA (see 3rd bullet below) and the data analyzed per the Statistical Guidance for Ecology Site Managers (August 1992) to define hot spots and demonstrate compliance with the 1,400 ppm TPH removal criterion. Sample locations are shown on Figure 1. The results of the statistical analysis (see Table 1) indicate that the pit is below cleanup criteria and is ready to be backfilled. Laboratory reports have not yet been received but will be provided with the September progress report.

- Final sidewall confirmation samples were also collected during the week of August 26, 2002. A summary of the final sidewall data is provided in Table 3 with sample locations shown on Figure 2. The analytical data indicate that all sidewall samples are below the cleanup criteria of 1,400 ppm. Laboratory reports have not yet been received but will be provided with the September progress report.
- As described in the TCR Work Plan & Sampling and Analysis Plan (SAP) 25% of the samples collected for confirmation purposes were analyzed for: Aromatic and Halogenated VOCs by EPA Method 8260; Polynuclear aromatic hydrocarbons (PAHs) by EPA Method 8270; RCRA Metals by EPA Method 6010/7000 series; and Total organic carbon by EPA Method 9060. One sample per pit was also analyzed for: Extractable and volatile organic hydrocarbons by the Washington State EPH/VPH methods; Polychlorinated Biphenyls (PCBs) by EPA Method 8082; and Dioxins by EPA Method 8280. This was described in the SAP under Non-Time Critical Removal Residual Soil Sampling. This 25% corresponded to the confirmation samples with the highest detected TPH concentrations. Samples included in this 25% collected since the last progress report are summarized in Tables 4 and 5. A full summary of this data will be included in the TCR Completion Report. Laboratory reports are attached, and the data have been submitted for validation.
- An approval process for backfilling the pits was discussed with and approved by EPA last month. A summary of analytical results for the pit bottom along with the statistical analysis confirming the soil samples meet cleanup levels was e-mailed to EPA, SITC, and Ridolfi on August 28, 2002, along with a request for written approval from EPA to backfill. Visual confirmation of the pit bottoms was made by SITC the week of August 19, 2002.
- Results from the earthworm bioassay testing were provided with the July 2002 monthly progress report. Based on the results of this testing, we have requested and are currently awaiting approval from EPA of the 1,400 ppm cleanup criteria.

Planned Activities

- Excavation activities are complete pending approval of the 1,400 ppm cleanup criteria. Backfill is expected to proceed as soon as written approval to backfill is received. Backfill activities are expected to take 2 to 3 weeks.
- Site cleanup activities (e.g., final grading, fence removal) will commence following completion of backfill activities. At the request of SITC, the silt fence will remain in place at the completion of site activities and SITC will assume responsibility for removal of the silt fence.
- We are currently working on an exposure assessment and site conceptual model based on information obtained during monitoring well installation. This information along with groundwater sampling results and well construction details will be submitted as the NTCR Site Investigation Report in the fall.

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If you have any questions regarding the information discussed herein, please call me at (206) 624-9349.

Sincerely,

The RETEC Group, Inc.

Allison J. Crowley, P.E.
Project Engineer

Attachment

cc: Frank Fossati, Tom Kearns – Shell Oil Company
Jerry Sedgwick, Charlie Lambert – ChevronTexaco Inc.
John Huntley – PM NW Inc.
Jeff Hegedus – Swinomish Indian Tribal Council
Bruce Duncan, Rene Fuentes – EPA
Colin Wagoner – Ridolfi Engineers
Halah Voges, Anne Fitzpatrick, RETEC
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