

October 1, 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 September 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 September 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 were completed the week of August 21, 2002. EPA approval of the earthworm bioassay data indicating that the 1400 ppm TPH level is protective and that this level has been reasonably achieved in the PMNW pit excavations was received on September 2, 2002.
- Backfilling and regrading of the site began the week of September 9, 2002 and were completed the week of September 23, 2002. Approximately 16,000 cubic yards of backfill was brought into the site for use as backfill.
- The security fence was removed the week of September 23, 2002. At SITC's request, the gate and lock will not be removed in order to prevent easy public access to the site. Also at the request

of SITC, the silt fence will remain in place and SITC will assume responsibility for removal of the silt fence.

- Laboratory analytical results for final pit bottom confirmation samples (collected the week of August 26) and for final sidewall confirmation samples had not been received in time for the August monthly progress report and are attached here. Results of these samples were discussed in the August progress report.
- Laboratory analytical reports for NTCR confirmation samples received since the last progress report are also attached.
- Analytical for groundwater samples collected from NTCR monitoring wells (MWs) has been received. Metals concentrations are summarized in Table 1. As in the first round of groundwater sampling (June 2002) there were no detections of TPH, SVOCs or VOCs above the method detection limits. A copy of the laboratory analytical report is attached to this report. Data have been submitted for validation and validation reports will be provided with the NTCR Site Investigation Report. The next groundwater sampling event is scheduled for March 2003.

Planned Activities

- Due to the lack of availability of grinding equipment, SITC, Shell, and ChevronTexaco are investigating the possibility of burning the slash and hydroseeding the regraded site instead of chipping and grinding. SITC is amenable to this modification and feels that hydroseeding the site will result in greater erosion control. This activity would likely occur in late October depending on weather and permit requirements.
- We are awaiting EPA approval to abandon two shallow monitoring wells that were installed by EPA as part of a shallow groundwater monitoring network. The depth of the wells in this network was less than 10 feet below ground surface. The remaining wells in this network were located around the perimeter of the excavation and were abandoned during TCR activities.
- 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.
- Work on the TCR completion report will commence following final site closure.

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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, Shawn Hinz – RETEC
File TX002-14919-130 in “Monthly Progress Reports” folder – RETEC Central Files