



January 10, 2022

Dale Myers
Washington State Department of Ecology
15700 Dayton Ave North
Shoreline, Washington 98133

Re: Progress Report, SKS Shell Station Site, Fourth Quarter 2021

LMI – West Seattle Holdings, LLC PPCD No. 13-2-27556-2
Facility ID #39196282, Cleanup ID #6015
Aspect Project No. 160328

Dear Mr. Myers:

This progress report was prepared by Aspect Consulting, LLC (Aspect) on behalf of LMI – West Seattle Holdings, LLC (LMI) for the SKS Shell Station Site (Site), located at 3901 Southwest Alaska Street in Seattle, Washington, where post-cleanup compliance sampling and reporting is being completed after remedial excavation and redevelopment of the Site was completed in 2015. Cleanup and redevelopment of the Site has been completed in accordance with Washington Administrative Code (WAC) Chapter 173-340.

This progress report was prepared as a condition to Prospective Purchaser Consent Decree (PPCD) #13-2-27556-2 signed between LMI and the Washington State Department of Ecology (Ecology) for the Site, filed July 29, 2013, and amended April 16, 2015. Per the PPCD, “LMI shall submit to Ecology quarterly written Progress Reports that describe the actions taken during the previous month(s) to implement the requirements of this Decree.” The Progress Reports shall include the following:

- A. A list of on-Site activities that have taken place since the last reporting period
- B. A detailed description of any deviations from required tasks not otherwise documented in project plans or amendment requests
- C. A description of all deviations from the Scope of Work and Schedule (Exhibit D of the PPCD) during the current month and any planned deviations in the upcoming month
- D. For any deviations from the schedule, a plan for recovering lost time and maintaining compliance with the schedule
- E. All raw data (including laboratory analyses) received by LMI during the past month and an identification of the source of the sample
- F. A list of deliverables for the upcoming month if different from the schedule

The following describes the actions taken during the Fourth Quarter of 2021 to implement the requirements of the PPCD:



A. List of On-Site Activities and Progress During Fourth Quarter 2021

- No on-Site activities were completed during Fourth Quarter 2021.
- Aspect received amended street use permits on October 5, 2021 to complete the well decommissioning and installation work as described in the *Site Closure Work Plan* submitted to Ecology on July 29, 2021, and approved on July 30, 2021. Field preparation activities began following receipt of the permits, and work is scheduled for January 12 to 14, 2022.

B. Deviations from Required Tasks Not Otherwise Documented

- No deviations from required tasks not otherwise documented occurred during Fourth Quarter 2021.

C. & D. Deviations from Project Scope of Work or Schedule and Plans for Recovering Lost Time

- Quarterly compliance groundwater monitoring was paused until a new groundwater monitoring well (MW115) has been installed in the Fauntleroy sidewalk right-of-way (near where the RW wells are being decommissioned), per approval by Ecology on June 28, 2021. The new well installation is scheduled for January 12 to 14, 2022, and quarterly groundwater monitoring will resume thereafter.

E. Raw Data Received from the Laboratory

- There was no data received from the laboratory in Fourth Quarter 2021.

F. List of Deliverables and Key Activities for Upcoming Quarter

- Elements of the *Site Closure Work Plan* dated July 29, 2021, are scheduled to be completed in First Quarter 2022, including decommissioning of wells RW01 to RW05, and installation of replacement monitoring well MW115. Groundwater monitoring will resume following installation of MW115.

Schedule

The following is the schedule¹ of remedial actions completed under the PPCD:

Cleanup Plan Task	Status: Date
UST Fuel Removal and Station Shutdown	Conducted: July 2013
Installation of Shoring for UST removal	Conducted: November 2013
UST System Cleaning and Removal	Conducted: December 2013
Submit UST Removal Report	Conducted: January 2014
Permitting for Wells	Conducted: May 2014
Master Use Permit	Conducted: June 2014
Install Dewatering Wells (8 Wells)	Conducted: July 2014
Install West Bounding Well MW107 (post demolition)	Conducted: October 2014
SKS Site Demolition and Hoist Removal	Conducted: October–November 2014
Construct Dewatering System in ROW Wells	Conducted: March 2015
Operate Dewatering System	Conducted: March–June 2015
Contaminated Soil Excavation and Confirmation Sampling	Conducted: March–May 2015
Removal of Three Previously Unknown USTs	Conducted: March 2015
Backfill Excavation and Install Membrane Barrier	Conducted: August–September 2015
Install Compliance Wells MW108, MW109, and MW110	Conducted: September 2015
Prepare Interim Cleanup Action Report	Conducted: December 2015–February 2016
First Quarter Post Cleanup Groundwater Monitoring	Conducted: March 2016
Submit preliminary Cleanup Action Report	Conducted: October 2016
Notice of Intent to Decommission Wells	Conducted: May 2017
Groundwater Elevation Study	Conducted: 2017–2019
Revised Agency-Review Cleanup Action Report	Conducted: January 2018
Alaska Street well closure technical meeting	Conducted: May 2018
Well Installation of MW113	Conducted: March 2018
Well Installation of MW111	Conducted: October 2018
Well Installation of MW112	Conducted: March 2019
Well Decommissioning (RW06–RW09, MW107)	Conducted: December 2018
Well Decommissioning of MW103	Conducted: April 2020
Well Decommissioning of MW102	Conducted: January 2021
Implementation of Injections Pilot Study	Conducted: January–February 2021
Preparation of Site Closure Work Plan	Ongoing: July 2021
Decommissioning of RW01 through RW05	Planned: January 2022
Installation of MW115	Planned: January 2022
Quarterly Groundwater Monitoring	Ongoing from 2016 to 2021; postponed for Q2 to Q4 2021; will resume Q1 2022

¹ Schedule elements prior to April 2020 are as reported in SoundEarth Strategies' *Fourth Quarter 2019 Progress Report* dated January 27, 2020.

Washington State Department of Ecology
January 10, 2022

Project No. 160328

Sincerely,

Aspect consulting, LLC



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