

April 11, 2022

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

Re: Progress Report, SKS Shell Station Site, First Quarter 2022 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

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The following describes the actions taken during the First Quarter of 2022 to implement the requirements of the PPCD:

A. List of On-Site Activities and Progress During First Quarter 2022

- Decommissioning of dewatering wells RW01 through RW05, formerly situated in Fauntleroy Way SW, was completed on January 12, 2022 in accordance with the *Site Closure Work Plan* submitted to Ecology on July 29, 2021 and approved on July 30, 2021.
- Installation and development of new groundwater compliance well, MW115, in Fauntleroy Way SW was completed on January 13 and 14, 2022 in accordance with the *Site Closure Work Plan*. Turbidity levels remained high during these days, so additional development of MW115 was performed on March 9, 2022. At end of day on March 9, groundwater purged from MW115 was visibly clear and development was considered complete.
- Investigation derived waste (IDW) from the dewatering well decommissioning was profiled and disposed of as non-hazardous waste at the LaFarge disposal facility in Seattle, Washington.
- Quarterly compliance groundwater monitoring for all Site wells, including new well MW115, occurred on March 24, 2022. In accordance with the *Site Closure Work Plan*, all Site wells were gauged and sampled for the First Quarter 2022 event. The groundwater monitoring report is currently being prepared.

B. Deviations from Required Tasks Not Otherwise Documented

• No deviations from required tasks not otherwise documented occurred during First Quarter 2022.

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

• No deviations from the project scope of work or schedule occurred during First Quarter 2022.

E. Raw Data Received from the Laboratory

• There was no data received from the laboratory in First Quarter 2022. Data from the First Quarter 2022 groundwater compliance monitoring event will be presented in the groundwater monitoring report that is currently being prepared.

F. List of Deliverables and Key Activities for Upcoming Quarter

• The First Quarter 2022 groundwater monitoring report is currently being prepared and will be submitted to Ecology in Second Quarter 2022.

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	Conducted: July 2021
Decommissioning of RW01 through RW05	Conducted: January 2022
Installation of MW115	Conducted: January 2022
Quarterly Groundwater Monitoring	Ongoing from 2016 to at least 2023

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 April 11, 2022

Project No. 160328

Sincerely,
Aspect consulting, LLC

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