

January 12, 2022

Tanner Bushnell  
Washington State Department of Ecology  
Northwest Regional Office  
PO Box 330316  
Shoreline, WA 98133-9716

**RE: PROGRESS REPORT FOR FOURTH QUARTER 2021  
BNSF FORMER MAINTENANCE AND FUELING FACILITY  
SKYKOMISH, WASHINGTON  
CONSENT DECREE NO. 07-2-33672-9 SEA  
FARALLON PN: 683-071**

Dear Tanner Bushnell:

This quarterly progress report has been prepared on behalf of BNSF Railway Company (BNSF) to document the activities conducted from October through December 2021 at the BNSF Former Maintenance and Fueling Facility in Skykomish, Washington (herein referred to as the Site). This quarterly progress report was prepared in accordance with the requirements of Section XI of Consent Decree No. 07-2-33672-9 SEA (Consent Decree) dated October 19, 2007 between the Washington State Department of Ecology (Ecology) and BNSF.

This quarterly progress report covers the period from October 1 through December 31, 2021 for the cleanup actions being conducted at the Site, and includes the following:

- A summary of on-Site activities conducted during the quarterly reporting period;
- A summary of the status of raw data (including laboratory analyses) received by BNSF during the quarterly reporting period, and identification of the source of the samples;
- A summary of deviations from tasks required by the Consent Decree not otherwise documented in project plans or amendment requests;
- A description of deviations from the 2007 Cleanup Action Plan<sup>1</sup> and the schedule contained therein during the quarterly reporting period, and any planned deviations in the upcoming quarter;
- If deviations in the schedule are reported, a plan for recovering lost time and maintaining compliance with the schedule; and
- A list of deliverables for the upcoming quarterly reporting period.

## ON-SITE ACTIVITIES

The following activities were conducted at the Site:

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<sup>1</sup> *Cleanup Action Plan for BNSF Former Maintenance and Fueling Facility, Skykomish, Washington*, dated October 2007 prepared by Ecology for BNSF Railway Company.



## October 2021

- Hydraulic Control and Containment System (HCC) System operation and maintenance, performance monitoring, and weekly National Pollutant Discharge Elimination System (NPDES) Permit effluent sampling were conducted by Glacier Environmental Services, Inc. (Glacier) of Mukilteo, Washington on October 5, 14, 22, and 26, 2021.
- Shut-down of the HCC System occurred on October 24, 2021 due to a power outage. The HCC System was restarted approximately 44 hours after shut-down.
- Manual shut-down of the HCC System occurred on October 26, 2021 with approval from Ecology's Toxic Cleanup Program,<sup>2</sup> pending investigation of a reported exceedance of the total petroleum hydrocarbons (TPH) discharge limit of 208 micrograms per liter in the effluent sample collected on October 14, 2021, and a routine change-out of the granulated activated carbon in the treatment system. System shut-down continued through the end of October 2021.

The effluent sample was reanalyzed using the same extraction as the original analysis. TPH was detected at a concentration of 187 micrograms per liter for the reanalyzed effluent sample collected on October 14, 2021, which is less than the discharge limit of 208 micrograms per liter. Based on the result from the reanalysis and subsequent weekly sampling performed in October 2021, no exceedance of the discharge limit for TPH occurred.

- Vegetation and biological monitoring and vegetation maintenance at the 5<sup>th</sup> Street Bridge Project Area was conducted on October 14, 2021.

## November 2021

- The HCC System was restarted on November 4, 2021, following manual system shut-down for change-out of the granulated activated carbon in treatment system tanks that began on October 26, 2021; and
- HCC System operation and maintenance, performance monitoring, and weekly NPDES Permit effluent sampling were conducted by Glacier on November 4, 8, 16, and 23, 2021.

## December 2021

- HCC System operation and maintenance, performance monitoring, and weekly NPDES Permit effluent sampling were conducted by Glacier on December 1, 7, 16, 21, and 27, 2021.
- Shut-down of the HCC System occurred on December 25, 2021 due to a motor drive fault. The HCC System was restarted approximately 8 hours after shut-down.
- Shut-down of the HCC System occurred on December 26, 2021 due to a motor drive fault. The HCC System was restarted approximately 21 hours after shut-down.
- Shut-down of the HCC System occurred on December 29, 2021 due to a motor drive fault. The HCC System was restarted approximately 24 hours after shut-down.

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<sup>2</sup> Email Regarding Skykomish System Shutdown Request. From Tanner Bushnell, Washington State Department of Ecology. To Shane DeGross, BNSF Railway Company. October 26, 2021.



- HCC System quarterly groundwater monitoring was conducted on December 14 and 15, 2021 in accordance with the *2011 Operation and Maintenance Manual for the Hydraulic Control and Containment System, Former Maintenance and Fueling Facility – Skykomish, WA* dated April 8, 2011.

## **RAW DATA**

Laboratory analytical data from the December 2021 HCC System quarterly groundwater sampling event and September, October, and November 2021 HCC System and NPDES Permit compliance sampling events were independently validated by Saylor Data Solutions, Inc. of Kirkland, Washington. Analytical data from the sampling activities were entered into the project-specific database.

## **DEVIATIONS AND CORRECTIONS**

As noted above, the HCC System was manually shut down on October 26, 2021 for investigation of a reported exceedance of the TPH discharge limit of 208 micrograms per liter in the effluent sample collected on October 14, 2021 and change-out of the granulated activated carbon in the treatment system. The system was restarted on November 4, 2021.

## **DELIVERABLES**

The following deliverables were submitted to Ecology:

- NPDES Discharge Monitoring Reports for September, October, and November 2021 submitted through Ecology's web portal on October 22, November 19, and December 15, 2021, respectively;
- Progress Report for Third Quarter 2021, submitted on October 12, 2021; and
- Technical Memorandum Regarding the 5<sup>th</sup> Street Bridge Area Plant Conditions and Native Vegetations Monitoring – Year 10, submitted to the U.S. Army Corps of Engineers on November 22, 2021.

## **DOCUMENTS PENDING AGENCY REVIEW**

The following document has been submitted as draft and is pending Ecology review:

- Biosparge Pilot Study and Engineering Design Work Plan, submitted on October 2, 2020.

## **TECHNICAL AND REGULATORY MEETINGS**

There were no technical or regulatory meetings.



## FIRST QUARTER 2022 ACTIVITIES, MEETINGS, AND DELIVERABLES

### Activities

The following activities are scheduled for the Site in the first quarter of 2022:

- NPDES compliance sampling is scheduled for January, February, and March 2022, if discharge occurs;
- Sampling of the granulated active carbon within the West Gate of the HCC System to current status and remaining capacity of the Granulated Activated Carbon is scheduled for February 2022; and
- A semiannual groundwater monitoring event is scheduled for March 2021 in accordance with the Long-Term Monitoring Plan dated November 9, 2020.

### Meetings

There are no meetings currently scheduled for the first quarter of 2022.

### Deliverables

- The December 2021 and January and February 2022 NPDES Discharge Monitoring Reports will be submitted through Ecology's web portal by January 28, February 28, and March 28, 2022, respectively; and
- The 2021 Annual Long-Term Monitoring Report and 2021 Annual Hydraulic Control and Containment System Operations Report will be submitted to Ecology in the first quarter of 2022.

Please contact either of the undersigned at (425) 295-0800 if you have questions regarding this progress or the project.

Sincerely,

**Farallon Consulting, L.L.C.**

Amanda Meugniot, L.G.  
Associate Geologist

Amy Essig Desai  
Principal Scientist

cc: Shane DeGross, BNSF  
Brad Petrovich and Jeanne Tran, Ecology  
Gary West and Teddy Jo Ryder, Skykomish Residents  
Henry Sladek, Town of Skykomish  
David Carson, Carson Law Group P.S.  
Thomas Jay and Kimberly McCullough, Skykomish School District  
John Robinson, U.S. Forest Service

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