

April 12, 2022

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

**RE: PROGRESS REPORT FOR FIRST QUARTER 2022  
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 January through March 2022 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 January 1 through March 31, 2022 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.



## January 2022

- Hydraulic control and containment (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 January 7, 12, 18, and 24, 2022.
- Shut-down of the HCC System occurred on January 4, 2022 due to an area power outage. The HCC System was restarted approximately 71.5 hours after shut-down.
- Shut-down of the HCC System occurred on January 12, 2022 during maintenance activities. The HCC System was restarted approximately 2.5 hours after shut-down.

## February 2022

- HCC System operation and maintenance, performance monitoring, and weekly NPDES Permit effluent sampling were conducted by Glacier on February 2, 10, 15, and 25, 2022.
- Shut-down of the HCC System occurred on February 23, 2022 due to a routine carbon changeout. The HCC System was restarted approximately 48 hours after shut-down.

## March 2022

- HCC System operation and maintenance, performance monitoring, and weekly NPDES Permit effluent sampling were conducted by Glacier on March 1, 9, 17, 24, and 31, 2022.
- Site-wide, liquid-level gauging and groundwater sampling were conducted on March 22, 23, 24, and 25, 2022 in accordance with the Long-Term Monitoring Plan,<sup>2</sup> the 2011 Operation and Maintenance Manual,<sup>3</sup> and the 2014 Addendum.<sup>4</sup>
- Sampling of the granulated active carbon within the West Gate of the HCC System was conducted on March 23, 2022.

## RAW DATA

Laboratory analytical data from the December 2021 and January and February 2022 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.

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<sup>2</sup> *Final Long-Term Monitoring Plan, BNSF Former Maintenance and Fueling Facility, Skykomish, Washington* dated November 9, 2020, prepared by Farallon (Long-Term Monitoring Plan).

<sup>3</sup> *2011 Operation and Maintenance Manual for the Hydraulic Control and Containment System, Former Maintenance and Fueling Facility – Skykomish, WA* dated April 8, 2011, prepared by AECOM, Inc. (2011 Operation and Maintenance Manual).

<sup>4</sup> *2014 Addendum to the Operation and Maintenance Manual for the Hydraulic Control and Containment, BNSF Former Maintenance and Fueling Facility, Skykomish, Washington* dated September 10, 2014, prepared by Farallon (2014 Addendum).



## **DEVIATIONS AND CORRECTIONS**

No deviations occurred, and no corrections were required.

## **DELIVERABLES**

The following deliverables were submitted to Ecology:

- NPDES Discharge Monitoring Reports for December 2021 and January and February 2022 were submitted through Ecology's web portal on January 25, February 25, and March 25, 2022, respectively;
- Progress Report for Fourth Quarter 2021, submitted on January 12, 2022;
- Draft 2021 Annual Long-Term Monitoring Report, submitted on March 28, 2022; and
- Draft 2021 Annual Hydraulic Control and Containment System Operations Report, submitted on March 28, 2022.

## **DOCUMENTS PENDING AGENCY REVIEW**

The following documents have been submitted as draft and are pending Ecology review:

- Biosparge Pilot Study and Engineering Design Work Plan, submitted on October 2, 2020;
- Draft 2021 Annual Long-Term Monitoring Report, submitted on March 28, 2022; and
- Draft 2021 Annual Hydraulic Control and Containment System Operations Report, submitted on March 28, 2022.

## **TECHNICAL AND REGULATORY MEETINGS**

Ecology will be presenting an update on the ongoing cleanup action at the Skykomish Town Council meeting on April 11, 2022.

## **SECOND QUARTER 2022 ACTIVITIES, MEETINGS, AND DELIVERABLES**

### **Activities**

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

- NPDES compliance sampling is scheduled for April, May, and June 2022, if discharge occurs; and
- A quarterly HCC System groundwater monitoring event is scheduled for June 2022 in accordance with the 2011 Operation and Maintenance Manual and the 2014 Addendum.

### **Meetings**

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



## Deliverables

- The March, April, and May 2022 NPDES Discharge Monitoring Reports will be submitted through Ecology's web portal by April 28, May 28, and June 28, 2022, respectively; and
- The final 2021 Annual Long-Term Monitoring Report and 2021 Annual Hydraulic Control and Containment System Operations Report are anticipated to be submitted to Ecology in the second quarter of 2022 pending receipt of Ecology comments.

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  
Ian Fawley 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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