

January 15, 2021

Tanner Bushnell
Washington State Department of Ecology
Northwest Regional Office
3190 160th Avenue Southeast
Bellevue, Washington 98008-5452

**RE: PROGRESS REPORT FOR FOURTH QUARTER 2020
BNSF FORMER MAINTENANCE AND FUELING FACILITY
SKYKOMISH, WASHINGTON
CONSENT DECREE NO. 07-2-33672-9 SEA
FARALLON PN: 683-067**

Dear Tanner Bushnell:

Farallon Consulting, L.L.C. (Farallon) has prepared this quarterly progress report on behalf of BNSF Railway Company (BNSF) to document the activities conducted from October through December 2020 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, 2020 for the cleanup actions being conducted at the Site, and includes:

- 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 Cleanup Action Plan 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.

October 2020

- Hydraulic Control and Containment (HCC) passive operation pilot study bimonthly groundwater monitoring event was conducted on October 19, 2020;
- Vegetation maintenance was conducted in the FMC West Wetland on October 28, 2020; and
- HCC operation and maintenance and National Pollutant Discharge Elimination System (NPDES) Permit compliance sampling was conducted on October 31, 2020.

November 2020

- No activities were conducted at the Site.

December 2020

- HCC system passive operation pilot study bimonthly groundwater monitoring was conducted on December 16, 2020; and
- HCC operation and maintenance and NPDES Permit compliance sampling was conducted on December 17, 2020.

RAW DATA

Laboratory analytical data from the following sampling activities were independently validated by Saylor Data Solutions, Inc. of Kirkland, Washington: October and December 2020 HCC system and NPDES Permit compliance sampling events and October and December 2020 HCC passive operation pilot study bimonthly groundwater monitoring events.

Analytical data from the following sampling activities were entered into the project-specific database: October and December 2020 HCC system and NPDES Permit compliance sampling events and October and December 2020 HCC passive operation pilot study bimonthly groundwater monitoring events.

DEVIATIONS AND CORRECTIONS

No deviations occurred and no corrections were required.

DELIVERABLES

The following deliverables were submitted to Ecology:

- NPDES Discharge Monitoring Reports for September, October, and November 2020, submitted through Ecology's web portal on October 26, November 23, and December 22, 2020, respectively;



- Biosparge Pilot Study and Engineering Design Work Plan, submitted on October 2, 2020;
- Progress Report for Third Quarter 2020, submitted on October 12, 2020; and
- Final Draft Long-Term Monitoring Plan, submitted on November 9, 2020.

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

Representatives from BNSF, Farallon, and Ecology had a conference call on October 20, 2020 to discuss the proposed Biosparge Pilot Study.

FIRST QUARTER 2021 ACTIVITIES, MEETINGS, AND DELIVERABLES

Activities

The following activities are scheduled for the Site in the first quarter of 2021:

- Resuming active operation of the HCC System is scheduled for the week of January 4, 2021;
- NPDES compliance sampling is scheduled for January, February, and March 2021 if discharge occurs; and
- A semiannual groundwater monitoring event is scheduled for March 2020 in accordance with the Final Long-Term Monitoring Plan dated November 9, 2020.

Meetings

There are no meetings currently scheduled for the first quarter of 2021.

Deliverables

The December 2020 and January and February 2021 NPDES Discharge Monitoring Reports will be submitted through Ecology's web portal by January 28, February 28, and March 28, 2021, respectively.

The draft 2020 Annual HCC System Operations Report and the draft 2020 Site-Wide Groundwater Monitoring Report will be submitted to Ecology by March 31, 2020. The 2020 HCC System Passive Operation Pilot Study Report will be submitted to Ecology as an appendix to the 2020 Annual HCC System Operations Report.



CLOSING

Please contact either of the undersigned at (425) 295-0800 if you have questions regarding this progress report 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
Larry Johnson, FiberStory

AM/AED:mbg