California Oakland | Irvine



July 12, 2021

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

RE: PROGRESS REPORT FOR SECOND 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 April through June 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 April 1 through June 30, 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 Plan¹ 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

-

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



The following activities were conducted at the Site.

April 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.
- Shut-down of the HCC System occurred on April 9, 2021 to facilitate a carbon media replacement event at the water treatment plant. The HCC System was restarted approximately 48 hours after shut-down.

May 2021

- HCC System operation and maintenance, performance monitoring, and weekly NPDES Permit effluent sampling were performed.
- There were no shut-down events of the HCC System during May 2021.
- 24 monitoring wells were decommissioned during the week of April 19, 2021 in accordance with the Ecology-approved Long-Term Monitoring Plan dated November 9, 2020.

June 2021

- HCC System operation and maintenance, performance monitoring, and weekly NPDES Permit effluent sampling were performed.
- Shut-down of the HCC System occurred on June 23, 2021 due to a power loss to the HCC System computer. The HCC System restarted approximately 24 hours after shut-down.
- Shut-down of the HCC System occurred on June 25, 2021 due to a power loss to the HCC System computer. The HCC System restarted approximately 4 hours after shut-down.
- Shut-down of the HCC System occurred on June 27, 2021 due to a power loss to the HCC System computer. The HCC System restarted approximately 20 hours after shut-down.
- Monitoring well 1C-W-1 was decommissioned on June 28, 2021 in accordance with the Long-Term Monitoring Plan dated November 9, 2020.
- HCC System quarterly groundwater monitoring was conducted on June 29 and June 30, 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 following sampling activities were independently validated by Sayler Data Solutions, Inc. of Kirkland, Washington: April and May 2021 HCC system and NPDES Permit compliance sampling events.



Analytical data from the following sampling activities were entered into the project-specific database: April and May 2021 HCC system and NPDES Permit compliance sampling 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 March, April, and May 2021 submitted through Ecology's web portal on April 19, May 20, and June 21, 2021, respectively;
- Progress Report for First Quarter 2021, submitted on April 13, 2021;
- Final 2020 Site-Wide Groundwater Monitoring Report, submitted on May 25, 2021; and
- Final 2020 Annual Hydraulic Control and Containment System Operations Report, submitted on May 25, 2021.

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.

TECHNICAL AND REGULATORY MEETINGS

There were no technical or regulatory meetings.

THIRD QUARTER 2021 ACTIVITIES, MEETINGS, AND DELIVERABLES

Activities

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

- NPDES compliance sampling is scheduled for July, August, and September 2021, if discharge occurs;
- Vegetation and biological monitoring and vegetation maintenance at the 5th Street Bridge Project Area are scheduled for July 2021; and
- A semiannual groundwater monitoring event is scheduled for September 2021 in accordance with the Long-Term Monitoring Plan dated November 9, 2020.

Meetings

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



Deliverables

The June, July, and August 2021 NPDES Discharge Monitoring Reports will be submitted through Ecology's web portal by July 28, August 28, and September 28, 2021, respectively.

CLOSING

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

amenda M. Mengriot

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