

October 12, 2021

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

**RE: PROGRESS REPORT FOR THIRD 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 July through September 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 July 1 through September 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.

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



ON-SITE ACTIVITIES

The following activities were conducted at the Site.

July 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 July 2, 2021 due to a power surge, resulting in a motor drive fault. The HCC System was restarted approximately 42 hours after shut-down.
- Vegetation and biological monitoring and vegetation maintenance at the 5th Street Bridge Project Area was conducted on July 29, 2021.

August 2021

- HCC System operation and maintenance, performance monitoring, and weekly NPDES Permit effluent sampling were performed.
- Shut-down of the HCC System occurred on August 11, 2021 due to a power surge, resulting in a motor drive fault. The HCC System restarted approximately 30 minutes after shut-down.
- Shut-down of the HCC System occurred on August 12, 2021 due to a motor drive fault. The HCC System restarted approximately 3.5 hours after shut-down.
- Shut-down of the HCC System occurred on August 13, 2021 due to a motor drive fault. The HCC System restarted approximately 48 hours after shut-down.

September 2021

- HCC System operation and maintenance, performance monitoring, and weekly NPDES Permit effluent sampling were performed with the following exception:
 - Weekly sampling required for Outfall 003 under Permit No. WA0032123 was not completed for the period between September 19 and 25, 2021.
- Shut-down of the HCC System occurred on September 9, 2021 due to a motor drive fault. The HCC System restarted approximately 10 hours after shut-down.
- Site-wide, liquid-level gauging and groundwater sampling was conducted on September 21, 22, and 23, 2021.

RAW DATA

Laboratory analytical data from the following sampling activities were independently validated by Saylor Data Solutions, Inc. of Kirkland, Washington: June, July, and August 2021 HCC system



and NPDES Permit compliance sampling events; March 2021 semi-annual site-wide groundwater sampling event; and June 2021 quarterly HCC System groundwater sampling event.

Analytical data from the following sampling activities were entered into the project-specific database: June, July, and August 2021 HCC system and NPDES Permit compliance sampling events; March 2021 semi-annual site-wide groundwater sampling event; and June 2021 quarterly HCC System groundwater sampling event.

DEVIATIONS AND CORRECTIONS

Weekly sampling required for Outfall 003 under Permit No. WA0032123 was not completed for the period between September 19 and 25, 2021. Noncompliance was limited to the period of September 19 through 25, 2021, as weekly samples were collected on September 15, 2021 (for the period of September 12 through 18, 2021) and September 29, 2021 (for the period of September 26 through September 30, 2021). Corrective action, including scheduled tracking of resources and sample collection, will be taken to prevent recurrence of this violation. Ecology was notified of this noncompliance in writing by BNSF on October 27, 2021. The noncompliance also will be recorded on the September Discharge Monitoring Report to be submitted to Ecology on or before October 28, 2021.

DELIVERABLES

The following deliverables were submitted to Ecology:

- NPDES Discharge Monitoring Reports for June, July, and August 2021 submitted through Ecology's web portal on July 22, August 26, and September 24, 2021, respectively.
- Progress Report for Second Quarter 2021, submitted on July 12, 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.

FOURTH QUARTER 2021 ACTIVITIES, MEETINGS, AND DELIVERABLES

Activities

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

- NPDES compliance sampling is scheduled for October, November, and December 2021, if discharge occurs;
- A planting event at the 5th Street Bridge Project Area is scheduled for October 2021; and



- A quarterly HCC System groundwater monitoring event is scheduled for December 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, prepared by AECOM for The BNSF Railway Company.

Meetings

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

Deliverables

The September, October, and November 2021 NPDES Discharge Monitoring Reports will be submitted through Ecology's web portal by October 28, November 28, and December 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
David Carson, Carson Law Group P.S.
Thomas Jay and Kimberly McCullough, Skykomish School District
John Robinson, U.S. Forest Service
Larry Johnson, FiberStory

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