

July 12, 2022

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

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

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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.



## ON-SITE ACTIVITIES

The following activities were conducted at the Site:

### April 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 April 5, 14, and 26, 2022 and by Farallon personnel on April 21, 2022.

### May 2022

- HCC System operation and maintenance, performance monitoring, and weekly NPDES Permit effluent sampling were conducted by Glacier on May 4, 12, 16, 24, and 31, 2022.
- An approximately 1-hour system shut-down on May 18, 2022 due to a power outage.
- An approximately 40-hour system shut-down from May 22 to 23, 2022 due to system alarms pertaining to equalization tank high level.
- A manual shut-down of the HCC System occurred on May 31, 2022 pending investigation of total petroleum hydrocarbons (TPH) reportedly detected at a concentration exceeding the discharge limit of 208 micrograms per liter ( $\mu\text{g/l}$ ) in the effluent sample collected on May 16, 2022, and a routine changeout of the granulated activated carbon (GAC) in the treatment system. System shut-down continued through the end of May 2022.

TPH was detected at a concentration of 270  $\mu\text{g/l}$  in the weekly effluent sample collected on May 16, 2022 for the week of May 15 to 21, 2022, which exceeded the discharge limit of 208  $\mu\text{g/l}$ . Farallon reviewed the results of the effluent samples collected the previous week on May 12, 2022 and subsequent weeks on May 24 and 31, 2022; TPH was detected at concentrations less than the discharge limit in all samples. Based on those results and previously identified laboratory errors, the reported results for the May 16, 2022 effluent sample were suspected to be due to laboratory error. The system remained shut down until June 17, 2022, pending changeout of the GAC in the treatment system, discussed below, to mitigate any risk of discharge with potential concentrations of TPH in excess of the discharge limit.

### June 2022

- The GAC changeout was completed on June 15, 2022. The GAC was allowed to soak for approximately 48 hours and the HCC system was restarted on June 17, 2022.
- HCC System operation and maintenance, performance monitoring, and weekly NPDES Permit effluent sampling were conducted by Glacier on June 17, 24, and 29, 2022.



- Site-wide, liquid-level gauging and semiannual groundwater resampling events were conducted on June 6, 7, and 8, 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> due to laboratory quality assurance and quality control issues impacting the March 2022 data usability.

## RAW DATA

Laboratory analytical data from the March, April, and May 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.

Laboratory analytical data from the March 2022 semiannual site-wide groundwater sampling event were evaluated by Farallon and Environmental Standards, Inc of Valley Forge, Pennsylvania (ESI). Multiple laboratory quality assurance and quality control issues associated with the laboratory reporting data for the March 2022 semiannual groundwater monitoring and sampling event were identified. Farallon and ESI determined that the laboratory data did not meet the project quality objectives, and the data were rejected for use. As discussed above, the semiannual groundwater monitoring and sampling were conducted again in June 2022, and the results replace the March 2022 data. The March and June 2022 data will be included in the 2022 Annual Long-Term Monitoring Report.

## DEVIATIONS AND CORRECTIONS

As noted above, the HCC System was shut down manually on May 31, 2022 for investigation of a reported exceedance of the TPH discharge limit of 208 µg/l in the effluent sample collected on May 16, 2022 and changeout of the GAC in the treatment system. The system was restarted on June 17, 2022.

## DELIVERABLES

The following deliverables were submitted to Ecology:

- NPDES Discharge Monitoring Reports for March, April, and May 2022 were submitted through Ecology's web portal on April 25, June 1, and June 27, 2022, respectively; and
- Progress Report for First Quarter 2022, submitted on April 12, 2022.

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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)



## **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**

BNSF and Farallon met with Ecology on June 8, 2022 to discuss the forthcoming NPDES permit renewal. The discharge location and requirements for sampling and analysis of discharge were discussed during the meeting.

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

### **Activities**

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

- NPDES compliance sampling is scheduled for July, August, and September 2022, if discharge occurs;
- A changeout of the GAC media in the West Gate is scheduled for September 2022; and
- A semiannual groundwater monitoring event is scheduled for September 2022 in accordance with the Long-Term Monitoring Plan.

### **Meetings**

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

### **Deliverables**

- The June, July, and August 2022 NPDES Discharge Monitoring Reports will be submitted through Ecology's web portal by July 28, August 28, and September 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 third 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

AM/AED:eh