

October 14, 2022

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

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

### **July 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 July 6, 12, and 26, 2022 and by Farallon on July 21, 2022.

### **August 2022**

- HCC System operation and maintenance, performance monitoring, and weekly NPDES Permit effluent sampling were conducted by Glacier on August 5, 8, 17, 24, and 30, 2022.
- Recovery well RW-05 was redeveloped by Cascade Drilling, LP of Woodinville, Washington to remove accumulated fine-grained sediment from the well to facilitate operation of the pump associated with the HCC System.

### **September 2022**

- HCC System operation and maintenance, performance monitoring, and NPDES Permit effluent sampling were conducted by Glacier on September 7 and 30, 2022.
- Manual shut-down of the HCC System occurred on September 7, 2022 for the routine change-out of the granulated activated carbon (GAC) in the treatment system. The GAC was allowed to soak for approximately 48 hours, and the HCC system was restarted on September 10, 2022.

## **RAW DATA**

Laboratory analytical data from the June, July, and August 2022 HCC System and NPDES Permit compliance sampling events were independently validated by Sayler Data Solutions, Inc. of Kirkland, Washington. Analytical data from the sampling activities were entered into the project-specific database.

## **DEVIATIONS AND CORRECTIONS**

As noted above, the HCC System was shut down manually on September 7, 2022 for the routine change-out of the GAC in the treatment system. The GAC was allowed to soak for approximately 48 hours, and the HCC system was restarted on September 10, 2022.

Automatic shut-down of the HCC System occurred on September 10, 2022 due to an area-wide power outage. Access to the HCC system was not available between September 10 and 25, 2022 due to nearby wildfire activity and highway closures. The HCC System was restarted on September 25, 2022.



Semiannual groundwater monitoring in accordance with the Long-Term Monitoring Plan was not conducted in September 2022 due to nearby wildfire activity and highway closures restricting access to the Site. Semiannual groundwater monitoring is rescheduled to be conducted between October 25 and 27, 2022.

## **DELIVERABLES**

The following deliverables were submitted to Ecology:

- NPDES Discharge Monitoring Reports for June, July, and August 2022 were submitted through Ecology's web portal on July 25, August 18, and September 27, 2022, respectively; and
- Progress Report for Second Quarter 2022, submitted on July 12, 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**

There were no technical or regulatory meetings.

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

### **Activities**

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

- NPDES compliance sampling is scheduled for October, November, and December 2022, if discharge occurs;
- A change-out of the GAC media in the West Gate is scheduled for October 2022; and
- A semiannual groundwater monitoring event is scheduled for October 2022 in accordance with the Long-Term Monitoring Plan.

### **Meetings**

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

### **Deliverables**

- The September 2022 NPDES Discharge Monitoring Report will be submitted through Ecology's web portal by October 28, 2022.



- 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 fourth 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  
Principal Scientist

cc: Shane DeGross, BNSF  
Ian Fawley and Jeanne Tran, Ecology  
Henry Sladek, Town of Skykomish

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