

January 13, 2023

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

**RE: PROGRESS REPORT FOR FOURTH 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 October through December 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 October 1 through December 31, 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 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:

October 2022

- Hydraulic control and containment (HCC) System operation and maintenance, performance monitoring, and National Pollutant Discharge Elimination System (NPDES) Permit effluent sampling were conducted by Glacier Environmental Services, Inc. (Glacier) of Mukilteo, Washington on October 11, 2022 and by Farallon on October 27, 2022.
- Change-out of the granulated activated carbon (GAC) media in the East Vault of the West Gate of the HCC System barrier wall by Glacier between October 6 and 18, 2022. Activities included Site preparation, removal of sentry wells S2-BU and S2-BD, removal of spent GAC and pea gravel mixture, replacement of GAC and pea gravel, and Site restoration.
- Manual shut-down of the HCC System occurred on October 20, 2022 due to damage to piping on the HCC System manifold. The system was restarted approximately 24 hours after shut-down.
- Site-wide, liquid-level gauging and semiannual groundwater sampling on October 25, 26, and 27, 2022 in accordance with the Long-Term Monitoring Plan,² the 2011 Operation and Maintenance Manual,³ and the 2014 Addendum.⁴ Semiannual groundwater sampling was conducted in October due to limited Site access and hazardous Site conditions due to the Bolt Creek Fire during September 2022.

November 2022

- HCC System operation and maintenance, performance monitoring, and NPDES Permit effluent sampling were conducted by Farallon on November 10, 2022 and Glacier on November 22, 2022.
- Reinstallation of sentry wells S2-BU and S2-BD in the East Vault of the West Gate by Holt Services, Inc. of Milton, Washington on November 16, 2022.
- Automatic shut-down of the HCC System occurred on November 5, 2022 due to an area-wide power outage. The HCC System was restarted on November 10, 2022.
- Automatic shut-down of the HCC System occurred on November 29, 2022 due to an area-wide power outage. The HCC System was restarted on December 5, 2022.

² *Final Long-Term Monitoring Plan, BNSF Former Maintenance and Fueling Facility, Skykomish, Washington* dated November 9, 2020, prepared by Farallon. (Long-Term Monitoring Plan)

³ *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)

⁴ *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)



December 2022

- HCC System operation and maintenance, performance monitoring, and NPDES Permit effluent sampling were conducted by Farallon on December 7, 2022 and Glacier on December 20, 2022.
- HCC System quarterly groundwater monitoring was conducted on December 5, 6, and 7, 2022 in accordance with the 2011 Operation and Maintenance Manual.
- Automatic shut-down of the HCC System occurred on December 22, 2022 due to an area-wide power outage. The HCC System was restarted on January 3, 2023.

RAW DATA

Laboratory analytical data from the October Long-Term Monitoring semiannual groundwater sampling event; December 2022 HCC System quarterly groundwater sampling event; and October, November, and December 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.

DEVIATIONS AND CORRECTIONS

As noted above, the HCC System was shut down manually on October 20, 2022 due to damage to piping on the HCC System manifold. The system was restarted approximately 24 hours after shut-down.

Automatic shut-down of the HCC System occurred on November 5, 2022 due to an area-wide power outage. The HCC system was restarted on November 10, 2022.

Automatic shut-down of the HCC System occurred on November 29, 2022 due to an area-wide power outage. The HCC system was restarted on December 5, 2022.

Automatic shut-down of the HCC System occurred on December 22, 2022 due to an area-wide power outage. The HCC System was restarted on January 3, 2023.

Semiannual groundwater monitoring in accordance with the Long-Term Monitoring Plan was conducted in October 2022 due to limited Site access and hazardous Site conditions due to the Bolt Creek Fire during September 2022.

DELIVERABLES

The following deliverables were submitted to Ecology:

- NPDES Discharge Monitoring Report for September 2022 was submitted through Ecology's web portal on October 28, 2022; and
- Progress Report for Third Quarter 2022, submitted on October 14, 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.

FIRST QUARTER 2023 ACTIVITIES, MEETINGS, AND DELIVERABLES

Activities

The following activities are scheduled for the Site in the first quarter of 2023:

- NPDES compliance sampling is scheduled for January, February, and March 2023, if discharge occurs; and
- A semiannual groundwater monitoring event is scheduled for March 2023 in accordance with the Long-Term Monitoring Plan.

Meetings

There are no meetings currently scheduled for the first quarter of 2023.

Deliverables

- The Fourth Quarter of 2022 NPDES Discharge Monitoring Report will be submitted through Ecology's web portal by January 28, 2023;
- 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 first quarter of 2023 pending receipt of Ecology comments; and
- The 2022 Annual Long-Term Monitoring Report and 2022 Annual Hydraulic Control and Containment System Operations Report will be submitted to Ecology in the first quarter of 2023.



Please contact the undersigned at (425) 295-0800 if you have questions regarding this progress or the project.

Sincerely,

Farallon Consulting, L.L.C.

Amy Essig
Principal Scientist

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

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