



January 10, 2023

Dale Myers
Washington State Department of Ecology
15700 Dayton Ave North
Shoreline, Washington 98133

Re: Progress Report, SKS Shell Station Site, Fourth Quarter 2022
LMI – West Seattle Holdings, LLC PPCD No. 13-2-27556-2
Facility ID #39196282, Cleanup ID #6015
Aspect Project No. 160328

Dear Mr. Myers:

This progress report was prepared by Aspect Consulting, LLC (Aspect) on behalf of LMI – West Seattle Holdings, LLC (LMI) for the SKS Shell Station Site (Site), located at 3901 Southwest Alaska Street in Seattle, Washington, where post-cleanup compliance sampling and reporting is being completed after remedial excavation and redevelopment of the Site was completed in 2015. Cleanup and redevelopment of the Site has been completed in accordance with Washington Administrative Code (WAC) Chapter 173-340.

This progress report was prepared as a condition to Prospective Purchaser Consent Decree (PPCD) #13-2-27556-2 signed between LMI and the Washington State Department of Ecology (Ecology) for the Site, filed July 29, 2013, and amended April 16, 2015. Per the PPCD, “LMI shall submit to Ecology quarterly written Progress Reports that describe the actions taken during the previous month(s) to implement the requirements of this Decree.” The Progress Reports shall include the following:

- A. A list of on-Site activities that have taken place since the last reporting period
- B. A detailed description of any deviations from required tasks not otherwise documented in project plans or amendment requests
- C. A description of all deviations from the Scope of Work and Schedule (Exhibit D of the PPCD) during the current month and any planned deviations in the upcoming month
- D. For any deviations from the schedule, a plan for recovering lost time and maintaining compliance with the schedule
- E. All raw data (including laboratory analyses) received by LMI during the past month and an identification of the source of the sample
- F. A list of deliverables for the upcoming month if different from the schedule



The following describes the actions taken during the Fourth Quarter of 2022 to implement the requirements of the PPCD:

A. List of On-Site Activities and Progress During Fourth Quarter 2022

- Groundwater monitoring occurred on December 15, 2022. In accordance with the recommendations in the *Third Quarter 2022 Groundwater Monitoring Report* dated November 15, 2022 and submitted to Ecology via email on November 16, 2022, this event included groundwater sampling at well MW115 in Fauntleroy Way SW, and measurement of groundwater levels at the entire well network.

B. Deviations from Required Tasks Not Otherwise Documented

- No deviations from required tasks not otherwise documented occurred during Fourth Quarter 2022.

C. & D. Deviations from Project Scope of Work or Schedule and Plans for Recovering Lost Time

- No deviations from the project scope of work or schedule occurred during Fourth Quarter 2022.

E. Raw Data Received from the Laboratory

- Data from the December 15, 2022 groundwater sampling event was received from the laboratory on December 21, 2022. Data showed all Site contaminants of concern at concentrations below the MTCA cleanup levels in well MW115. Data is in the process of being validated and uploaded to EIM.

F. List of Deliverables and Key Activities for Upcoming Quarter

- The Fourth Quarter 2022 groundwater monitoring report is being prepared and will be submitted to Ecology for review during First Quarter 2023. The Fourth Quarter 2022 report will recommend proceeding with quarterly groundwater monitoring. Assuming Ecology agrees with the recommendation, then the next groundwater monitoring event will occur in First Quarter 2023.

Schedule

The following is the schedule¹ of remedial actions completed under the PPCD:

Cleanup Plan Task	Status: Date
UST Fuel Removal and Station Shutdown	Conducted: July 2013
Installation of Shoring for UST removal	Conducted: November 2013
UST System Cleaning and Removal	Conducted: December 2013
Submit UST Removal Report	Conducted: January 2014
Permitting for Wells	Conducted: May 2014
Master Use Permit	Conducted: June 2014
Install Dewatering Wells (8 Wells)	Conducted: July 2014
Install West Bounding Well MW107 (post demolition)	Conducted: October 2014
SKS Site Demolition and Hoist Removal	Conducted: October–November 2014
Construct Dewatering System in ROW Wells	Conducted: March 2015
Operate Dewatering System	Conducted: March–June 2015
Contaminated Soil Excavation and Confirmation Sampling	Conducted: March–May 2015
Removal of Three Previously Unknown USTs	Conducted: March 2015
Backfill Excavation and Install Membrane Barrier	Conducted: August–September 2015
Install Compliance Wells MW108, MW109, and MW110	Conducted: September 2015
Prepare Interim Cleanup Action Report	Conducted: December 2015–February 2016
First Quarter Post Cleanup Groundwater Monitoring	Conducted: March 2016
Submit preliminary Cleanup Action Report	Conducted: October 2016
Notice of Intent to Decommission Wells	Conducted: May 2017
Groundwater Elevation Study	Conducted: 2017–2019
Revised Agency-Review Cleanup Action Report	Conducted: January 2018
Alaska Street well closure technical meeting	Conducted: May 2018
Well Installation of MW113	Conducted: March 2018
Well Installation of MW111	Conducted: October 2018
Well Installation of MW112	Conducted: March 2019
Well Decommissioning (RW06–RW09, MW107)	Conducted: December 2018
Well Decommissioning of MW103	Conducted: April 2020
Well Decommissioning of MW102	Conducted: January 2021
Implementation of Injections Pilot Study	Conducted: January–February 2021
Preparation of Site Closure Work Plan	Conducted: July 2021
Decommissioning of RW01 through RW05	Conducted: January 2022
Installation of MW115	Conducted: January 2022
Quarterly Groundwater Monitoring	Conducted: 2016 to 2021
Biannual Groundwater Monitoring (First and Third Quarters)	Conducted: Q1 2022 and Q3 2022
Quarterly Groundwater Monitoring	Ongoing: Beginning Q4 2022

¹ Schedule elements prior to April 2020 are as reported in SoundEarth Strategies' *Fourth Quarter 2019 Progress Report* dated January 27, 2020.

Washington State Department of Ecology
January 10, 2023

Project No. 160328

Sincerely,

Aspect consulting, LLC



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