

April 15, 2024

Dale Myers
Washington State Department of Ecology
Northwest Regional Office
15700 Dayton Avenue N
Shoreline, Washington 98133-9716
Sent via email

Re: Quarterly Progress Report: First Quarter 2024
Carson Cleaners Site, Cleanup Site ID: 14878
Washington State Department of Ecology Agreed Order No. DE 19805

Dear Mr. Myers:

This Quarterly Progress Report is submitted on behalf of Tahn Associates, LLC, and summarizes the activities performed from January 1 through March 31, 2024, as required by the Washington State Department of Ecology (Ecology) Agreed Order (AO) No. DE 19805. This Quarterly Progress Report has been prepared in accordance with the requirements of the AO, Section VII.F, and describes the following:

1. Actions that have been taken to comply with the AO
2. Sampling and testing reports and other data reports received by the Potentially Liable Party
3. Deviations from approved work plans
4. Contacts with representatives of the local community; public interest groups; the press; and federal, state, and tribal governments
5. Problems or anticipated problems in meeting the schedule or objectives set forth in the scope of work and work plans
6. Solutions developed and implemented or planned to address any actual or anticipated problems or delays
7. Changes in key personnel
8. Work planned for the next reporting period

Actions During First Quarter 2024

Actions Performed

- No field work was conducted during the first quarter 2024.
- Fourth Quarter 2023 Progress Report was submitted to Ecology on January 16, 2024.
- Coordination with Exxon Mobil at the neighboring Former BP Brooklyn Site to initiate the transfer of ownership of four groundwater monitoring wells (BP-MW8, BP-MW27, BP-MW28, BP-MW29) owned by Exxon Mobil. A No Further Action Letter has been issued for the

Former BP Brooklyn site and they will be decommissioning wells that are no longer needed. In order to maintain the wells for sampling and monitoring of the chlorinated solvent plume, the transfer of ownership of these four wells from Exxon Mobil to Tahn Associates is underway.

Sampling and Testing Reports

There are no sampling and testing reports in this reporting period.

Deviations from Approved Work Plans

There were no deviations from approved work plans.

Contacts with Local, State, Federal, or Tribal Representatives

A videoconference was held with Ecology on February 5, 2024, to present the preliminary remedial investigation results, remaining data gaps, and next step recommendations. The next-step recommendations presented include the following:

- Collection of additional groundwater samples for laboratory analysis of monitored natural attenuation (MNA) parameters, volatile organic compounds (VOCs) and petroleum constituents, and isotopic forensics.
- Developing an amended Remedial Investigation Work Plan (RIWP) in support of the additional groundwater sample collection.
- Developing an amended Sampling and Analysis Plan (SAP) in support of the additional groundwater sample collection.

Anchor QEA received an email from Ecology on March 14, 2024, in response to Anchor's proposed additional remedial investigation work. Ecology agrees that there is currently insufficient evidence to draw conclusions about the underlying plume(s) and that it is reasonable to collect additional geochemical data to characterize the Site. Ecology approved Anchor QEA to develop an amended RIWP and an amended SAP for review and approval of the collection of additional groundwater samples analyzing for MNA parameters, VOCs and petroleum constituents, and isotopic forensics.

Summary of Problems

Problems Encountered

There were no problems encountered during this reporting period.

Changes in Key Personnel

There were no changes in Key Personnel from the previous reporting period.

Second Quarter 2024 Planned Work

- Develop RIWP and SAP Amendments for additional sampling, to be submitted to Ecology for review and approval, per the revised Overall Project Schedule (Attachment 1).

If you have any questions about the Quarterly Progress Report, please call me at (206) 903-3303 or (206) 462-9572.

Best regards,

A handwritten signature in black ink, appearing to read "Nathan Soccorsy". The signature is fluid and cursive, with the first name being more prominent.

Nathan Soccorsy
Principal Scientist, Anchor QEA

cc: Halah Voges and Gavin Casson, Anchor QEA

Attachment 1
Overall Project Schedule

| Task | 2024 | | | | | | | | |
|--|-------|-----|------|------|--------|-----------|---------|----------|----------|
| | April | May | June | July | August | September | October | November | December |
| Additional Remedial Investigation | | | | | | | | | |
| Draft RI WP Amendment | | | | | | | | | |
| Ecology Review Draft RI WP Amendment | | | | | | | | | |
| Final RI WP Amendment | | | | | | | | | |
| Additional Remedial Field Investigations | | | | | | | | | |
| Validated Data and EIM Upload | | | | | | | | | |
| Remedial Investigation Report | | | | | | | | | |
| Draft RI Report | | | | | | | | | |
| Ecology Review Draft RI Report | | | | | | | | | |
| Address Ecology RI Report Comments | | | | | | | | | |
| Final RI Report | | | | | | | | | |
| Feasibility Study Report | | | | | | | | | |
| Draft FS Report | | | | | | | | | |
| SEPA Compliance Checklist | | | | | | | | | |
| Ecology Review of Draft FS Report | | | | | | | | | |
| Address Ecology FS Report Comments | | | | | | | | | |
| Final FS Report | | | | | | | | | |
| Public Participation | | | | | | | | | |
| Drafting of Public Participation Plan | | | | | | | | | |
| Public Review and Comment Period | | | | | | | | | |
| Draft Responsiveness Summary | | | | | | | | | |
| Ecology Review and Approval of Final Documents | | | | | | | | | |
| Draft Cleanup Action Plan | | | | | | | | | |
| 11. Agency Review preliminary DCAP | | | | | | | | | |

Attachment 1
Overall Project Schedule

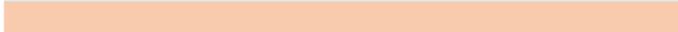
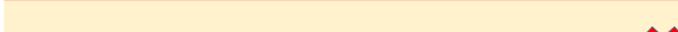
| Task | 2025 | | | | | | | | | | | |
|--|---------|----------|-------|-------|-----|------|------|--------|-----------|---------|----------|----------|
| | January | February | March | April | May | June | July | August | September | October | November | December |
| Additional Remedial Investigation | | | | | | | | | | | | |
| Draft RI WP Amendment | | | | | | | | | | | | |
| Ecology Review Draft RI WP Amendment | | | | | | | | | | | | |
| Final RI WP Amendment | | | | | | | | | | | | |
| Additional Remedial Field Investigations | | | | | | | | | | | | |
| Validated Data and EIM Upload | | | | | | | | | | | | |
| Remedial Investigation Report | | | | | | | | | | | | |
| Draft RI Report | | ✘ | | | | | | | | | | |
| Ecology Review Draft RI Report | | | | | | | | | | | | |
| Address Ecology RI Report Comments | | | | ✘ | | | | | | | | |
| Final RI Report | | | | | | | | | ✘ | | | |
| Feasibility Study Report | | | | | | | | | | | | |
| Draft FS Report | | | | | | | | ✘ | | | | |
| SEPA Compliance Checklist | | | | | | | | | | | | |
| Ecology Review of Draft FS Report | | | | | | | | | | | | |
| Address Ecology FS Report Comments | | | | | | | ✘ | | | | | |
| Final FS Report | | | | | | | | | ✘ | | | |
| Public Participation | | | | | | | | | | | | |
| Drafting of Public Participation Plan | | | | | | | | | | | | |
| Public Review and Comment Period | | | | | | | | | | | | |
| Draft Responsiveness Summary | | | | | | | | | ✘ | | | |
| Ecology Review and Approval of Final Documents | | | | | | | | | | | | |
| Draft Cleanup Action Plan | | | | | | | | | | | | |
| 11. Agency Review preliminary DCAP | | | | | | | | | | | | |

Attachment 1
Overall Project Schedule

| Task | 2026 | | | | | | | | | | | |
|--|---------|----------|-------|-------|-----|------|------|--------|-----------|---------|----------|----------|
| | January | February | March | April | May | June | July | August | September | October | November | December |
| Additional Remedial Investigation | | | | | | | | | | | | |
| Draft RI WP Amendment | | | | | | | | | | | | |
| Ecology Review Draft RI WP Amendment | | | | | | | | | | | | |
| Final RI WP Amendment | | | | | | | | | | | | |
| Additional Remedial Field Investigations | | | | | | | | | | | | |
| Validated Data and EIM Upload | | | | | | | | | | | | |
| Remedial Investigation Report | | | | | | | | | | | | |
| Draft RI Report | | | | | | | | | | | | |
| Ecology Review Draft RI Report | | | | | | | | | | | | |
| Address Ecology RI Report Comments | | | | | | | | | | | | |
| Final RI Report | | | | | | | | | | | | |
| Feasibility Study Report | | | | | | | | | | | | |
| Draft FS Report | | | | | | | | | | | | |
| SEPA Compliance Checklist | | | | | | | | | | | | |
| Ecology Review of Draft FS Report | | | | | | | | | | | | |
| Address Ecology FS Report Comments | | | | | | | | | | | | |
| Final FS Report | | | | | | | | | | | | |
| Public Participation | | | | | | | | | | | | |
| Drafting of Public Participation Plan | | | | | | | | | | | | |
| Public Review and Comment Period | | | | | | | | | | | | |
| Draft Responsiveness Summary | | | | | | | | | | | | |
| Ecology Review and Approval of Final Documents | | | | | | | | | | | | |
| Draft Cleanup Action Plan | | | | | | | | | | | | |
| 11. Agency Review preliminary DCAP | | ✘ | | | | | | | | | | |

Attachment 1
Overall Project Schedule

Notes

| | |
|---|--|
|  | Anchor QEA work periods |
|  | Assumed Ecology Review or Approval Periods |
|  | Assumed Public Review Periods |
|  | Due Date per Agreed Order |

dCAP: Draft Cleanup Action Plan
EIM: Environmental Information Management
FS: Feasibility Study
SAP: Sampling Analysis Plan
QAPP: Quality Assurance
RI: Remedial Investigation
WP: Work Plan