

Quarterly Progress Report

To: Garin Schrieve, PE, Washington State Department of Ecology

From: Nicole LaFranchise and Kendra Skellenger, PE, Anchor QEA, LLC

cc: Kristin Gaines, Millennium Bulk Terminals – Longview, LLC, and Michele Maidman, Northwest Alloys, Inc.

Re: Former Reynolds Metals Remediation – Quarterly Progress Report, 2019 Q4

Per Section XI of the Consent Decree (CD) issued by the State of Washington Cowlitz County Superior Court on December 14, 2018, Anchor QEA, LLC, is providing the following quarterly progress report on behalf of Millennium Bulk Terminals – Longview, LLC (MBTL), and Northwest Alloys, Inc. This quarterly progress report describes the actions taken during the previous quarter (between October 1 and December 31, 2019) to implement the requirements of the CD.

A. List of on-site activities that have taken place during the quarter

- A revised interim groundwater and surface water monitoring program (Interim Program) was submitted to the Washington State Department of Ecology (Ecology) on October 3, 2019. Ecology approved the Interim Program on October 8, 2019. The first sampling (4th quarter) event under the Interim Program occurred October 29 through 31, 2019. The annual report is being prepared for submittal to Ecology by March 1, 2020.
- The Total Petroleum Hydrocarbon (TPH) Area/Site Unit 13 (SU-13) soil removal activities took place on October 2, 2019, with a second mobilization on October 15, 2019. An SU-13 completion report was submitted to Ecology on December 12, 2019, and Ecology approved the SU-13 completion report on December 17, 2019.
- Column testing for the treatability studies to inform permeable reactive barrier and reactive backfill media selection and design have been completed, and data analysis of the results is underway. Column tests included the following three set-ups: 1) activated alumina; 2) bone char followed by activated alumina; and 3) bone char followed by calcite.

B. Detailed description of any deviations from required tasks not otherwise documented in project plans or amendment requests

None.

C. Description of all deviations from the Scope of Work and Schedule (Exhibit C) during the current quarter and any planned deviations in the upcoming quarter

No deviations occurred during the reporting quarter, and no deviations are planned for the upcoming quarter.

D. For any deviations in schedule, a plan for recovering lost time and maintaining compliance with the schedule

MBTL and Northwest Alloys are continuing to await U.S. Army Corps of Engineers (USACE) authorization for pre-remedial design investigation (PDI) in the levee right-of-way, at which time Ecology will be notified. USACE is currently determining if the proposed PDI geotechnical sampling requires a full Section 408 review. USACE is also in the process of selecting a new lead for the Section 408 group. The PDI has tentatively been scheduled for the third week in March.

E. Summary of all environmental data received by Owner and Operator during the past quarter

Environmental data were received by MBTL and Northwest Alloys during the past quarter for the TPH/SU-13 soil removal activities and were included in the SU-13 completion report that was submitted to Ecology on December 12, 2019. Data were also received for the 4th quarter Interim Program monitoring. Those data will be reported in the 2019 annual groundwater report.

F. (At Ecology's request) All raw data, including laboratory analyses and an identification of the source of the sample

No data were requested.

G. List of deliverables for the upcoming quarter, if different from the schedule

There are no changes to the CD Scope of Work schedule.

H. References

There are no applicable references.