

Quarterly Progress Report

October 18, 2019

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 Q3

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 July 1 and September 30, 2019) to implement the requirements of the CD.

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

- An interim groundwater and surface water monitoring program (Interim Program) was submitted to the Washington State Department of Ecology (Ecology) on July 31, 2019. Ecology provided comments on the Interim Program on August 2, 2019. A meeting to discuss Ecology's comments on the Interim Program was held at the site on August 20, 2019, with Ecology, MBTL, Northwest Alloys, and Anchor QEA. The revised Interim Program incorporating Ecology's comments will be submitted to Ecology in October 2019.
- Bidding for the Total Petroleum Hydrocarbon (TPH) Area/Site Unit 13 (SU-13) remediation took place in August 2019, and a contractor was selected in September 2019. The work is scheduled for October 2, 2019. A completion report will be submitted to Ecology by December 14, 2019.
- Treatability studies to inform permeable reactive barrier and reactive backfill media selection and design are ongoing. Kinetic and isotherm batch testing is complete, and column testing is underway.

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.

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

No environmental data related to the CD were received by the Owner and Operator during the past quarter.

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.