



June 15, 2020

Dale Myers
Washington State Department of Ecology
3190 160th Avenue Southeast
Bellevue, Washington

Re: Progress Report, SKS Shell Station Site, First Quarter 2020

LMI – West Seattle Holdings, LLC PPCD No. 13-3-27556-2

Facility ID #39196282, Cleanup ID #6015

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 is being completed 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. Detailed description of any deviations from required tasks not otherwise documented in project plans or amendment requests;
- C. 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; and
- F. A list of deliverables for the upcoming month if different from the schedule.

The following describes the actions taken during the First Quarter of 2020 to implement the requirements of the PPCD:



A. List of On-Site Activities and Progress During First Quarter 2020

- Aspect understands that SoundEarth Strategies completed well decommissioning of MW103 in the Fauntleroy Way Southwest right-of-way (ROW) on April 6, 2020.

B. Deviations from Required Tasks Not Otherwise Documented

- Deviations to the required tasks for First Quarter 2020 were documented in the “Request For Extension” letter delivered to Ecology on March 31, 2020, and approved by Ecology via email dated April 6, 2020, including:
 - Schedule extension for completing the First Quarter 2020 groundwater monitoring event. This event occurred on April 21 and 22, 2020, and a summary report is in progress.
 - Schedule extension for preparation and execution of a work plan for contingent chemical oxidation injections in the Fauntleroy Way ROW. Data acquisition and review of this remedial option is in progress.
 - Schedule extension for preparation and execution of a work plan for the installation of monitoring well MW114 in the Southwest Alaska Street ROW. Data acquisition and review of this well is in progress.

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

- The deadline for First Quarter 2020 groundwater monitoring event was extended to April 2020, as approved by Ecology via email on April 6, 2020. The event was conducted on April 21 to 22, 2020, and a summary report is in progress. No further deviation from the schedule will be required; the Second Quarter 2020 groundwater monitoring event will occur in June 2020 as planned and will not impact other deadlines.
- The findings of our data review related to chemical oxidation injections will be provided for Ecology review in Second Quarter 2020.
- The findings of our data review related to the proposed MW114 well installation will be provided for Ecology review in Second Quarter 2020.

E. Raw Data Received from the Laboratory

- Chemical analytical data for the First Quarter 2020 groundwater monitoring event that occurred on April 21 to 22, 2020, will be provided following data validation and completion of our summary report.

F. List of Deliverables and Key Activities for Upcoming Quarter

- Technical memoranda related to *in-situ* chemical oxidation and proposed MW114 well installation will be provided to facilitate conversations with Ecology related to efficacy and necessity of these actions.
- Work Plans, if needed, will be presented, pending discussions with Ecology, on scope and applicability of chemical oxidation injections and installation of proposed well MW114.

- The Second Quarter 2020 groundwater monitoring event will occur in June 2020.

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–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
Quarterly Groundwater Monitoring	Ongoing: 2020–2021

¹ Schedule elements prior to the date of this progress report are as reported in SoundEarth Strategies’ “Fourth Quarter 2019 Progress Report” dated January 27, 2020.

LMI – West Seattle Holdings, LLC
June 15, 2020

Project No. 160328

Sincerely,

Aspect consulting, LLC

A handwritten signature in blue ink, appearing to read 'Ali Cochrane', with a long horizontal line extending to the right.

Ali Cochrane, LG
Senior Geologist
acochrane@aspectconsulting.com

A handwritten signature in blue ink, appearing to read 'Dave Cook', with a large initial 'D' and a long horizontal line extending to the right.

Dave Cook, LG, CPG
Principal Geologist
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cc: Phil Carmody, GID
Jason Sweatt, GID
Elton Lee, GID
Bill Joyce and Stephanie Weir, Joyce Ziker Partners, PLLC

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