

April 16, 2020

Mr. Ron Timm
Washington State Department of Ecology
Northwest Regional Office
3190 160th Avenue Southeast
Bellevue, Washington 98008-5452

**RE: PROGRESS REPORT FOR FIRST QUARTER 2020
BNSF FORMER MAINTENANCE AND FUELING FACILITY
SKYKOMISH, WASHINGTON
CONSENT DECREE NO. 07-2-33672-9 SEA
FARALLON PN: 683-067**

Dear Mr. Timm:

Farallon Consulting, L.L.C. (Farallon) has prepared this quarterly progress report on behalf of BNSF Railway Company (BNSF) to document the activities conducted from January through March 2020 at the BNSF Former Maintenance and Fueling Facility in Skykomish, Washington (herein referred to as the Site). This quarterly progress report was prepared in accordance with the requirements of Section XI of Consent Decree No. 07-2-33672-9 SEA (Consent Decree) dated October 19, 2007 between the Washington State Department of Ecology (Ecology) and BNSF.

This quarterly progress report covers the period from January 1 through March 31, 2020 for the cleanup actions being conducted at the Site, and includes:

- A summary of on-Site activities conducted during the quarterly reporting period;
- A summary of the status of raw data (including laboratory analyses) received by BNSF during the quarterly reporting period and identification of the source of the samples;
- A summary of deviations from tasks required by the Consent Decree not otherwise documented in project plans or amendment requests;
- A description of deviations from the Cleanup Action Plan and the schedule contained therein during the quarterly reporting period, and any planned deviations in the upcoming quarter;
- If deviations in the schedule are reported, a plan for recovering lost time and maintaining compliance with the schedule; and
- A list of deliverables for the upcoming quarterly reporting period.

ON-SITE ACTIVITIES

The following activities were conducted at the Site.



January 2020

- No activities were conducted at the Site.

February 2020

- Hydraulic Control and Containment (HCC) system performance groundwater monitoring event conducted on February 19, 2020; and
- HCC operation and maintenance and National Pollutant Discharge Elimination System (NPDES) Permit compliance sampling conducted on February 21, 2020.

March 2020

- Site-wide liquid-level gauging and groundwater sampling conducted from March 16 to 19, 2020; and
- Skykomish School post-treatment confirmational monitoring conducted on March 16, 2020.

RAW DATA

Laboratory analytical data from the following sampling activities were independently validated by Saylor Data Solutions, Inc. of Kirkland, Washington: February 2020 HCC system and NPDES Permit compliance sampling event; February 2020 HCC performance groundwater monitoring event; and March 2020 groundwater monitoring event.

Analytical data from the following sampling activities were entered into the project-specific database: February 2020 HCC system and NPDES Permit compliance sampling event; February 2020 HCC performance groundwater monitoring event; March 2020 groundwater monitoring event; and March 2020 indoor air monitoring (part of Skykomish School post-treatment confirmational monitoring).

DEVIATIONS AND CORRECTIONS

In an email dated January 24, 2020, Ecology approved the ongoing passive operation of the HCC system through June 2020. Performance monitoring of the HCC system is conducted bimonthly and includes the following work elements:

- Groundwater sampling and liquid-level gauging at the monitoring locations sampled during the pilot study, including sampling and inspection of the west and east vault oil-water separator chambers of the West Gate and the Far West Gate; and
- Operating the recovery well pumps and groundwater treatment system as necessary every 2 months for approximately 4 hours to ensure all components of the redundant HCC system can be activated to reverse the hydraulic gradient across the West Gate, if needed.



DELIVERABLES

The following deliverables were submitted to Ecology:

- NPDES Discharge Monitoring Reports for December 2019, and January and February 2020, submitted through Ecology's web portal on January 22, February 21, and March 20, 2020, respectively;
- Progress Report for Fourth Quarter 2019, submitted on January 10, 2020;
- Draft 2019 Annual Hydraulic Control and Containment System Operations Report, submitted on March 25, 2020; and
- Draft 2019 Site-Wide Groundwater Monitoring Report, submitted on March 26, 2020.

DOCUMENTS PENDING AGENCY REVIEW

The following documents have been submitted as drafts and are pending Ecology review:

- Draft Long-Term Monitoring Plan, submitted on November 26, 2019;
- Draft 2019 Annual Hydraulic Control and Containment System Operations Report, submitted on March 25, 2020; and
- Draft 2019 Site-Wide Groundwater Monitoring Report, submitted on March 26, 2020.

TECHNICAL AND REGULATORY MEETINGS

Representatives from BNSF, Farallon, and Ecology met on January 14, 2020 to discuss the results of the HCC system passive operation pilot study.

SECOND QUARTER 2020 ACTIVITIES, MEETINGS, AND DELIVERABLES

Activities

The following activities are scheduled for the Site in the second quarter of 2020:

- NPDES compliance sampling is scheduled for April, May, and June 2020 if discharge occurs;
- HCC system performance groundwater monitoring is scheduled for April and June 2020;
- Quarterly groundwater monitoring is scheduled for June 2020; and
- Skykomish School post-treatment confirmational monitoring is scheduled for June 2020.

Meetings

No meetings currently are scheduled for the second quarter of 2020.

Deliverables

The March, April, and May 2020 NPDES Discharge Monitoring Reports will be submitted through Ecology's web portal by April 28, May 28, and June 28, 2020, respectively.



The Pilot Study Technical Memorandum will be submitted to Ecology in May 2020.

CLOSING

Please contact either of the undersigned at (425) 295-0800 if you have questions regarding this progress report or the project.

Sincerely,

Farallon Consulting, L.L.C.

Pete Kingston, L.G.
Senior Geologist

Amy Essig Desai
Principal Scientist

cc: Shane DeGross, BNSF
Brad Petrovich and Jeanne Tran, Ecology
Gary West and Teddy Jo Ryder, Skykomish Residents
Henry Sladek, Town of Skykomish
David Carson, Carson Law Group P.S.
Thomas Jay and Kimberly McCullough, Skykomish School District
John Robinson, U.S. Forest Service
Larry Johnson, FiberStory

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