

July 16, 2020

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

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

Dear Messrs. Timm and Bushnell:

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 April through June 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 April 1 through June 30, 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.



April 2020

- Vegetation and biological monitoring conducted in the Former Maloney Creek West Wetland Area (FMC West Wetland) on April 22, 2020;
- Hydraulic Control and Containment (HCC) system performance groundwater monitoring event conducted on April 22, 2020; and
- HCC operation and maintenance and National Pollutant Discharge Elimination System (NPDES) Permit compliance sampling conducted on April 23, 2020.

May 2020

- No activities were conducted at the Site.

June 2020

- Vegetation maintenance conducted in the FMC West Wetland on June 6, 2020;
- Vegetation and biological monitoring conducted in the FMC West Wetland on June 23, 2020;
- Skykomish School post-treatment confirmational monitoring conducted on June 23, 2020;
- HCC system performance groundwater monitoring event conducted on June 23, 2020;
- Site-wide liquid-level gauging and groundwater sampling conducted on June 23 and 24, 2020; and
- HCC operation and maintenance and NPDES Permit compliance sampling conducted on June 26, 2020.

RAW DATA

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

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

DEVIATIONS AND CORRECTIONS

In an email dated June 25, 2020, Ecology approved the ongoing passive operation of the HCC system through December 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 March, April, and May 2020, submitted through Ecology's web portal on April 22, May 22, and July 1, 2020, respectively;
- Progress Report for First Quarter 2020, submitted on April 16, 2020;
- Final 2019 Annual Hydraulic Control and Containment System Operations Report, submitted on May 19, 2020;
- Final 2019 Site-Wide Groundwater Monitoring Report, submitted on May 19, 2020; and
- Draft HCC System Passive Operations Pilot Study Report, submitted on June 11, 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; and
- Draft HCC System Passive Operations Pilot Study Report, submitted on June 11, 2020.

TECHNICAL AND REGULATORY MEETINGS

Representatives from BNSF, Farallon, and Ecology met on May 28 and June 15, 2020 to discuss the results of the HCC system passive operation pilot study and the project transition to a new Ecology site manager.

THIRD QUARTER 2020 ACTIVITIES, MEETINGS, AND DELIVERABLES

Activities

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

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



Meetings

A progress meeting with representatives from BNSF, Farallon, and Ecology will be conducted on July 20, 2020.

Deliverables

The June, July, and August 2020 NPDES Discharge Monitoring Reports will be submitted through Ecology's web portal by July 28, August 28, and September 28, 2020, respectively.

An Engineering Design Report, which will detail the proposed installation and operation of the biosparge system, will be submitted to Ecology.

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

PJK/AED:cm