

October 12, 2020

Mr. Tanner Bushnell  
Washington State Department of Ecology  
Northwest Regional Office  
3190 160<sup>th</sup> Avenue Southeast  
Bellevue, Washington 98008-5452

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

Dear Mr. 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 July through September 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 July 1 through September 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.



### **July 2020**

- Vegetation and biological monitoring were conducted in the Former Maloney Creek West Wetland Area (FMC West Wetland) on July 22, 2020; and
- Vegetation maintenance were conducted in the FMC West Wetland on July 22, 2020.

### **August 2020**

- Hydraulic Control and Containment (HCC) system performance groundwater monitoring event was conducted on August 25, 2020;
- HCC operation and maintenance and National Pollutant Discharge Elimination System (NPDES) Permit compliance sampling was conducted on August 29, 2020; and
- Vegetation and biological monitoring was conducted in the FMC West Wetland on August 30, 2020.

### **September 2020**

- Site-wide liquid-level gauging and groundwater sampling was conducted on September 15 and 16, 2020; and
- Skykomish School post-treatment confirmational monitoring was conducted on September 16, 2020.

### **RAW DATA**

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

Analytical data from the following sampling activities were entered into the project-specific database: August 2020 HCC system and NPDES Permit compliance sampling events and August 2020 HCC performance groundwater monitoring events.

### **DEVIATIONS AND CORRECTIONS**

In an email dated September 15, 2020, Ecology conditionally approved the Revised Draft Long-Term Monitoring Plan (LTMP) given the inclusion of sampling of monitoring wells 1C-W-4, 1C-W-7, 2A-W-9, and MW-4 in addition to the wells to be sampled that were listed in the LTMP submitted to Ecology on August 28, 2020.

The September groundwater monitoring event was conducted in accordance with the conditionally approved LTMP.



## **DELIVERABLES**

The following deliverables were submitted to Ecology:

- NPDES Discharge Monitoring Reports for June, July, and August 2020, submitted through Ecology's web portal on July 22, August 24, and September 23, 2020, respectively;
- Progress Report for Second Quarter 2020, submitted on July 16, 2020; and
- Revised Draft Long-Term Monitoring Plan, submitted on August 28, 2020.

## **DOCUMENTS PENDING AGENCY REVIEW**

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

- Draft HCC System Passive Operations Pilot Study Report, submitted on June 11, 2020.

## **TECHNICAL AND REGULATORY MEETINGS**

Representatives from BNSF, Farallon, and Ecology had a conference call on August 25, 2020 to discuss the status of the LTMP and discuss the forthcoming Biosparge Pilot Study and Engineering Design Work Plan.

## **FOURTH QUARTER 2020 ACTIVITIES, MEETINGS, AND DELIVERABLES**

### **Activities**

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

- NPDES compliance sampling is scheduled for October, November, and December 2020 if discharge occurs;
- HCC system performance groundwater monitoring is scheduled for October and December 2020;
- The biosparge pilot study system installation and startup is tentatively scheduled for November 2020; and
- Biosparge pilot study groundwater monitoring is scheduled for December 2020.

### **Meetings**

There are no meetings currently scheduled for the fourth quarter of 2020.

### **Deliverables**

The September, October, and November 2020 NPDES Discharge Monitoring Reports will be submitted through Ecology's web portal by October 28, November 28, and December 28, 2020, respectively.

A Biosparge Pilot Study and Engineering Design Work Plan, which will detail the installation and operation of the biosparge system, will be submitted to Ecology in October 2020.



The Final LTMP incorporating Ecology's September 15, 2020 comments will be submitted to Ecology in October 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.**

Amanda Meugniot, L.G.  
Associate 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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