

**SECOND QUARTER 2016 PROGRESS REPORT / FIRST QUARTER 2016
GROUNDWATER PERFORMANCE MONITORING REPORT
BP WEST COAST PRODUCTS TERMINAL, HARBOR ISLAND
1652 SW LANDER STREET
SEATTLE, WASHINGTON**

CONSENT DECREE NO. 00-2-05714-8SEA

JULY 2016

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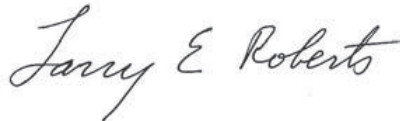
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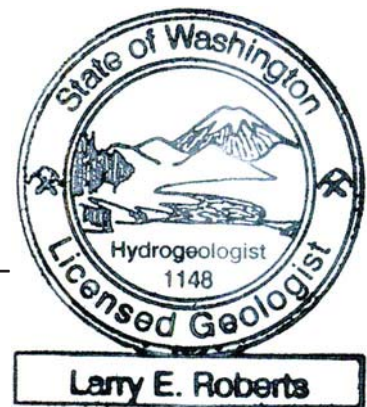


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1. INTRODUCTION

Atlantic Richfield Company is submitting this report prepared by TechSolve Environmental, Inc. (TechSolve) to summarize the First Quarter 2016 Groundwater Monitoring event and operation and maintenance of the waterfront remediation system through the second quarter (June) of 2016 for the BP West Coast Products Terminal (formerly known as the ARCO Terminal 21T). Groundwater monitoring and remediation system reporting periods are staggered due to the time required to receive and validate laboratory reports from groundwater monitoring events. The combination of these two summary reports was based upon the recommendation of the Washington State Department of Ecology (Ecology) project manager (Ecology, 2004a). This progress report satisfies reporting schedule submittal requirements pursuant to Ecology Consent Decree No. 00-2-05714-8SEA, entered into court March 24, 2000 (Ecology, 2000b).

2. REMEDIATION SYSTEM OPERATIONS

Remediation systems were installed and completed at the Site in accordance with specifications outlined in the Engineering Design Report (EDR) (TechSolv and AG&M, 2000) and Cleanup Action Plan (CAP) (Ecology, 1999). During the first six months of 2016 a waterfront groundwater/Light Non-Aqueous Phase Liquid (LNAPL) remediation system operated to remove free-phase LNAPL and dissolved petroleum hydrocarbons from groundwater at Plant 1 (Figure 1).

2.1. WATERFRONT SYSTEM OPERATIONS

Installation and startup of the final waterfront remediation system was completed in 2002 and operational testing was conducted through 2003. Standard operation began once testing showed the system operated as designed and in accordance with Consent Decree and EDR requirements. Reports submitted to Ecology summarized both construction and operation & maintenance (O&M) of the remediation system. The Construction Completion Report (CCR) (TechSolve, 2003b) summarized construction, installation, and startup testing of the final remediation system, and documented that systems met design criteria, attained desired capture, and hydraulic control along the waterfront. The Final O&M Manual (TechSolve, 2003c) contains procedures to operate and maintain systems, vendor-supplied manuals for components, and health and safety practices. Ecology stated that the CCR and O&M Manual complied with the requirements of the Consent Decree, the Groundwater Compliance Monitoring Program, and the Model Toxics Control Act (WAC 173-340-400) and, as such, were approved (Ecology, 2004b). The O&M Manual is updated as practices or procedures change, or as systems are altered.

O&M activities are conducted on systems weekly to ensure they operate as designed and in accordance with applicable permits. These activities include, but are not limited to:

- Weekly checks of groundwater recovery system pumping rates.
- Weekly inspections of system components and waste storage containers for integrity per the requirements of WAC 173-303-320.
- Monthly sampling of recovered groundwater influent and effluent streams to ensure compliance with King County Department of Natural Resources and Parks (KCDNR) Discharge Permit 7592-05 for discharge A43262.

- Monthly monitoring and calculation of system LNAPL recovery.
- Monthly sampling of system flow rates and hydrocarbon concentrations.

Additional maintenance activities are conducted as needed to maintain system operational integrity and to ensure discharges are within permitted ranges.

Operation of waterfront air sparging and SVE systems were discontinued in May 2008, as the bulk of available hydrocarbons had been recovered. System data collected during 5 years of operation prior to shutdown were presented in previous reports, and support system shutdown. These findings were presented to Ecology in a 5-year Review meeting, conducted October 8, 2008, and summarized in the 2008 Annual Site Report (TechSolve, 2009).

Combined LNAPL recovery (free-phase, residual, and dissolved) from final SVE and groundwater and LNAPL recovery systems is approximately 14,542 gallons (October 2002 to June 2016) (Table 1). Interim systems, operating from 1992 through 2002, recovered an additional 15,223 gallons of LNAPL, for a combined LNAPL recovery from interim and final remediation systems of 29,766 gallons. The majority of LNAPL recovered by interim remediation systems was free-phase LNAPL. The majority of LNAPL recovered by final remediation systems was from enhanced biodegradation, calculated from SVE vapor sampling for CO₂. SVE system shutdown in 2008 was based, in part, on concentrations of CO₂ reaching atmospheric (background) levels.

Groundwater/LNAPL recovery system data in Table 1 show influent concentrations of dissolved benzene, diesel, and gasoline in recovered groundwater fluctuate slightly throughout the year but have decreased over time. Table 1 also shows that measurable volumes of free LNAPL have not been generated since 2008, which was the last time sufficient quantities of LNAPL were recovered to warrant off-site shipment. This data corresponds with the lack of free LNAPL observed in recovery wells utilized by the groundwater/LNAPL recovery system. Lack of free LNAPL in wells and limited free LNAPL recovery by the groundwater/LNAPL recovery system indicates that the recovery system has captured most available free LNAPL.

Effluent discharges from the groundwater/LNAPL recovery system to sanitary have been within KCDNR's permitted ranges (Table 1) in 2016 and system recovery rates have been effective in preventing sheens from occurring on the adjacent Duwamish Waterway. Average monthly effluent flow rates ranged from 2.49 to 1.52 gallons per minute (gpm) in 2016, below KCDNR's maximum permitted flow of 17.5 gpm, consistent with past rates.

Reductions in dissolved hydrocarbon concentrations through a diffused air stripper (DAS) (Table 1) show it effectively treats recovered groundwater and meets permit requirements. DAS Influent concentrations of dissolved hydrocarbons continue to be below permitted effluent discharge levels, indicating DAS operation is not necessary to achieve permit compliance. However, the DAS continues to operate, as influent concentrations of dissolved hydrocarbons vary over time and concentrations in individual recovery wells exceed permitted discharge levels at times.

Maintenance and repair activities of remediation systems are conducted to maintain effective operation and system capture and hydraulic control along the waterfront. Notable activities conducted to date in 2016 include:

- Conveyance piping line snaking and jetting to remove scale and biofouling.
- Annual corrosion inspection of conveyance piping by corrosion engineer to verify integrity.
- Jetting of recovery wells' screened intervals to remove scale and biofouling.

Well jetting and well rehabilitation items listed above are conducted to enhance production of recovery wells. Pumping rates from individual recovery wells are evaluated and well rehabilitation actions are conducted as necessary to maintain effective capture. Data show that the system continues to operate as designed and in accordance with permit requirements.

2.2. INLAND SYSTEM OPERATIONS

An Inland SVE system operated to improve soil and groundwater conditions along the southern boundary of Plant 1. Past investigations and monitoring near the southern property boundary (Figure 1) showed petroleum hydrocarbons in soil and groundwater exceeded site cleanup levels and, mainly located in the vadose zone (unsaturated soils and capillary fringe).

SVE system designs, similar to the Waterfront SVE system, were submitted to and approved by Ecology in 2007 (TechSolve, 2007 & Ecology, 2007). SVE subsurface components were installed in October 2007. SVE equipment and catalytic oxidation (CATOX) vapor treatment were specified based on pilot testing and installed in August 2008. SVE air discharges were approved under Puget Sound Clean Air Agency (PSCAA) Notice of Construction (NoC) No. 9858.

Data from SVE startup in August 2008 through shutdown in December 2014 show the system captured approximately 7,940 pounds (1,291 gallons) of gasoline range hydrocarbons. Induced airflow from SVE operation also enhanced biodegradation of residual hydrocarbons. Calculations estimate that an additional 4,355 gallons of gasoline-range hydrocarbons were reduced by biodegradation, for a combined (biodegradation and vapor) recovery of gasoline-range hydrocarbons of 5,646 gallons (TechSolve, 2016).

The SVE system is currently shutdown as recovery data indicates the system no longer recovers measurable concentrations of petroleum hydrocarbons and induced airflow is no longer affecting biodegradation. By January 2010, influent hydrocarbon concentrations recovered by the Inland SVE system were routinely below laboratory detection limits and below PSCAA treatment thresholds. By 2012 CO₂ levels had also fallen to background levels (atmospheric), indicating biodegradation rates had decreased as the bulk of available hydrocarbons in this area had been reduced or captured. Additional information regarding the shutdown of the Inland SVE system was provided in the 2015 Annual Site Report (TechSolve, 2016).

System checks are currently conducted to ensure that the system is maintained in an operational state in case site conditions change and future operation of the Inland SVE System is warranted.

Groundwater performance monitoring measures improvements in groundwater quality along Plant 1's southern boundary from operation of the Inland SVE system. Groundwater monitoring data collected following Inland SVE startup in 2008 indicate the system has improved groundwater conditions at the southern property boundary, as discussed in the following section.

3. SUMMARY OF GROUNDWATER PERFORMANCE MONITORING PROGRAM

The First Quarter 2016 Groundwater Monitoring Event represents the 65rd round of performance monitoring performed under the Consent Decree. Groundwater monitoring is conducted in accordance with requirements of the Consent Decree, CAP, and Groundwater Compliance Monitoring and Contingency Program (TechSolve, 1999). The Groundwater Compliance Monitoring and Contingency Program describes the monitoring well network, sampling frequency, and analytes. Some revisions to the monitoring plan were included in the EDR, per Ecology's approval. Additional revisions have been made with Ecology's approval based on on-going monitoring results. The current groundwater monitoring schedule is summarized in Table 3. Monitoring well locations are shown on Figure 2 for Plant 1 and Figure 3 for Plant 2.

Groundwater monitoring requirements were revised in 2002, with concurrence from Ecology, to exclude sampling Plant 2 Wells MW-18-1, MW-18-2A, GM-21S, and GM-22S (Ecology, 2002). In 2004, remaining Plant 2 Wells GM-19S, GM-19D, MW-03R, and GM-22S were also excluded (Ecology, 2004b). However, Well GM-19S continues to be monitored for benzene and gasoline, as GM-19S has historically contained gasoline range hydrocarbons above cleanup levels, which previous investigations attributed to an unidentified off-site source (TechSolve, 2003a).

In 2005, four wells (MW-1-T9, MW-2-T9, MW-3-T9, and MW-4-T9) were installed at the south end of Plant 1 (Figure 2) to evaluate trends in groundwater due to continuing detections of hydrocarbons above cleanup levels in Monitoring Well AR-03. These wells have been monitored quarterly since December 2005, which has helped evaluate the effectiveness of the Inland SVE system in meeting cleanup objectives in this area, as discussed in the previous section.

Wells GM-16S and GM-17S are hydraulically upgradient from Plant 1 and were removed from most of the monitoring program with approval from Ecology in March 2000 (Ecology, 2000a) as sufficient upgradient data had been collected from these wells. Semiannual monitoring for hydrocarbons was voluntarily reinitiated in these wells in September 2007, as requested by Ecology, to monitor for potential petroleum hydrocarbons migration onto the property from upgradient, off-site sources.

Well GM-14S was historically used to monitor for sheens on groundwater, as discussed below. As sheens are no longer detected in GM-14S, quarterly groundwater monitoring for indicator hazardous substances (IHSs) was initiated in this well in 2007.

Additional revisions to the groundwater monitoring program were approved by Ecology in 2009 (Ecology, 2009). Revisions affected monitoring frequencies and required analyses. The monitoring frequency from Wells GM-19S, 15S, 16S, and 17S was reduced from quarterly to semi-annually. The monitoring frequency from GM-19S was reduced based on consistent and stable benzene and gasoline monitoring results. The monitoring frequency from GM-15S, 16S, and 17S was reduced due to consistent monitoring data for total petroleum hydrocarbons (TPH) and benzene below cleanup levels. However, benzene detections above the site cleanup level in GM-15S in 2013 prompted the voluntary increase of sampling frequency from semi-annually back to quarterly to better evaluate benzene trends in this well, as discussed in previous reports (TechSolve, 2016). The voluntary monitoring frequency of sampling for carcinogenic polynuclear aromatic hydrocarbons (cPAHs) was set to an annual basis in waterfront wells (AMW-01 through AMW-05) as extensive historical sampling does not indicate any significant detection trends. Ecology agreed

that analysis for cPAHs from these wells is voluntary until cleanup objectives are met (Ecology, 2003). Sampling for cPAHs was last conducted in fourth quarter 2015 (TechSolve, 2016)

Wells monitored on a semi-annual basis are sampled in the first and third quarter, which typically correspond with seasonal groundwater highs and lows, respectively. Based upon these seasonal fluctuations in groundwater, wells GM-19S, 16S, and 17s were sampled in the first quarter of 2016. These wells will next be sampled in the third quarter of 2016.

The First Quarter 2016 Groundwater Monitoring event was conducted March 8th and 9th, 2016. First quarter 2016 groundwater elevations (Table 3) were higher overall than third and fourth quarter 2015 elevations. These data indicate that the seasonal groundwater high occurred in early 2016, rising from the previous seasonal low in September 2015. This groundwater elevation trend corresponds with historic trends, which show groundwater elevations rise to seasonal highs in the winter and spring and fall to seasonal lows in the summer and fall.

First Quarter 2016 Groundwater Monitoring Event samples were submitted to Test America Laboratories of Tacoma, Washington for laboratory analysis of IHSs identified in the CAP. The IHSs include TPH as gasoline (TPH-G), TPH as diesel (TPH-D), TPH as oil (TPH-O), and benzene.

Petroleum hydrocarbon monitoring results for the First Quarter 2016 Groundwater Monitoring Event are included in Table 4 and Figures 2 and 3. Detections of IHSs (benzene, TPH-G, TPH-D, or TPH-O) above or at cleanup levels was limited to TPH-G at the cleanup level in Well MW-1-T9. Data were within historical ranges and consistent with historical trends. Data trend evaluations will be presented in the next Annual Site Report, in accordance with Consent Decree requirements.

Three wells (GM-11S, GM-12S, and GM-13S) are examined monthly for the presence of free LNAPL and sheens. Laboratory analysis for IHSs will not be conducted on groundwater from these Wells until they are removed from the monthly LNAPL gauging program, as required by the Groundwater Compliance Monitoring and Contingency Program. Historically, gauging for free LNAPL was conducted at five wells; however, gauging of Wells GM-14S and MW-03R has been discontinued with concurrence from Ecology. LNAPL monitoring of Well MW-03R at Plant 2 was discontinued in 2004 (Ecology, 2004b), as Plant 2 monitoring has been mostly discontinued as discussed above. Monthly monitoring for LNAPL in Monitoring Well GM-14S at Plant 1 was discontinued in 2004, with concurrence from Ecology (Ecology, 2004c), and converted to a monitoring well in 2007, as it has been free of LNAPL since 1999.

No sheens have been detected in Wells GM-11S and GM-12S in 2016. A sheen was detected in Well GM-13S in one (April) of the six monthly 2016 sheen monitoring events. The results of LNAPL monitoring for 2016 are presented in Table 5.

4. SUMMARY OF DATA VALIDATION

Laboratory analytical results were reported with associated laboratory quality assurance/quality control data (QA/QC). Analytical reports were reviewed and data were validated. During this quarter, most data did not require qualification. Limited data were qualified with a J qualifier (an estimated value), with a UJ qualifier (not detected and approximate reporting limit), with a U qualifier (undetected at the reporting limit), or R (rejected). Rejected data were limited to Diesel

and Oil results from a field duplicate sample from Well AMW-01. Diesel and oil from the other field duplicate sample from Well AMW-01 were reported. A summary of the data qualified during validation, qualifiers assigned, and reasons for data qualification are provided in Table 6. All laboratory reports are retained at the TechSolve office.

5. SUMMARY

This progress report and groundwater monitoring report summarizes operation of remediation systems through the second quarter of 2016 (June 2016) and the First Quarter 2016 Groundwater Monitoring Event. In accordance with the Consent Decree, the Third Quarter 2016 Progress Report / Second Quarter 2016 Groundwater Monitoring Report will be the next report submitted to Ecology. This report will be submitted to Ecology by October 15, 2016 and will contain information on groundwater monitoring conducted during the second quarter of 2016 and discussions on ongoing site activities and remedial actions conducted in the third quarter of 2016. This report will include discussions of activities completed, discussions of data, data validation information, data tables, and laboratory analytical reports for wells in the monitoring well network.

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TABLES

Table 2. Groundwater Performance Monitoring Schedule
 BP West Coast Products Terminal 21T, Seattle, Washington

Analyses Conducted by Quarter				
Well	First Quarter	Second Quarter	Third Quarter	Fourth Quarter
Plant 1				
MW-1-T9	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O
MW-2-T9	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O
MW-3-T9	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O
MW-4-T9	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O
GM-14S	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O
GM-15S	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O
GM-17S	Benzene, TPH-G, TPH-D, TPH-O		Benzene, TPH-G, TPH-D, TPH-O	
GM-16S	Benzene, TPH-G, TPH-D, TPH-O		Benzene, TPH-G, TPH-D, TPH-O	
GM-24S	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O
AR-03	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O
AMW-01	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O, cPAHs
AMW-02	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O, cPAHs
AMW-03	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O, cPAHs
AMW-04	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O, cPAHs
AMW-05	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O	Benzene, TPH-G, TPH-D, TPH-O, cPAHs
Plant 2				
GM-19S	Benzene, TPH-G		Benzene, TPH-G	

Notes: Field Duplicate and QA/QC samples collected from wells highlighted in bold.
 TPH-G - Gasoline Range organics utilizing NWTPH-Gx method
 TPH-D - Diesel Range Organics utilizing NWTPH-Dx
 TPH-O - Extended Range Organics (Motor Oil) utilizing NWTPH-Dx
 Benzene is analyzed for utilizing EPA 8021 or 8260B.
 cPAHs - Carcinogenic Polycyclic Aromatic Hydrocarbons utilizing EPA 8270SIM
 Field Parameters (pH, Temperature, Conductivity, Turbidity, Water Level, & Product Level) are recorded from all wells sampled

Table 3. Groundwater Performance Monitoring Groundwater Elevations
 First Quarter 2016
 BP West Coast Products Terminal 21T , Seattle, Washington

Well	Date	TOC Elevation (ft msl)	Depth to Water (ft below TOC)	Groundwater Elevation (ft msl)
Plant 1				
GM-14S	3/9/2016	8.57	2.87	5.70
GM-15S	3/8/2016	8.92	3.99	4.93
GM-16S	3/9/2016	8.53	3.56	4.97
GM-17S	3/9/2016	9.19	3.31	5.88
GM-24S	3/9/2016	7.62	1.82	5.80
AR-03	3/8/2016	9.35	4.66	4.69
AMW-01	3/8/2016	8.88	6.83	2.05
AMW-02	3/8/2016	12.14	9.04	3.10
AMW-03	3/8/2016	12.07	8.39	3.68
AMW-04	3/8/2016	8.00	5.28	2.72
AMW-05	3/8/2016	8.14	5.89	2.25
MW-1-T9	3/9/2016	9.07	4.52	4.55
MW-2-T9	3/9/2016	9.23	4.26	4.97
MW-3-T9	3/9/2016	8.73	3.82	4.91
MW-4-T9	3/8/2016	10.65	6.08	4.57
Plant 2				
GM-19S	3/9/2016	7.68	1.26	6.42

ft Feet

msl Mean sea level

NA Not available. Well elevations have not been surveyed.

NM Not measured. Well was not gauged or sampled due to inaccessibility caused by the Island redevelopment activities.

TOC Top of casing

Elevations measurements are calculated using NGVD29 Datum.

Table 4. Summary of Analytical Results for Groundwater - TPH-G, TPH-D, TPH-O, and Benzene
 First Quarter 2016
 BP West Coast Products Terminal 21T , Seattle, Washington

Well	Date	TPH-G WTPH-G (µg/L)	TPH-D WTPH-DX (µg/L)	TPH-O WTPH-DX (µg/L)	Benzene (µg/L)
Plant 1					
GM-14S	3/9/2016	150	710	ND	ND
GM-15S	3/8/2016	100	ND	ND U	ND
GM-16S	3/9/2016	170	660	ND U	ND
GM-17S	3/9/2016	ND	ND	ND U	ND
GM-24S	3/9/2016	440	290 J	ND	ND
AR-03	3/8/2016	ND	680	ND U	ND
AMW-01	3/8/2016	ND	320 J	ND UJ	24
AMW-02	3/8/2016	ND	290	ND	1.9
AMW-03	3/8/2016	ND	250	ND U	ND
AMW-04	3/8/2016	ND	390	ND U	ND
AMW-05	3/8/2016	ND	ND	ND	ND
MW-1-T9	3/9/2016	310	2,900	ND	ND
MW-2-T9	3/9/2016	660	960	ND	ND
MW-3-T9	3/9/2016	1,000	1,400	ND U	0.87
MW-4-T9	3/8/2016	ND	ND U	ND U	ND
Plant 2					
GM-19S	3/9/2016	ND	NR	NR	ND
Cleanup Level		1,000	10,000	10,000	71
Method Reporting Limit		50	250	750	0.5

Note: Values in **bold** exceed the cleanup level.

µg/L Micrograms per liter.

ND Constituent not detected above reporting limit.

NR Not required. Well was not tested for these analyses, as per Ecology approval. redevelopment activities.

TPH Total petroleum hydrocarbons.

TPH-D Total petroleum hydrocarbons as diesel.

TPH-G Total petroleum hydrocarbons as gasoline.

TPH-O Total petroleum hydrocarbons as oil.

WTPH-DX Washington State Method for Analysis of Diesel in Soil and Water - Extended.

WTPH-G Washington State Method for Analysis of Gasoline in Soil and Water.

J Estimated value.

UJ Not detected at an estimated value.

R Rejected value.

Table 5. Summary of Free Product Measurement Results for Groundwater
 2016 Monitoring Data
 BP West Coast Products Terminal 21T , Seattle, Washington

Well	Date	Free Product (feet)
Plant 1		
GM-11S ¹	1/13/2016	None
GM-11S ¹	2/10/2016	None
GM-11S ¹	3/16/2016	None
GM-11S ¹	4/13/2016	None
GM-11S ¹	5/18/2016	None
GM-11S ¹	6/15/2016	None
GM-12S	1/13/2016	None
GM-12S	2/10/2016	None
GM-12S	3/16/2016	None
GM-12S	4/13/2016	None
GM-12S	5/18/2016	None
GM-12S	6/15/2016	None
GM-13S	1/13/2016	None
GM-13S	2/10/2016	None
GM-13S	3/16/2016	None
GM-13S	4/13/2016	Sheen
GM-13S	5/18/2016	None
GM-13S	6/15/2016	None
Cleanup Level		No Sheen

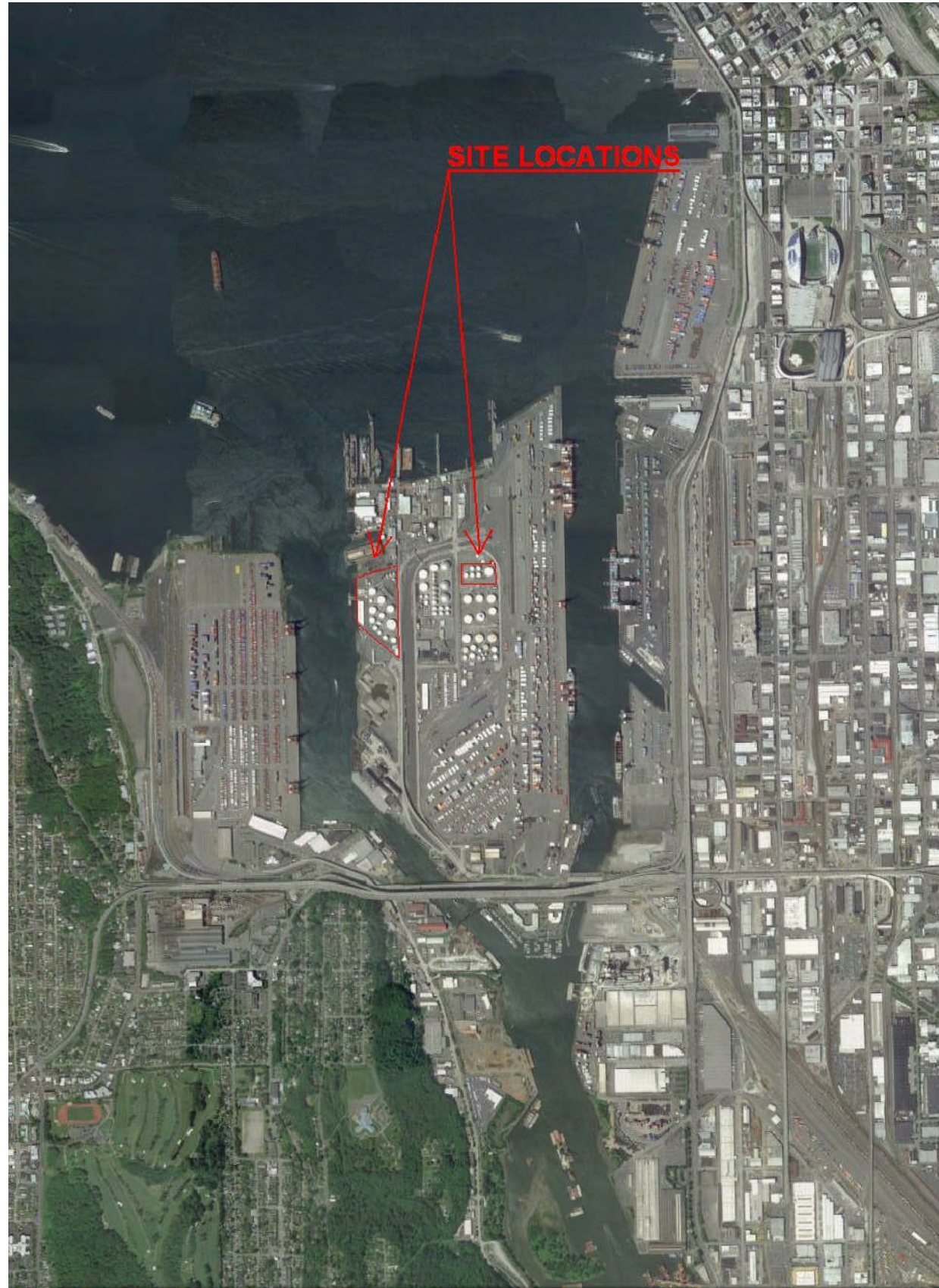
Notes: Values in **bold** exceed the cleanup level.

¹ Well GM-11S has been converted to a recovery well and product thickness was measured during pumping.

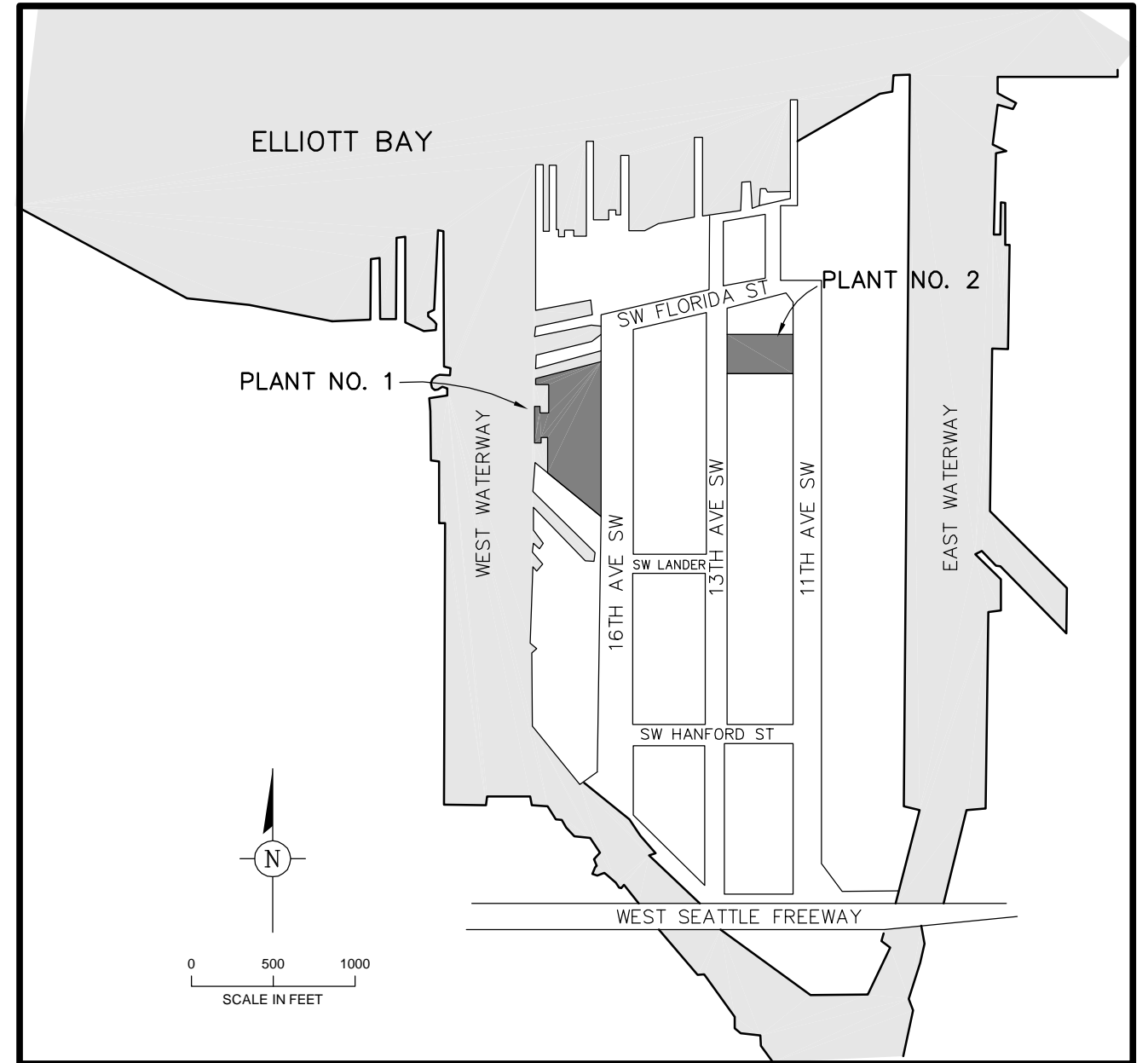
Table 6. Summary of Data Validation Results
 Groundwater Performance Monitoring
 First Quarter 2016
 BP West Coast Products Terminal 21T , Seattle, Washington

Sample ID	Constituent	Qualifier	Reason
P1-GWAMW-01-116 & P1-GWAMW-201-116, P1-GWGM-224S-116 & P1-GWGM-224S-116	Diesel & Oil	J & UJ	Relative percent difference (RPD) for this field duplicate pair exceeded the control limit of 20%. These results are, therefore, qualified as estimated values (J) or not detected at or above the reporting limit, which is approximate (UJ).
P1-GWAMW-01-116, P1-GWAMW-03-116, P1-GWAMW-04-116, P1-GWGM-15S-116, P1-GWMW-4-T9-116, P1-GWAR-03-116, P1-GWMW-3-T9-116, P1-GWGM-16S-116, P1-GWGM-17S-116, P1-GWGM-24S-116, P1-GWGM-224S-116 Rinsate-2-116	Diesel & Oil	U	Diesel and Oil were detected in the Method Blank at a concentration below the reporting limit. Associated sample results detected below the reporting limit are, therefore, qualified as undetected (U) at the reporting limit.
P1-GWAMW-201-116,	Diesel & Oil	R	Surrogate recovery greatly exceeded the control limit for this field duplicate sample. The sample results for Diesel and Oil would typically be qualified as estimated values (J); however, based on the gross exceedance of the surrogate recovery limit, and the additional quality control issues indicated by the field duplicate results (see first note above), these sample results are qualified as rejected

FIGURES



AREA PLAN



SITE PLAN

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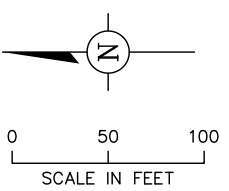
Aerial Photograph from April 2015

LEGEND

- GM-16S MONITORING WELL
- ⊕ AMW-01 PERFORMANCE/CONFIRMATION WELL
- GM-13D PERFORMANCE WELL
- ⊕ GM-13S PRODUCT PERFORMANCE WELL

Sample ID	Date	Date Sample Collected
Benzene	Benzene (EPA 8260)	
TPH-G	Total Petroleum Hydrocarbons as Gasoline (NWTPH-GX)	
TPH-D	Total Petroleum Hydrocarbons as Diesel (NWTPH-DX)	
TPH-O	Total Petroleum Hydrocarbons as Oil (NWTPH-OX)	

Notes: **Bold** - Detected concentration exceeds site specific cleanup level
 < = Not detected at listed laboratory detection limit
 All listed concentrations are reported in µg/L



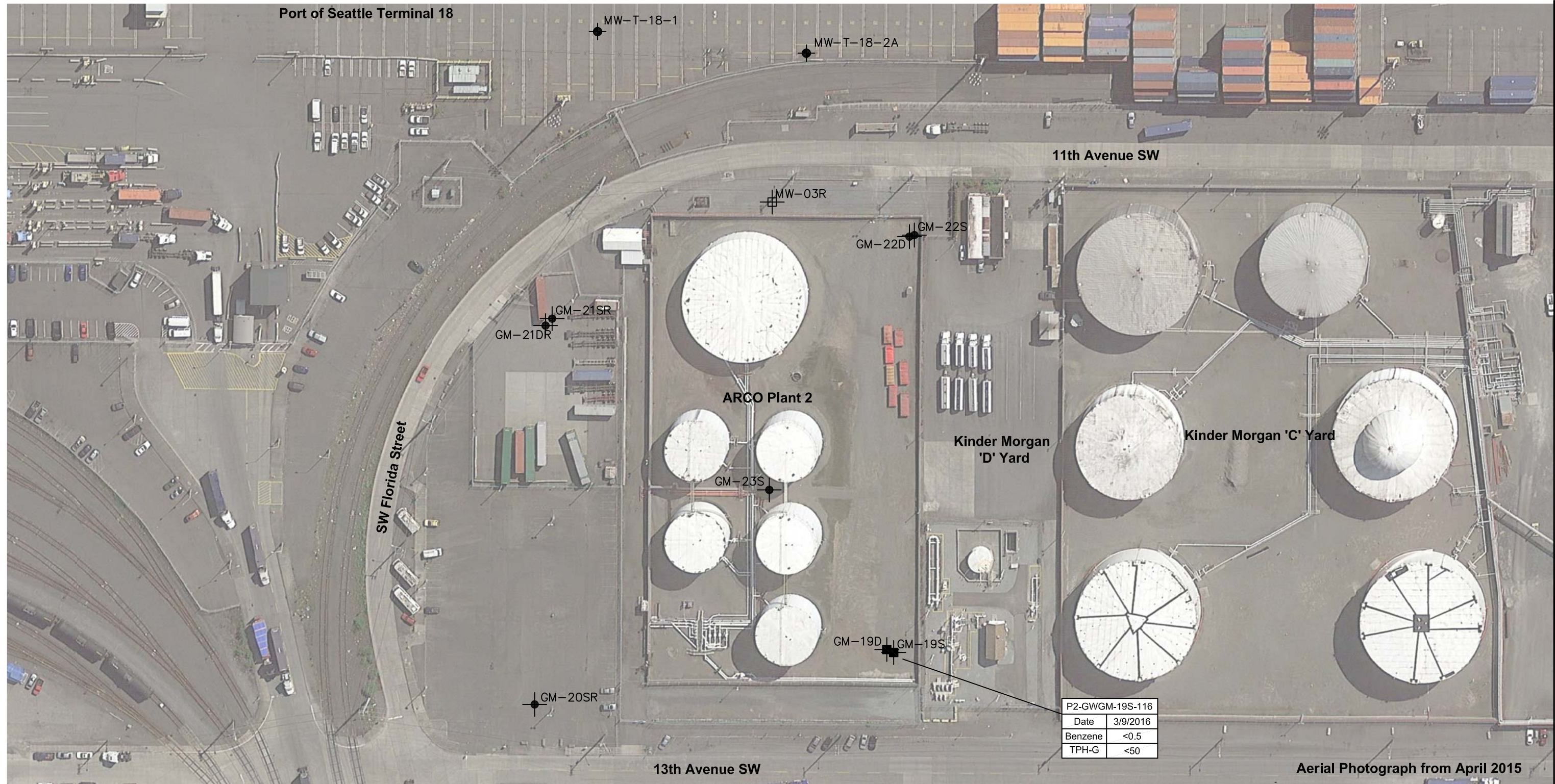
TECHSOLVE
 ENVIRONMENTAL

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Plant 1 First Quarter 2016
Groundwater Monitoring Analytical Results




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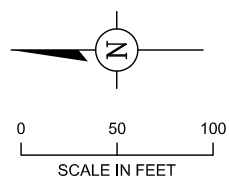
Aerial Photograph from April 2015

LEGEND

-  GROUNDWATER MONITORING WELL
-  PRODUCT PERFORMANCE WELL
-  PERFORMANCE WELL

	Sample ID
Date	Date Sample Collected
Benzene	Benzene (EPA 8260)
TPH-G	Total Petroleum Hydrocarbons as Gasoline (NWTPH-GX)

Notes: **Bold** - Detected concentration exceeds site specific cleanup level
 <= Not detected at listed laboratory detection limit
 All listed concentrations are reported in µg/L



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**Plant 2 First Quarter 2016
 Groundwater Monitoring Analytical Results**

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