

Transmitted via Electronic Mail

November 17, 2022

Ms. Sunny Becker
Washington State Department of Ecology
Toxics Cleanup Program
15700 Dayton Ave N., Shoreline, WA 98133

RE: **Quarterly Progress Report: July 1 through September 30, 2022**
Terminal 30 Cleanup Action Site, Cleanup Site ID # 4394
Consent Decree, Dated July 19, 2017

Dear Ms. Becker:

The Port of Seattle submits the attached Quarterly Progress Report for the Terminal 30 Cleanup Action per Section XI of the Consent Decree filed on July 19, 2017 (Consent Decree). The quarterly progress report consists of a brief narrative summary of notable activities that occurred during the reporting period and that are anticipated for the upcoming reporting period.

If you have any questions about this report, please contact me at 206-787-3814.

Sincerely,



Roy Kuroiwa
Project Coordinator
Port of Seattle

Distribution List:

Erin DeBroux – Northwest Seaport Alliance
Kelly Garber, Dana Brand – SSA Marine
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**Terminal 30 Cleanup Action Site
Consent Decree Dated July 19, 2017
Quarterly Progress Report: July 1 through September 30, 2022**

This report has been prepared in accordance with the requirements of the Terminal 30 (T-30) Cleanup Action Site Consent Decree between the State of Washington Department of Ecology (Ecology) and the Port of Seattle (Port). This progress report provides details on the following: 1) all on site activities; 2) any deviations from required tasks; 3) plans for recovering lost time and maintaining compliance with the schedule; 4) quality assurance/quality control review data received; and 5) work planned for the upcoming 3-month period.

Summary of the On-Site Activities Performed During the Reporting Period

- The air sparging and soil vapor extraction (AS/SVE) system was operated, and routine system checks were conducted throughout this reporting period as described in the Cleanup Action Plan (CAP). Vapor monitoring was conducted every other week per the substantive equivalent recommendations of the Puget Sound Clean Air Agency (PSCAA) permit, which identifies monthly testing. During this quarter, vapor monitoring was conducted on July 7, July 22, August 5, August 19, September 2, September 14, and September 30. A vapor sample was collected for laboratory analysis on September 14, 2022. All results achieved the destruction efficiency goal¹ of 90.0% during this reporting period.
- Monthly LNAPL gauging was completed as described in the CMP on July 14, August 11, and September 8, 2022.
- Bimonthly LNAPL recovery was completed following gauging on July 14 and September 8, 2022.
 - During the July 14 recovery event, approximately 10.12 gallons of LNAPL were extracted from 5 recovery wells (RW-1, RW-12, RW-103, RW-106, RW-107).
 - During the September 8 recovery event, approximately 11.14 gallons of LNAPL were extracted from 5 recovery wells (MW-59, RW-1, RW-12, RW-106, RW-107).

Deviations from Required Tasks

- None.

¹ The draft permit includes the following minimum destruction based on inlet TPH concentrations: efficiencies: $\geq 97\%$ if inlet TPH ≥ 200 ppmv; or $\geq 90\%$ if inlet TPH < 200 ppmv; or ≤ 10 ppmv TPH at the outlet of the control device, measured as hexane or equivalent. Inlet concentrations during this reporting period were below 200 ppmv, and outlet concentrations were below 10 ppmv.

Compliance with the Schedule

All key upcoming milestones from the Consent Decree are shown in Table 1, below.

Table 1: T 30 Upcoming Schedule Milestones

Milestone	Consent Decree Schedule	Port's Current Schedule	Status
Performance Groundwater Monitoring – Second Year 2 Event	Not Listed	October 2021	Completed
Performance Groundwater Monitoring – First Year 3 Event	Not Listed	April 2022	Completed
Performance Groundwater Monitoring – Second Year 3 Event	Not Listed	October 2022	Pending

Quality Assurance/Quality Control Data Collected

- Vapor samples were collected from the SVE system oxidizer inlet and outlet to confirm acceptable destruction efficiencies on September 14, 2022. A detailed summary of performance and compliance monitoring, including laboratory analytical reports, will be submitted with the Annual Report – Year 2 (Fourth Quarter 2022).

Work Planned during the Upcoming Reporting Period

The following work is planned for the 4th Quarter 2022:

- AS/SVE system operation will continue as described in the CAP. Per communication with PSCAA and in accordance with permit recommendations, vapor monitoring will continue to include field monitoring with a handheld photoionization detector (PID) every other week and collection of vapor samples for laboratory analysis once each quarter.
- The continued use of the propane-fired oxidizer for SVE emissions control will be evaluated based on PSCAA allowable discharge limits. A recommendation will be provided to Ecology for review and approval.
- Monthly well gauging will continue, and free product will be recovered in December. Product recovery frequency will be decreased from bimonthly (every two months) to quarterly (every three months) due to reduced recovery rates.
- Future free product recovery methods and frequency will be evaluated to determine the most efficient means of recovery for the current limited residual thicknesses. A recommendation for future monitoring and recovery methods will be provided to Ecology for review and approval.
- A semi-annual performance and compliance groundwater monitoring event will be conducted on October 13 and 19. Samples will be collected from the eligible performance wells (MW-36A, MW-39A, MW-89, and MW-42, RW-9, and RW-11A), interior wells (RW-5A, and MW-93), and CPOC wells (MW-45A, MW-46B, MW-58A, MW-86B, and MW-92). One performance well (MW-59) and one interior well (RW-1) have had free product present within the prior four quarters

and will not be sampled in accordance with the CMP. The tidally influenced wells will be sampled at the appropriate time within the tidal cycle as described the CMP.

- The interior wells that require semi-annual gauging (MW-35 MW-36, MW-54, and MW-64) will be gauged in October during the sampling event.
- The Annual Terminal 30 Site Performance Report – Year 2 will be submitted to Ecology. This report will summarize the second year of system operation, LNAPL gauging and recovery, and groundwater monitoring. This report will also provide an evaluation of system performance and provide conclusions and recommendations.

End Quarterly Progress Report