



Christa Colouzis  
Department of Ecology  
15700 Dayton Ave. N.  
Shoreline, WA 98133-9716

**Status Report for Third Quarter 2023  
Port of Seattle Terminal 91 Site  
Agreed Order Numbers DE 8938 and DE 24768**

Mott MacDonald  
1601 5th Avenue  
Suite 800  
Seattle  
WA 98101  
United States of America

T +1 (206) 838 2886  
mottmac.com

October 5, 2023

Dear Christa,

This quarterly status report for the Terminal 91 Site (T91 Site) is submitted to you on behalf of the Port of Seattle (Port) as required under the terms of:

- Agreed Order No. DE 8938, amended by the First Amendment to Agreed Order (January 2016) (subsequent Agreed Order references here include this amendment) between the Port and the Washington Department of Ecology (Ecology); and,
- Agreed Order No. DE 24768, amended by the First Amendment to Agreed Order (May 2023)(subsequent Agreed Order references here include this amendment) between the Port and Ecology.

This quarterly status report fulfills the required reporting for both agreed orders. The status reports are combined because the T91 Site is regulated as a single site under the Resource Conservation and Recovery Act (RCRA) due to historic permitted hazardous waste operations at the site. Agreed Order DE 8938 describes ongoing work in the uplands portion of the T91 Site (hereafter referred to as Upland Areas); the portions of Agreed Order DE 8938 related to submerged lands have been satisfied. Agreed Order DE 24768 describes work for the Remedial Investigation (RI) in the submerged lands portion of the T91 Site (hereafter referred to as Submerged Lands).

## **1 Work Performed**

Work performed during the period from July through September 2023 (Third Quarter) applicable to the entire T91 Site includes, by report:

- The Status Report for Second Quarter 2023 (Mott MacDonald 2023) was submitted on July 19, 2023.

Subarea-specific work in this time period is described in the sections below.

## **1.1 Upland Areas – Agreed Order DE 8938**

### **Tank Farm Affected Area**

- Consistent with the Compliance and Monitoring Plan (CMP) (PES Environmental [PES] 2013a), and subsequent approvals (PGG 2019, Ecology 2021a), groundwater sampling and water level snapshots occur on an annual basis in August of each year. The next event is in August 2024.
- The 2023 Annual groundwater monitoring event was conducted on August 9 and 11, 2023.
- The quarterly light non-aqueous phase liquid (LNAPL) monitoring event at the Tank Farm Affected Area (TFAA) was performed on August 11, 2023 by Mott MacDonald, on behalf of the Port. The scope of work is described in the Operations and Maintenance (O&M) Plan (PES 2013b). The following observations were made and/or actions were performed:
  - LNAPL thicknesses ranged from sheen to 0.1 feet, consistent with previous measurements. LNAPL recovery was not performed because LNAPL thicknesses were less than 0.25 feet.

### **Discrete Units**

- No actions were conducted nor work products required for the discrete units during this quarter.

### **Submerged Lands**

- Ecology approved the final deliverable for the submerged lands preliminary investigation by letter dated September 28, 2018. There are no remaining work products or deliverables for the submerged lands under Agreed Order DE 8938.

## **1.2 Submerged Lands – Agreed Order DE 24768**

- There were no deliverables for Agreed Order DE 24768 in 2023 Q3. Ecology provided comments on the RI report on August 21, 2023.

## **2 Problems, Solutions and Deviations from Work Plans**

This section describes deviations from the respective Agreed Order scopes of work or associated work plans developed under the Agreed Orders.

### **2.1 Uplands Areas**

The annual groundwater monitoring event and water level snapshot schedule was adjusted from May to August of each year beginning in 2021 and for future monitoring events.

### **2.2 Submerged Lands Areas**

- There were no deviations from Work Plans in 2023 Q3.

## **3 Projected Work for October through December 2023 (Q3)**

The sections below describe the work anticipated to be performed in the Uplands and Submerged Lands portions of the T91 Site in the next quarter.

### **3.1 Uplands Areas**

Planned work in the Uplands area will occur in the Tank Farm Affected Area (TFAA).

- Mott MacDonald, on behalf of the Port, plans to perform quarterly LNAPL gauging in November 2023, as described in the CMP (PES 2013a) and O&M Plan (PES 2013b).

### **3.2 Submerged Lands Areas**

Windward Environmental, on behalf of the Port, has submitted the draft Remedial Investigation Report. The draft final Remedial Investigation Report will be submitted to Ecology in December.

The amended AO schedule requires that the Feasibility Study Work Plan is due 90 days from completion of the Port/Contractor Service Directive. Windward will begin work on the Feasibility Study Work Plan upon completion of the Port/Contractor Service Directive.

### **4 Significant Findings, Personnel Changes, Contacts**

Unless otherwise reported elsewhere in this report, there were no other significant findings, personnel changes, or contacts during the previous quarter.

### **5 Closing**

Mott MacDonald's work was performed using generally accepted hydrogeologic practices at this time and in this vicinity, for exclusive application to the T91 Site, and for the exclusive use by the Port of Seattle and its legal counsel. This is in lieu of other warranties, express or implied.

Please feel free to contact me if you have any questions or comments regarding this quarterly status report.

Regards,



Glen Wallace PhD LHG RG  
Hydrogeologist In House Consultant  
(206) 212-0302  
glen.wallace@mottmac.com

**cc:**

Christa Colouzis, Department of Ecology  
Kathy Bahnick, Port of Seattle  
Joanna Florer, Port of Seattle (PDF only)  
Jalyn Buckley, Port of Seattle (PDF only)  
Elizabeth Black, Port of Seattle (PDF only)  
Brian Knox, K&L Gates (PDF only)  
Glen Wallace, PGG (PDF only)  
Janet Knox, PGG (PDF only)  
Paul Kalina, AECOM (PDF only)  
Susan McGroddy, Windward (PDF only)

**Attachments:**

Updated Agreed Order No. DE 8938 Exhibit C (Revised 1/8/2019)

**References**

Ecology, 2019. Letter from Tom Mackie, Re: Approval: transition to Annual Confirmational Monitoring in the Tank Farm Affected Area. September 18, 2019.

Ecology, 2021a. Letter from Tom Mackie, Re: Approval: transition to Annual Confirmational Monitoring in the Tank Farm Affected Area Approval (with comments) of Annual Compliance Monitoring Report (November 2019 through August 2020) Terminal 91 Tank Farm Affected Area Seattle, Washington. January 8, 2021.

Ecology, 2021b. Letter from Christa Colouzis, Re: Ecology/Port of Seattle Agreed Order No. DE 24768, Approval of RI WP – Terminal 91 Facility Seattle, Washington. June 3, 2021.

Pacific Groundwater Group [PGG], 2019 TFAA Compliance Monitoring Recommendation and Statistical Analysis, Port of Seattle Terminal 91 Site. August 20, 2019.

Mott MacDonald, 2023. Status Report for Second Quarter 2023, Port of Seattle– Terminal 91 Site. Prepared for Port of Seattle. July 19, 2022.

PES Environmental, 2013a. Compliance Monitoring Plan, Terminal 91 Tank Farm Clean-up, Port of Seattle, Seattle, Washington. Prepared for Port of Seattle. July 11, 2013.

PES Environmental, 2013b. Operation and Maintenance Plan, Terminal 91 Tank Farm Cleanup, Port of Seattle, Seattle, Washington. Prepared for Port of Seattle. July 11, 2013.

Windward Environmental, 2021. Remedial Investigation Work Plan – Final. Prepared for Port of Seattle. June 3, 2021.