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STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Northwest Region Office

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March 15, 2024

Eric Lottsfeldt  
Techsolve Environmental, Inc.  
7518 NE 169th Street  
Kenmore, WA 98028  
([erik@techsolveinc.com](mailto:erik@techsolveinc.com))

**RE: SeaPort Midstream Partners, LLC. Harbor Island Terminal Biodiesel Distribution System Upgrades Notification; Consent Decree No: 00-2-05714-8**

Dear Eric Lottsfeldt:

In accordance with Consent Decree No: 00-2-05714-8, and its associated Restrictive Covenant, dated May 30, 2000, Techsolve Environmental, Inc. (Techsolve), on behalf of SeaPort Midstream Partners, LLC. (SMP) provided notification to the Department of Ecology (Ecology) of upcoming construction activities at the Harbor Island Terminal Site (email dated February 9, 2024).

Per the email and associated construction documents, the purpose of the project is to increase rail off-loading capabilities and add necessary piping to a new biodiesel blending system. The majority of the construction will take place along the rail spur north of the Tank Farm, as well as some improvements in the Loading Rack area.

The majority of the proposed construction will either be above grade or within existing utility corridors near the rail spur and loading rack, and along the tank farm walls. Subsurface disturbance is limited to two new pipe support footings and modification to two existing pipe support footings. Estimated maximum depths of excavation for the two new pipe support footings are eight feet and three feet below ground surface. The modified pipe support structures will be approximately one foot below ground surface.

Per site information provided by Techsolve, the deeper (eight foot) footing excavation is expected to encounter groundwater, and a groundwater management plan is currently being developed. The proposed areas of excavation is outside of areas of known Site soil contamination as defined in the Restrictive Covenant.

We understand that pumped groundwater will be handled in accordance with a construction groundwater management plan. Construction dewatering duration associated with the footing installation is expected to be minimal, with water encountered during pipe support pier installation to be pumped to temporary on-site holding tanks prior to decanting and discharge via the facility groundwater remediation system. Incidental construction dewatering will not have a significant effect on Site groundwater flow. Please provide a copy of the construction groundwater management plan when prepared for Ecology's records.

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We understand that excavated soils will be temporarily contained on site prior to characterization and disposal at an appropriate licensed facility.

Ecology approves this construction activity in accordance with the Restrictive Covenant, as we understand (and Techsolve has indicated) that no new contaminant pathways will be created, and existing land use will not be altered.

Ecology requests that in-situ soil samples be collected for documentation purposes during construction. One soil sample should be collected at each new pipe support pier location from approximately three feet below ground surface after preliminary vacuum truck clearance of the work areas. Soil samples shall be analyzed for petroleum hydrocarbons consistent with known COCs and previous subsurface investigations at the Site, including TPH-G, TPH-D, and TPH-O utilizing Method NWTPH-Gx and NWTPH-Dx analytical methods, and benzene by EPA Method 8260. Please provide documentation of the sample results, as well as excavation soil and groundwater characterization and disposal documents, upon completion of soil disposal.

If unexpected soil or groundwater conditions are observed during construction, please contact Ecology at your earliest convenience.

Please feel free to contact me by phone at 425-324-1438 or by email at [Vance.Atkins@ecy.wa.gov](mailto:Vance.Atkins@ecy.wa.gov) if you have questions about this letter.

Sincerely,



Vance Atkins, LG, LHG  
Hydrogeologist 4  
Toxics Cleanup Program, NWRO

cc: Doug Hall, TransMontaigne, ([dhall@transmontaigne.com](mailto:dhall@transmontaigne.com))  
Dhroov Shivjani, Dept of Ecology, ([Dhroov.Shivjani@ecy.wa.gov](mailto:Dhroov.Shivjani@ecy.wa.gov))