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Seattle, WA 98121

Transmitted via Electronic Mail

April 29, 2024

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

RE: **Quarterly Progress Report: January 1 through March 31, 2024**
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 206-787-3001.

Sincerely,

Jalyn Buckley
Project Coordinator
Port of Seattle

Distribution List:
Erin DeBroux – Northwest Seaport Alliance
Kelly Garber, Jason Maxwell – SSA Marine
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Terminal 30 Cleanup Action Site
Consent Decree Dated July 19, 2017
Quarterly Progress Report: January 1 through March 31, 2024

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

- Monthly light non-aqueous phase liquid (LNAPL) gauging was completed as described in the Compliance Monitoring Plan (CMP) on January 11, February 8, and March 14, 2024.
- Quarterly LNAPL recovery was completed following gauging on March 14, 2024. During that recovery event, approximately 16.09 gallons of LNAPL were extracted from 5 recovery wells (RW-1, RW-12, RW-106, RW-107, and RW-110).
- The air sparging and soil vapor extraction (AS/SVE) system was operated, and routine operation and maintenance (O&M) was conducted throughout this reporting period as described in the Cleanup Action Plan (CAP). Vapor monitoring was conducted every other week, which exceeds the substantive equivalent recommendation of monthly testing in the Puget Sound Clean Air Agency (PSCAA) notice of construction (NOC) worksheet. During this quarter, vapor monitoring was conducted on January 11 and 30, February 24 and 29, and March 14 and 28, 2024. A vapor sample was also collected for laboratory analysis on March 28, 2024. Based upon laboratory results for TPH-G (3.9 mg/m^3) and the system flowrate (173 scfm), the average SVE removal rate for this period is 0.06 lb/day TPH-G. This was well below the 2.74 lb/day average associated with PSCAA's 1000 lb/year TPH emission threshold.

Deviations from Required Tasks

- None.

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 – First Year 4 Event	Not Listed	April 2023	Completed
Performance Groundwater Monitoring – Second Year 4 Event	Not Listed	October 2023	Completed
Performance Groundwater Monitoring – First Year 5 Event	Not Listed	April 2024	Completed
Performance Groundwater Monitoring – Second Year 5 Event	Not Listed	October 2024	Pending

Quality Assurance/Quality Control Data Collected

- Vapor samples were collected from the SVE system outlet to confirm allowable emission rates on March 28, 2024. A detailed summary of performance and compliance monitoring, including laboratory analytical reports, will be submitted with the annual report.

Work Planned during the Upcoming Reporting Period

The following work is planned for the 2nd Quarter 2024:

- AS/SVE system operation is planned to 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 AS/SVE system will continue to emit direct to atmosphere with continued monitoring as described above.
- The first Year 5 Performance Groundwater Monitoring event is scheduled to include MW-59, MW-89, and RW-11A on April 11, 2024. This will be the first performance sampling at MW-59, which became eligible for sampling in January 2024 with LNAPL measurements less than 0.01 ft for four continuous quarters. This condition will be confirmed again prior to sampling.
- Monthly LNAPL gauging will continue, and quarterly LNAPL recovery is currently scheduled to be performed in June.
- Alternatives for LNAPL management will be evaluated - including alternative methods and frequency of recovery. The evaluation is to determine recommendations for more efficient and or effective future management practices based upon current limited residual thicknesses and asymptotic decline in recovery volumes. We will also evaluate the potential to cease future LNAPL recovery.
- The Annual Terminal 30 Site Performance Report for Year 2 (2021) and Year 3 (2022) will be submitted to Ecology. The reports will summarize the second and third years of system operation, LNAPL gauging and recovery, and groundwater monitoring. The reports will also provide an evaluation of system performance and provide conclusions and recommendations.

- The Annual Terminal 30 Site Performance Report for Year 4 (2023) will be submitted to Ecology at the end of the quarter. This report will summarize the fourth year of system operation, LNAPL gauging and recovery, groundwater monitoring, and associated conclusions and recommendations.
- Schedule and attend a Teams call or in-person meeting with Ecology to review site information and discuss topics including, but not limited to, future groundwater monitoring, LNAPL recovery frequency and methods, and other updates or recommended changes and improvements to the system.

End Quarterly Progress Report