

October 18, 2024

Our Reference
60692669

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

**Status Report for Third Quarter 2024
Port of Seattle Terminal 91 Site
Agreed Order Numbers DE 8938 and DE 24768**

Dear Ms. Colouzis,

AECOM Technical Services, Inc. (AECOM) has prepared this quarterly status report for the Terminal 91 Site (T91 Site) 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 State 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 historical 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), the Feasibility Study (FS), and the draft Cleanup Action Plan (dCAP) 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 2024 (third quarter) applicable to the entire T91 Site includes, by report:

- The Status Report for Second Quarter 2024 (AECOM 2024a) was submitted to Ecology on July 19, 2024.
- The T-91 Well Decommissioning Request memorandum (AECOM 2024b) was submitted to Ecology on August 20, 2024.
- The Exposed Slope Sampling Plan (Port of Seattle 2024) was submitted to Ecology on September 18, 2024.

1.1 Uplands Areas – Agreed Order DE 8938

1.1.1 Tank Farm Affected Area

- Consistent with the Compliance and Monitoring Plan (CMP) (PES Environmental [PES] 2013a), and subsequent approvals (PGG 2019 and Ecology 2021a), groundwater sampling and water level monitoring occur on an annual basis in August of each year. The next event is scheduled for August 2025.
- The quarterly light non-aqueous phase liquid (LNAPL) monitoring event at the Tank Farm Affected Area (TFAA) was performed on August 7 and 8, 2024, by Mott MacDonald (MM), 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 non-detect to 0.24 feet, consistent with previous measurements. LNAPL recovery was not performed because LNAPL thicknesses were less than 0.25 feet.

1.1.2 Discrete Units

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

1.1.3 Submerged Lands – Agreed Order DE 8938

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

Anchor QEA and Windward, on behalf of the Port, delivered the draft Terminal 91 Submerged Lands Feasibility Study Work Plan to Ecology on April 22, 2024. Ecology provided their comments on the Feasibility Study Work Plan on June 27, 2024 (Ecology, 2024).

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 – Agreed Order DE 8938

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

2.2 Submerged Lands – Agreed Order DE 24768

There were no deviations from Work Plans in the third quarter of 2024.

3. Projected Work for October through December 2024 (Fourth Quarter)

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 – Agreed Order DE 8938

MM, on behalf of the Port, plans to perform quarterly LNAPL gauging in the TFAA in November 2024, as described in the CMP (PES 2013a) and O&M Plan (PES 2013b).

AECOM, on behalf of the Port, plans to decommission 48 inactive wells throughout the terminal in accordance with Ecology's October 11, 2024 approval of the T-91 Well Decommissioning Request memorandum (AECOM 2024b).

3.2 Submerged Lands – Agreed Order DE 24768

Windward, on behalf of the Port, has submitted the draft revised Remedial Investigation Report (Windward 2023). The final Remedial Investigation Report will be prepared following the receipt of Ecology comments.

Anchor QEA and Windward submitted the draft Feasibility Study Work Plan (Anchor QEA & Windward, 2024). The final Feasibility Study Work Plan will be submitted to Ecology on or before October 25, 2024. This revised Feasibility Study Work Plan schedule was approved by Ecology via email on September 13, 2024.

Floyd Snider, on behalf of the Port, plans to collect exposed slope samples during the Terminal Berth 6 & 8 Redevelopment project, as described in the Exposed Slope Sampling Plan (Port of Seattle 2024).

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.

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

Kind regards,
AECOM Technical Services, Inc.



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Paul Kalina, AECOM
Janet Knox, Mott MacDonald
Susan McGroddy, Windward

Enclosures:

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

References:

AECOM, 2024a. Status Report for Second Quarter 2024, Port of Seattle Terminal 91 Site, Agreed Order Numbers DE 8938 and DE 24768. July 19, 2024.

AECOM, 2024b. T-91 Well Decommissioning Request. Prepared for the Port of Seattle. August 20, 2024.

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.

Ecology, 2024. Letter from Christa Colouzis, RE: Ecology comments on Terminal 91 Submerged Lands Draft Feasibility Study Work Plan and appendices, April 2024 (FSID 24768, CSID: 2674). June 27, 2024.

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

Mott MacDonald, 2024b. 2023 Annual Compliance Monitoring Report Terminal 91 Tank Farm Affected Area. Prepared for the Port of Seattle. January 19, 2024.

Port of Seattle, 2024. Exposed Slope Sampling Plan, Terminal 91 Berths 6 & 8 Redevelopment Project. September 18, 2024.

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.

Windward Environmental, 2023. Terminal 91 Submerged Lands Remedial Investigation Revised Draft. Prepared for Port of Seattle. December 22, 2023

Exhibit C

Releases Requiring Corrective Action

Revised 1/8/19

Terminal 91 Site - Known Discrete Units of Contamination

Discrete Units to Be Addressed During Redevelopment (Section VII.C.1.a)			
	SWMU, AOC, or Other Area	Description	Status
A.1.	AOC 2	USTs and UST Releases on Terminal 91 Premises—Tanks A-G	Complete with recording of restrictive environmental covenant 8/30/17.

Discrete Units to Be Addressed under Work Plans and Schedules (Section VII.C.1.b)			
	SWMU, AOC, or Other Area	Description	Status
B.1.	SWMU 32	Oil Blending Station	Complete; Ecology letter 4/20/05
B.2.	SWMU 33	Solid Waste Yard	Complete; Ecology letter 4/20/05
B.3.	SWMU 35	Storage Area Outside Building W-47	Complete; Ecology letter 4/20/05
B.4.	SWMU 36	Storage Inside Building W-47	Complete; Ecology letter 4/20/05
B.5.	SWMU 37	Car Wash Station	Complete; Ecology letter 4/20/05
B.6.	SWMU 38	Paint and Motor Oil Waste Building C-154	Complete; Ecology letter 4/20/05
B.7.	SWMU 39	Paint Filter Waste Storage Area	Complete; Ecology letter 4/20/05
B.8.	SWMU 40	Short Fill	Complete after restrictive covenant; Ecology letter 4/20/05
B.9.	SWMU 43	Berth Stations and Valve Vaults	Complete; Ecology letter 4/20/05
B.10.	SWMU 44	Waste Oil Storage Shed	Complete; Ecology letter 4/20/05
B.11.	SWMU 45	Storm Drain at North End of Terminal 91	Complete; Ecology letter 4/20/05
B.12.	SWMU 46	Two Storm Drains at Center of Terminal 91	Complete; Ecology letter 4/20/05
B.13.	SWMU 47	Abandoned Oil/Water Separator	Complete; Ecology letter 4/20/05
B.14.	SWMU 48	Transfer Piping	Complete; Ecology letter 4/20/05

B.15.	AOC 2	USTs and UST Releases on Terminal 91 Premises—Tanks H and I	Complete; Ecology letter 4/20/05
B.16.	AOC 2	USTs and UST Releases on Terminal 91 Premises—Tank J	Complete; Ecology letter 4/20/05
B.17.	AOC 2	USTs and UST Releases on Terminal 91 Premises—Tank K	Complete; Ecology letter 4/20/05
B.18.	AOC 2	USTs and UST Releases on Terminal 91 Premises—Tank T	Complete; Ecology letter 11/16/11
B.19.	AOC 2	USTs and UST Releases on Terminal 91 Premises—Tank Z	Complete; Ecology letter 4/20/05
B.20.	AOC 4	Leaking Motor	Complete; Ecology letter 4/20/05
B.21.	AOC 5	PCB Transformer Pad	Complete; Ecology letter 4/20/05
B.22.	AOC 7--Pier 90 Area	Concrete Aprons	Complete; Ecology letter 11/16/11
	AOC 7--Pier 91 Area	Concrete Aprons (see also 1991 Soil Investigation for Pier 91 Chill Facility)	Complete; Ecology email 10/9/12
B.23.	AOC 16	Inactive Transformers	Complete; Ecology letter 4/20/05
B.24.	Other Area (from Baseline Report)	1990 PNO Pipeline Break South of Building T-38, Pier 91	Complete after restrictive covenant; Ecology letter 4/20/05
B.25.	Other Area (from Baseline Report)	1991 PNO Pipeline Break at South End of Pier 91	Complete; Ecology letter 4/20/05
B.26.	Other Area (from Baseline Report)	1994 Transformer Pad	Complete; Ecology letter 4/20/05
B.27.	Other Area (from Baseline Report)	1994 DAS Building Site Investigation	Complete; Ecology letter 4/20/05
B.28.	Other Area (from Baseline Report)--Pier 90 Area	1991 Soil Investigation for Pier 91 Chill Facility--Pier 90 Area (see also AOC 7)	Complete; Ecology letter 11/16/11
B.29.	Other Area (from Baseline Report)	1996 PNO Pipeline Alignment Soil Remediation, Pier 90	Complete; Ecology letter 11/16/11
B.30.	Other Area (from Baseline Report)	1996 PNO Pipeline Break, Pier 91	Complete; Ecology email 10/9/12
B.31.	Other Area (from Baseline Report)	1994 DAS Utility Trench Investigation	Complete; Ecology letter 11/16/11
B.32.	Other Area (Independent Cleanup)	1999 PNO Pipeline Release on Pier 90	Complete; Ecology email 3/16/12

B.33.	Other Area (Independent Cleanup)	Pier 91 Pipeline Decommissioning and Historic Pipeline Releases in the Vicinity of the Carnitech Building	Complete; Ecology email 10/9/12
B.34.	Other Area (Independent Cleanup)	Pier 91 Pipeline Decommissioning and Historic Pipeline Releases in the Vicinity of the Cruise Ship Terminal	Complete; Ecology email 10/9/12
B.35.	Other Area (Independent Cleanup)	Pier 91 Historic Pipeline Releases	Areas B & C--Complete; Ecology emails 2/3/12 and 3/16/12 Area D--Complete; Ecology email 7/17/13
B.36.	Other Area (Brownfields Investigation)	Building 136 Building 136 Hydraulic Lifts	Complete; Ecology memo emailed 12/23/13 Complete; Ecology letter 10/31/18..
B.37.	Other Area (Brownfields Investigation)	Locomotive Fueling Area	Complete; Ecology email 8/4/16
B.38.	Other Area (Brownfields Investigation)	Incinerator UST Area	Complete; Ecology email 8/4/16
B.39.	Tank Farm Affected Area Interim Action	Stormwater Sump Bottom Filling Interim Remedial Action	Complete; Ecology letter 12/7/11

Discrete Units Addressed under the Contamination Contingency Plan			
	SWMU, AOC, or Other Area	Description	Status
B.36.	[intentionally blank]	[intentionally blank]	[intentionally blank]

REFERENCES

- U.S. Environmental Protection Agency. 1994. Port of Seattle/Burlington Environmental Inc. Terminal 91 Facility, Final Resource Conservation and Recovery Act Facility Assessment. November 4, 1994.
- Kennedy/Jenks Consultants. 1996. Letter to Port of Seattle re Update on SWMUs and AOCs at Terminal 91, Port of Seattle. April 12, 1996.
- Washington Department of Ecology. 1996. Letter to Port of Seattle re Corrective Action for the Remainder of Terminal 91 Facility. July 3, 1996.
- Kennedy/Jenks Consultants. 1997. Terminal 91 Baseline Report, Terminal 91, Seattle, Washington. Prepared for Port of Seattle. April 1997.
- Roth, Susan J. 1997. Letter to Washington Department of Ecology re Transmittal of Terminal 91 Baseline Report. April 3, 1997.
- Washington Department of Ecology. 1998. Letter to Port of Seattle re Independent Remedial Action Report for the Port of Seattle Terminal 91 Facility. June 26, 1998.
- Roth Consulting. 1998. Letter to Washington Department of Ecology re Transmittal of Documents, Terminal 91 Upland Project. October 16, 1998.
- Roth Consulting. 1998. Proposed Additional Work, Terminal 91 Upland Independent Cleanup, Port of Seattle. Prepared for Port of Seattle. December 10, 1998.
- Port of Seattle. 1999. Letter to Washington Department of Ecology re Submittal of VCP Application and Clarification of 2/9/99 Meeting Minutes, Terminal 91 Upland Independent Cleanup. March 10, 1999.
- Roth Consulting. 2004. Letter to Ecology re Request for Letter Confirming No Further Action Required; Certain SWMUs, AOCs, and Other Areas; Port of Seattle Terminal 91 Independent Cleanup; Voluntary Cleanup Program Application Dated March 10, 1999. May 26, 2004.
- Washington Department of Ecology. 2005. Letter to Port of Seattle re Certain SWMUs, AOCs and Other Areas at the Port of Seattle's Terminal 91 Facility (listed under the March 10, 1999 Voluntary Cleanup Program Application as *Terminal 91 Uplands*). April 20, 2005.
- PES Environmental, Inc. 2009. Pier 90 Independent Remedial Action Report, Pier 90 Work Plan for Confirmation Sampling, and Pier 91 Work Plan for Additional Assessment, Terminal 91, Seattle, Washington. Prepared for Port of Seattle. December 29, 2009.
- Pinnacle GeoSciences. 2009. Work Plan, and Sampling and Analysis Plan, Locomotive Fueling Area and West-Central Building 136 Area Investigation, Port of Seattle Terminal 91, Seattle, Washington. Prepared for Port of Seattle. December 29, 2009.

Roth Consulting. 2010. Letter to Ecology re Request for Opinion on T91 Upland Independent Cleanup Areas, Discrete Units B.18, B.22, B.28, B.29, B.30, B.31, B.33, and B.34 from Exhibit C to Draft Agreed Order, Port of Seattle Terminal 91 Site. May 20, 2010.

Roth Consulting. 2011. Stormwater Sump Bottom Filling Interim Remedial Action Report, Terminal 91 Site–Tank Farm Affected Area. April 14, 2011. Attachment C to Status Report for First Quarter 2011 by Kennedy/Jenks Consultants dated April 20, 2011.

Washington Department of Ecology. 2011. Letter to Port of Seattle re Request for Opinion on Some of the Port of Seattle Terminal 91 Discrete Units Identified in Exhibit C of Agreed Order No. DE 7321. November 16, 2011.

Washington Department of Ecology. 2011. Letter to Port of Seattle re Approval of a Tank Farm Affected Area Interim Action at the Port of Seattle Terminal 91. December 7, 2011.

Washington Department of Ecology. 2012. Email from Galen Tritt to Susan Roth re Ecology comments on Summary report Piers 90 and 91 by Kennedy/Jenks. February 3, 2012.

Washington Department of Ecology. 2012. Email from Greg Caron to Susan Roth re T-91 independent cleanup sites B.32 and B.35. March 16, 2012.

Landau Associates. 2012. Focused Investigation Work Plan, Terminal 91 Discrete Unit B.38 (Incinerator Underground Storage Tank Area), Seattle, Washington. Prepared for Port of Seattle. June 26, 2012.

Aspect Consulting. 2012. Summary Report for Additional Assessment Activities, Pier 91, Terminal 91, Seattle, Washington. Prepared for Port of Seattle. August 22, 2012.

Washington Department of Ecology. 2012. Email from Galen Tritt to Susan Roth re FW: Summary Report for Additional Assessment Activities, Pier 91: Ecology response. October 9, 2012.

Washington Department of Ecology. 2013. Email from Galen Tritt to Susan Roth re RE: T91 - Discrete Unit B.35 Area D: Closure Report. July 17, 2013.

Landau Associates. 2013. Closure Report, Discrete Unit B.36 Area, Port of Seattle Terminal 91, Seattle, Washington. Prepared for Port of Seattle. July 24, 2013.

Washington Department of Ecology. 2013. Email from Galen Tritt to Susan Roth re *T91 - Discrete Unit B.36: Closure Report, approval* with attached memo to Kathy Bahnick, Sue Roth, and Ecology NWRO Central Records. December 23, 2013.

Washington Department of Ecology. 2016. Email from Greg Caron to Kathy Bahnick and Susan Roth re NFA request Discrete Units B 37, B 38. August 4, 2016.