

Memo



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Date:

October 6, 2023

Arcadis Project No.:

30157380

Subject:

Sulfate Application Field Implementation Plan, Kinder Morgan Liquid
Terminals, Harbor Island Terminal

This Sulfate Application Field Implementation Plan describes the procedures for field activities related to the reapplication of sulfate at the Kinder Morgan Liquid Terminals' Harbor Island Terminal located at 2720 13th Avenue SW, Seattle, Washington (site). Arcadis U.S., Inc. (Arcadis) will perform the reapplication of sulfate at the site.

OBJECTIVE

The objective of the field event is to reapply sulfate (in the form of magnesium sulfate [Epsom salt]) to the ground surface within the B, C and D yards to supplement the initial remedial sulfate application completed in June 2013 and the supplemental sulfate applications completed in September 2015, October 2016, April 2018, November 2018, December 2019, July 2021, and September 2022. This supplemental sulfate application will provide additional electron acceptors for continued anaerobic biological oxidation (ABOx) of petroleum impacts within site groundwater.

REMEDIAL DESIGN

Epsom salt, a highly soluble form of sulfate, will be applied to the ground surface in select areas within the B, C and D yards (**Figure 1**). Precipitation will act as the primary mechanism to dissolve the Epsom and residual gypsum from the initial sulfate application and allow infiltration through the unsaturated soils and into groundwater, delivering sulfate to support ABOx of petroleum compounds in groundwater. Approximately 900 milligrams per liter (mg/L) of dissolved sulfate is targeted to maintain ABOx in the application area. During dry periods of the year (typically May through September), precipitation is supplemented with surface irrigation supplied from the irrigation system installed in the B, C, and D yards.

The initial sulfate application, completed in June 2013, consisted of 264,000 pounds of gypsum and 42,000 pounds of Epsom salt dispersed across 30,000 square feet (ft²). Following the initial application, performance monitoring indicated the dissolved sulfate concentration trend in groundwater was decreasing toward an asymptotic concentration above background levels but below the target level of 900 mg/L. The asymptotic trend is attributed to the dissolution of Epsom and apparent residual gypsum. In response, supplemental sulfate applications have been implemented as follows:

- During September 2015, 16,000 pounds of Epsom salt were dispersed across 19,650 ft² (approximately 0.8 pounds per square foot [lbs/ft²]).
- During October 2016, 15,000 pounds of Epsom salt were dispersed across the B, C, and D yards. The application density in 2016 was 1.0 lbs/ft² over a 5,000 ft² area in the C and D yards and 0.85 lbs/ft² over a 12,500 ft² area in the B yard.
- During April 2018, 10,000 pounds of Epsom salt were dispersed across the B, C and D yards. The application density in April 2018 was 1.0 lbs/ft² over a 5,000 ft² area in the C and D yards and 0.5 lbs/ft² over a 10,000 ft² area in the B yard.
- During November 2018, 5,000 pounds of Epsom salt were dispersed across the C and D yards at an application density of 1.0 lbs/ft² over a 5,000 ft² area.
- During December 2019, 15,000 pounds of Epsom salt were dispersed across the B, C and D yards at an application density of 1.0 lbs/ft² over a 15,000 ft² area.
- During July 2021, 10,000 pounds of Epsom salt were dispersed across the B, C, and D yards at an application density of 1.0 lbs/ft² over a 10,000 ft² area.
- During September 2022, 15,000 pounds of Epsom salt were dispersed across the B, C, and D yards at an application density of 0.8 lbs/ft² over a 18,000 ft² area.

Sulfate concentrations in the application areas are assessed semi-annually via groundwater laboratory analysis to determine if an additional sulfate application is required to support ABOx. ABOx performance is also monitored by analyzing groundwater hydrocarbon data for biodegradation trends, which indicate that hydrocarbon concentrations within the remedial footprint are generally decreasing due to the remedial action. Additional sulfate concentration monitoring is completed monthly through the collection of in-situ conductivity readings from each of the performance monitoring wells.

Recent ABOx performance monitoring indicates sulfate concentrations are generally less than the target level of 900 mg/L. To maintain the target sulfate concentration in groundwater, a supplemental application of Epsom salt will be applied during the fourth quarter of 2023. Approximately 15,000 pounds of Epsom salt will be applied to the ground surface across approximately 13,000 ft² in the B yard and 5,000 ft² in the C and D yards. The application will deliver approximately 0.8 lbs/ft² of Epsom salt to the application area to increase sulfate concentrations above the target level.

FIELD IMPLEMENTATION

Mobilization

Epsom salt is scheduled for delivery by Univar, Inc. by October 23, 2023. The total delivery will consist of 7 pallets of Epsom salt packaged in 50-pound bags for a total of 300 bags. Pallets will be unloaded by the carrier. The pallets will be staged on the asphalt area in the southwest portion of the D yard prior to the application event. The pallets will be covered with water-proof tarpaulin and will be staged so as not to

inhibit ingress/egress of any doors, gates, ramps, or emergency equipment. Arcadis field personnel, materials, and equipment will mobilize to the site during during the week of October 23, 2023 to initiate the supplemental sulfate application field event.

Site Preparation

The density of Epsom distribution will be regulated by generating a grid layout within the application area. Three 50-pound bags will be applied to 150 square foot application cells in the B, C and D yard application areas, approximately 0.8 lb/ft² of Epsom salt. Based on this ratio, a grid will be developed and laid out in the B, C, and D yards using white ground-marking spray paint. The appropriate grid shape will be determined by field staff to adapt to infrastructure within the application area and maintain the respective application cell area density. Grids will be developed and laid out immediately prior to field application to minimize distortion of the grid layout from rain and weathering.

Surface Application

A small four-wheel utility vehicle (UTV) will be used to transport bags of Epsom from the staging location to the application areas within the B and D yards to facilitate safer navigation around the pipe racks. A truck will be utilized to transport the required Epsom to the application area within the C yard. Arcadis will place the established number of bags in each grid space prior to application. The Epsom bags shall be distributed by the field team utilizing hand tools, including some or all of the following pieces of equipment, to apply the sulfate to the ground surface:

- Wheeled broadcast spreader, filled with Epsom and walked over each grid square;
- Wheelbarrow, filled with Epsom and roughly spread out across grid square and finely spread using a rake or broom; and
- Manual spreading by cutting the bag and pouring in each grid square followed by spreading with a rake or broom.

The application method used in the field will be determined by the field team based on efficiency and facility operations and equipment with consideration to health and safety.

HEALTH AND SAFETY

Given the repetitive nature of carrying out these tasks sequentially, the field team may phase the tasks at their discretion. Carrying out the tasks of marking the grid, distributing Epsom salt sacks, and spreading in a phased manner to provide variations in job task limits the potential for injury from repetitive lifting, bending, and spreading. Since the Epsom salt will be delivered on approximately 7 pallets, work will be segmented into areas that roughly correspond to the coverage area of each pallet. Grid marking, Epsom salt staging, and spreading will be conducted sequentially in each area. This will ensure that repetitive tasks are varied frequently enough to reduce the potential for injury.

Refer to the Site-Specific Health and Safety Plan for general personal protective equipment requirements for the site and other health and safety considerations. Epsom salt is generally considered to be non-hazardous, but care should still be taken to ensure that dust is minimized during handling and spreading. Additionally, back braces may be used while loading and unloading Epsom salt bags, but they do not protect the wearer from potential back injuries sustained from poor lifting technique. Maintaining good

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body positioning, both with and without back braces, and taking adequate breaks are crucial to ensuring that the potential for back injuries is minimized.

SCHEDULE

October 23 – 25, 2023 – Apply Epsom in B, C, and D yards.

FIGURES

Figure 1 – Remedial Sulfate Application Area

