

January 17, 2025

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

**Status Report for Fourth 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 October through December 2024 (fourth quarter) applicable to the entire T91 Site includes, by report:

- The Status Report for third Quarter 2024 (AECOM 2024a) was submitted to Ecology on October 18, 2024.

1.1 Uplands Areas – Agreed Order DE 8938

1.1.1 Tank Farm Affected Area

The quarterly light non-aqueous phase liquid (LNAPL) monitoring event at the Tank Farm Affected Area (TFAA) was performed on November 1, 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 0.23 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

The draft final Terminal 91 Sediment Cleanup Unit Feasibility Study Work Plan (Port of Seattle 2024) was submitted to Ecology on October 25, 2024.

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) and the draft final Feasibility Study Work Plan (Port of Seattle 2024) was submitted to Ecology on October 25, 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 March 2025 (First 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

The Port submitted a subcontractor change notification on January 14, 2025 to notify Ecology that Holt Services Inc. (Holt), Marine Vacuum Services, Inc. (MarVac), Ground Penetrating Radar Services, LLC (GPRS), and Blaine Tech Services Inc. (Blaine Tech) have been added to the contract (AECOM 2025a).

Blaine Tech, on behalf of the Port, plans to perform quarterly LNAPL gauging in the TFAA in March 2025, as described in the CMP (PES 2013a) and O&M Plan (PES 2013b).

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.

3.2 Submerged Lands – Agreed Order DE 24768

The Port received comments from Ecology on the draft final SAP/QAPP and Work Plan on January 6 and 15, 2025, respectively. Windward on behalf the Port will work on revising the Workplan and SAP/QAPP to address these comments and submit as a revised draft final for Ecology's approval.

The Port submitted a subcontractor change notification on January 15, 2025 to notify Ecology that Cape Fear Analytical Laboratory for analysis of PCB congeners and dioxins/furans, Gravity Environmental for vessel support, and KPFF for engineering support have been added to the contract (AECOM 2025b).

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.



Jamalyn Green
Senior Engineer
AECOM
M: 206-550-5713
E: jamalyn.green@aecom.com

cc: Kathy Bahnick, Port of Seattle
Joanna Florer, Port of Seattle
Jalyn Buckley, Port of Seattle
Elizabeth Black, Port of Seattle
Brian Knox, K&L Gates
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 third Quarter 2024, Port of Seattle Terminal 91 Site, Agreed Order Numbers DE 8938 and DE 24768. October 18, 2024.

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

AECOM, 2025a. Email to Christa Colouzis from AECOM, T-91 Notification of Added Subcontractors – Agreed Order DE 8938. January 14.

AECOM, 2025b. Email to Christa Colouzis from AECOM, T-91 Notification of Added Subcontractors – Agreed Order DE 24768. January 15.

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. Draft Final Terminal 91 Sediment Cleanup Unit Feasibility Study Work Plan. October 25.

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