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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Region Office
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January 24, 2025

Larry Roberts
Techsolve Environmental
7518 NE 168th St,
Kenmore, WA 98028
(lroberts@techsolveinc.com)

RE: February 2023 Soil Staining and Storm Events

Dear Larry Roberts:

In late December 2022, a king tide combined with a storm surge event caused flooding along the Site waterfront. The combined effects of the tidal and storm events also temporarily raised the Site groundwater levels approximately two feet. An additional king tide event occurred in January, 2023, although Site flooding did not occur.

In February, 2023, an area of surficial soil staining and sheen was observed in the northwest corner of the Site near the north end of the sheet pile seawall. The staining was observed on both asphalt and gravel fill behind the seawall.

Petroleum analyses indicated that the soil staining was consistent with weathered diesel petroleum, similar to other characterized releases at the site. The petroleum concentrations were below Site-specific soil cleanup levels. Site personnel exposed and pressure tested two active subsurface diesel distribution lines in the vicinity. Both lines passed testing.

A utility vault was excavated approximately twenty feet north of the stained area in June, 2023. Groundwater encountered in the vault excavation displayed a slight sheen. Three soil samples were collected from an associated utility trench sidewalls or base, and one sample was collected from the utility vault excavation. Petroleum concentrations in the utility trench samples were below Site-specific soil cleanup levels. Diesel concentrations from the vault excavation exceeded the Site-specific soil cleanup levels. Soils associated with the utility excavation were disposed of off-Site at a licensed facility. Groundwater was sampled from three nearby monitoring wells (GM-10S, HWM-01-S, and B-007) for four quarters. Analytical results either did not contain detectable concentrations of petroleum hydrocarbons or detected

concentrations of petroleum hydrocarbons were below both the Site-specific cleanup level, as well as the MTCA Method A cleanup level.

Based on the Site observations, pipeline testing, and analytical results, the petroleum associated with the surficial staining observed after flooding and king tide events is consistent with residual contamination associated with a historic release at the Site, and not a new release. The volume and affected area appear to be limited.

No additional staining or sheens have been observed after subsequent king tide events at the Site.

Based on these findings, Ecology does not recommend additional investigations or remedial actions associated with this soil staining event. However, Site personnel and consultants shall continue to observe conditions associated with king tide and storm events, since contaminant mobilization is possible due to high groundwater levels. Although the sheet pile seawall and pre-existing foundations are protective of surface water at the location, Site personnel shall also continue monitoring of West Waterway surface water for sheens.

Ecology appreciates the PLP team's continued diligence on this project, and we appreciate their efforts in remediation and management of this Site. Please feel free to contact me by phone at (425) 324-1438 or by email at 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)
Erik Lottsfelt, Techsolve (erik@techsolveinc.com)