

Transmitted via Electronic Mail

August 11, 2025

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

RE: **Quarterly Progress Report: April 1 through June 30, 2025**  
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 206-384-6094.

Sincerely,

Jalyn Buckley  
Project Coordinator  
Port of Seattle

Distribution List:  
Erin Light – Northwest Seaport Alliance  
Kelly Garber, Jason Maxwell – SSA Marine  
Brick Spangler, Scott Silcox, Michael DeSota – Port of Seattle  
Jamalyn Green – AECOM

**Terminal 30 Cleanup Action Site  
Consent Decree Dated July 19, 2017  
Quarterly Progress Report: April 1 through June 30, 2025**

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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**

- 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 twice per month, 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 April 8 and 25; May 7 and 22; and June 4 and 19, 2025. A vapor sample was also collected for laboratory analysis on June 4, 2025. Based upon laboratory results for total petroleum hydrocarbons in the gasoline range (TPH-G) (2.06 mg/m<sup>3</sup>) and the system flowrate (182 standard cubic feet per minute [scfm]), the average SVE removal rate for this period is 0.03 pounds per day (lb/day) TPH-G. This was well below the 2.74 lb/day average associated with PSCAA's 1000 pounds per year (lb/year) total petroleum hydrocarbon (TPH) emission threshold.
- Monthly light non-aqueous phase liquid (LNAPL) gauging was completed as described in the Compliance Monitoring Plan (CMP) on April 10, May 7, and June 11, 2025. There are currently 8 wells monitored monthly per CMP protocol.
- Quarterly LNAPL recovery was completed following gauging on June 11, 2025. During the recovery event, 4 of the 8 recovery wells had measurable LNAPL (RW-1, RW-12, RW-106, and RW-110) and approximately 4.8 gallons of LNAPL were recovered. It was the lowest recovery volume on record, with the next-lowest being 10.1 gal in July 2022.
- Semiannual groundwater sampling was completed on April 10, 2025. Three wells were sampled per the CMP (RW-11A, MW-59, and MW-89) for total petroleum hydrocarbon in the diesel and lube oil range (TPH-Dx, with and without silica gel cleanup), TPH-G, and benzene, toluene, ethylbenzene, and total xylenes (BTEX). TPH-Dx concentrations remain below the cleanup level (CUL) of 500 µg/L in RW-11A and MW-89 and remain above the remedial level (REL) of 2,085 µg/L in MW-59. The TPH-Dx concentration in MW-59 increased following the November 2024 sampling event but remains consistent with historical seasonal variation. All remaining analytical results during this event were below their respective CUL and REL.
- The air sparge system continues to be optimized to deliver the highest flows possible to Zone 5 in the southernmost portion of the treatment area.

### **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 – Second Year 5 Event	Not Listed	November 2024	Completed
Performance Groundwater Monitoring – First Year 6 Event	Not Listed	April 2025	Completed
Performance Groundwater Monitoring – Second Year 6 Event	Not Listed	October 2025	Pending
Performance Groundwater Monitoring – First Year 7 Event	Not Listed	April 2026	Pending

### **Quality Assurance/Quality Control Data Collected**

- Vapor samples were collected from the SVE system outlet to confirm allowable emission rates on June 4, 2025. 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 3rd Quarter of 2025:

- 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.
- Monthly LNAPL gauging will continue, and quarterly LNAPL recovery is currently scheduled to be performed on September 11, 2025.
- Alternatives for LNAPL management will be evaluated - including alternative methods and frequency of recovery. The evaluation is to determine recommendations for more efficient and 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 5 (2024) will be submitted to Ecology. This report will summarize the fifth year of system operation, LNAPL gauging and recovery, groundwater monitoring, and associated conclusions and recommendations.
- A meeting with Ecology will be scheduled to review site information and discuss topics including, but not limited to, future groundwater monitoring, LNAPL monitoring and recovery frequency and methods, and other updates or recommended changes and improvements to site operations.

#### **End Quarterly Progress Report**