Pier 69 ● 2711 Alaskan Way
Seattle, WA 98121

Transmitted via Electronic Mail

April 29, 2025

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

RE: **Quarterly Progress Report: January 1 through March 31, 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
Paul Kalina – AECOM

Terminal 30 Cleanup Action Site
Consent Decree Dated July 19, 2017
Quarterly Progress Report: January 1 through March 31, 2025

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 January 2, 16, and 30; February 13 and 26; and March 12 and 26, 2025. A vapor sample was also collected for laboratory analysis on March 12, 2025. Based upon laboratory results for TPH-G (0.83 mg/m^3) and the system flowrate (182 scfm), the average SVE removal rate for this period is 0.01 lb/day TPH-G. This was well below the 2.74 lb/day average associated with PSCAA's 1000 lb/year TPH emission threshold.
- Monthly light non-aqueous phase liquid (LNAPL) gauging was completed as described in the Compliance Monitoring Plan (CMP) on January 16, February 13, and March 13, 2025. There are currently 8 wells that are being monitored monthly per CMP protocol.
- Quarterly LNAPL recovery was completed following gauging on March 13, 2025. During the recovery event, 4 of the 8 recovery wells had measurable LNAPL (RW-1, RW-12, RW-106, and RW-107) and approximately 10.4 gallons of LNAPL were recovered.
- On February 26, 2025, the system was modified again to optimize sparging of Zone 5 AS wells to deliver higher flows to that southernmost portion of the treatment area. Sparging flows continue to be optimized by fine-tuning relief valve positioning.
- On February 14, March 12, and March 26, 2025, soil gas measurements were collected at various monitoring points across the site to evaluate microbial activity and system influence.

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 March 12, 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 2nd 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.
- Semiannual groundwater monitoring (GWM) was completed on April 10, 2025. Sampling was conducted at the three scheduled Performance monitoring wells. Results are pending.
- Monthly LNAPL gauging will continue, and quarterly LNAPL recovery is currently scheduled to be performed on June 12, 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