

From: [Madalinski, Kelly](#)
To: [SCHATZ Jeff * DEQ](#)
Subject: Request to modify the 2025 Terminal 4 Slip 3 Annual Groundwater and LNAPL Removal Program
Date: Friday, March 7, 2025 8:45:10 AM

Hi Jeff,

Thanks again for discussing next steps on the groundwater monitoring and the light non-aqueous phase liquid (LNAPL) monitoring and removal program at the Terminal 4 Slip 3 site for 2025. The following is the summary of our discussion, including the Port's request to postpone the groundwater monitoring event scheduled for May 2025.

The Annual 2024 Groundwater Monitoring and LNAPL Removal Report for the Terminal 4 Slip 3 Upland Facility (ECSI No. 272) was submitted to DEQ on February 14, 2025. The annual report describes the results of groundwater monitoring and LNAPL monitoring and removal during 2024. The report also includes recommendations for the upcoming year. In this recent report, the Port is recommending all groundwater and LNAPL monitoring be terminated in 2025, except for one well (HC-5). And for this one well, the monitoring would be conducted on an annual basis with the analyte list limited to TPH-Dx. This recommendation was based on the results in 2024, results in prior years, and being in compliance for the upland ROD and ESD for the site. In addition, further recommendations as it relates to source control would be based upon the conclusions on the Groundwater Plume Evaluation Report. The objective of this report is to evaluate whether the groundwater has any potential impact on the sediments in Slip 3 and if this potential impact needs to be addressed by a sediment cap. The report will be submitted to EPA, DEQ, and other partners on April 30, 2025.

Based on our discussion, DEQ's preference would be to have this second report to better inform their comments and direction on the recommendations outlined in the annual upland groundwater report. The Port is aligned with DEQ's preference given these reports are somewhat linked together. However, the current approved work plan has the Port conducting a groundwater monitoring on a semi-annual basis, with the first event to be completed in May 2025. This schedule does not allow sufficient time for DEQ to issue comments on the Port's recommendations and make any potential adjustments to the 2025 groundwater and LNAPL removal program. The May sampling event entails monitoring for metals (arsenic, cadmium, chromium, copper, lead, manganese, mercury, zinc, and vanadium) and C10-C12 aliphatic hydrocarbons for monitoring wells HC-5, BE-1, BE-5, and HC-12D. The Port does not believe postponing or eliminating this sampling event will impact the overall assessment of the groundwater program when considering the recent results for these chemicals and limited scope of the sampling.

Therefore, the Port requests the upcoming May 2025 monitoring event be postponed until DEQ provides its comments and direction on the recommendations in the annual upland groundwater report.

Please feel free to follow-up with any questions.

Thanks!

Kelly