



Oregon

Kate Brown, Governor

Department of Environmental Quality

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June 23, 2021

Kelly Madalinski (via email to kelly.madalinski@portofportland.com)
Harbor Environmental Manager
Port of Portland
Portland, OR

Re: Comments on *Stormwater Evaluation Report, Terminal 4 Slip 3*
Terminal 4, Slip 3 Upland
ECSI No. 272

Dear Mr. Madalinski:

The Department of Environmental Quality reviewed the Port of Portland (Port) document entitled *Stormwater Evaluation Report, Terminal 4 Slip 3* dated May 2021. The report and associated appendices describe stormwater observations for selected basins in the area of Slip 3 to support upland source control as the Port looks ahead to a future Source Control Decision and ongoing remedial design for the in-water cleanup. Although stormwater samples were not collected from basins in Slip 3 during the investigation, useful information regarding the disposition of stormwater was obtained. DEQ offers the following comments on the report:

General Comments

- 1) Outfalls for basins that have been reliably determined not to discharge to Slip 3 should be permanently decommissioned in accordance with City requirements. This would allow DEQ to conclude that there was no possibility for future discharge and SCMs would be unnecessary.
- 2) DEQ has continuing concerns about stormwater conditions in basin D. The existing data are approaching 14 years in age. Secondly, while DEQ acknowledges the use of the area has remained consistent since that time, the abandonment of minor outfalls bordering Slip 3 has changed the disposition of stormwater in a way that is not yet clear. If stormwater in the catchment areas for these now-abandoned minor outfalls now flows to the main outfall, this would represent changed conditions that should be evaluated. Lastly, sampling of basin D performed under the 1200Z permit does not include BEHP and the MDLs for PAHs and PCBs are elevated relative to Table 17 CULs. DEQ believes the Port should sample the main outfall in basin D for at least these COCs.

Specific Comments

- 3) Section 3.1 Potential Contaminant Sources – DEQ agrees that historical operations (i.e., pencil pitch loading and releases from aboveground storage tanks and petroleum pipeline) resulted in contamination in the area of Slip 3 and these activities are no longer performed at Terminal 4. However, based on recent observations of LNAPL and/or high dissolved concentrations of diesel-range petroleum hydrocarbons in HC-5 and the BEBRA compliance wells, pockets of contamination remain in close proximity to Slip 3 and may represent ongoing sources.

- 4) Section 4 Ongoing Stormwater Management Measures – The removal efficiency of the Downstream Defender should be noted in this section, at both average low and high flow rates. In addition, the capture efficiency noted for the bio infiltration facility is not supported because the efficiency is specific to the design storm event, which is not identified in this section. The statement “effectively eliminating nearly all stormwater discharge from this basin” is inaccurate and should be removed and replaced by actual design criteria, specifically designed to meet the 1200-Z Tier II Corrective Action Response Design Storm Criteria to treat or infiltrate runoff from 50% of the 2-year, 24-hour design storm event and is expected to capture at least 90% of the average annual runoff.
- 5) Section 6.1 Basin D Stormwater Investigation and Source Control Measures – The Port concludes that factors including the minimal catchment area of the catch basins, lack of connectivity of impervious surfaces and non-use of these areas make the outfalls unnecessary. Based on the limited volumes of stormwater expected to be generated in the catchment areas for these minor outfalls, DEQ concurs with the Port’s conclusion. However, the ultimate fate of stormwater that previously discharged to the minor outfalls should be confirmed through observations (e.g., overland flow over the bank, infiltration in pervious areas and/or sheet flow to catch basins connected to the main basin D outfall). Observations related to the disposition of stormwater in these areas of basin D should be included as part of future source control work proposed for basins in Slip 1.
- 6) Section 6 Source Control Measures (SCMs) – Were the volumes measured and recorded for the debris and sediment removed from the catch basins in basin D during the cleanout? What was the disposition of this material? Please clarify. If the material was sampled, please include the analytical results in the report.
- 7) Section 6.1 Basin D Stormwater Investigation and Source Control Measures – Please provide information regarding whether the abandonment of minor outfalls in basin D met City requirements.
- 8) Section 7.1.1 Basins J and K2 - DEQ is intrigued that basins J and K2 were not observed to discharge during four observation events. Assuming the conclusion regarding infiltration is reliable, DEQ suggests that the stormwater lines and outfalls be decommissioned (i.e., and documentation showing compliance with City requirements provided). Once abandoned, DEQ could comfortably conclude that SCMs are not warranted for these basins.
- 9) Section 7.1.2 Data Evaluation, Basin K1 - The statement that contamination sources in basin K1 are considered “...controlled pending implementation of the SCM” is not supported and should be revised to indicate the anticipated timeframe by which the status is expected to be “controlled pending effectiveness demonstration of SCM”. Comment also applies to Figure 6.

Please provide a Response to Comment, revise the report in accordance with the comments herein provided and resubmit within 45 days. If the Port requires additional time, please contact me to arrange a mutually agreeable alternative timeframe. DEQ appreciates the continued efforts of the Port to meet its source control obligations and will continue to work collaboratively with the Port to ensure timely review of future submittals. Please contact me at by phone (503) 229-5024 or email (schatz.jeff@deq.state.or.us) if you have questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff K. Schatz", with a long horizontal flourish extending to the right.

Jeff K. Schatz, R.G.
Project Manager
Northwest Region Cleanup Program

cc: Marc Leisenring, P.E., Principal Engineer, Geosyntec
L. Alexandra Liverman, Portland Harbor Stormwater Coordinator, DEQ
Heidi Nelson, Environmental Engineer, DEQ
David Lacey, Source Control Coordinator, DEQ
Josie Clark, Remedial Project Manager, EPA Region 10

(jks:JKS)