

From: [SCHATZ Jeff * DEQ](#)
To: ["Madalinski, Kelly"](#)
Cc: [NELSON Heidi * DEQ](#); [Steve Misner](#); [Herb Clough](#)
Subject: RE: DEQ Comments on 2022 Annual Groundwater Monitoring and LNAPL Removal Report - Terminal 4 Slip 3
Date: Tuesday, May 30, 2023 12:40:03 PM

Kelly-

These responses are acceptable. As of June 1, 2023, DEQ will be using the Oregon Record Management System (ORMS) for preserving the administrative record and will cease to utilize the paper files as the official record. As a result, please provide the report in electronic (pdf) format only.

Thanks,

Jeff K. Schatz, R.G.
Project Manager and Hydrogeologist
Department of Environmental Quality
Northwest Region Cleanup Program
700 NE Multnomah Street, Suite 600
Portland, OR 97232
503-863-0810
jeff.schatz@deq.oregon.gov

From: Madalinski, Kelly <Kelly.Madalinski@portofportland.com>
Sent: Tuesday, May 23, 2023 2:54 PM
To: SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>
Cc: NELSON Heidi * DEQ <Heidi.NELSON@deq.oregon.gov>; Steve Misner <Steve.Misner@apexcos.com>; Herb Clough <Herb.Clough@ApexCos.com>
Subject: RE: DEQ Comments on 2022 Annual Groundwater Monitoring and LNAPL Removal Report - Terminal 4 Slip 3

Hi Jeff,

Thanks for the quick turn-around on the review of the revised Annual Groundwater Report for Terminal 4 Slip 3. The Port has provided (in ***bold italics***) responses to the clarifying question and comments, as follows:

1. DEQ understands that the Port would like to use Method NWEPH for future analyses for the C10-C12 Aliphatic hydrocarbons due to better alignment of reporting limits with the Portland Harbor CUL of 2.6 ppb. However, is the Port confident that the future results obtained using Method NWEPH will be reported as summed carbon ranges and not individual compounds as

in the data from the latter part of 2022? Please clarify.

The NWEPH method provides summed carbon ranges for C10-C12 aliphatic hydrocarbons; however, the MDL for this range is above the PHSS CUL. The Port recommends using this method to align with other PHSS data and since alternative methods (such as EPA method 8015) do not provide a summed carbon range.

2. DEQ's comments about the exceedance ratios relative to Portland Harbor CULs were not intended to suggest that the report should not include them. DEQ believes there is value to including the CULs in the tables for the annual report and use as a point of comparison, while acknowledging they are conservative. DEQ would like to see the inclusion of CULs, and discussion of exceedances restored.

The report will restore the inclusion of PHSS CULs, and discussion of them in the report. However, this deliverable is to fulfill the requirements of the DEQ 2003 ROD and 2004 ESD. Therefore, the appropriate criteria for comparing data for this deliverable is the criteria established in the ROD and ESD, not the PHSS CULs. Comparison to PHSS CULs are more appropriate for DEQ's source control evaluations or EPA's sufficiency assessments for the in-water remedy.

3. Based on the non-detection of TPH-D and PAHs in HC-2 and HC-6S, DEQ concurs that further source control sampling of those wells is not warranted.

Noted.

If the responses are acceptable, the Port will prepare a final copy of the report, including hard copies. Please let me know if you have any questions.

Thanks again,
Kelly

Kelly Madalinski

Harbor Environmental Mgr

LW Project Mgmt & Other

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From: SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>

Sent: Friday, May 19, 2023 11:16 AM

To: Madalinski, Kelly <Kelly.Madalinski@portofportland.com>

Cc: NELSON Heidi * DEQ <Heidi.NELSON@deq.oregon.gov>

Subject: RE: DEQ Comments on 2022 Annual Groundwater Monitoring and LNAPL Removal Report - Terminal 4 Slip 3

EXTERNAL EMAIL:

Hello Kelly-

I hope you have had a nice week and enjoyed the weather.

I received this last Friday but have been in the field on and off for much of the week to observe a critical monitoring well installation for one of my chlorinated solvent sites. I finally got a chance to start reviewing this morning. I had one clarifying question and one comment about the Port's RTC and proposed edits to Section 5.1:

1. DEQ understands that the Port would like to use Method NWEPH for future analyses for the C10-C12 Aliphatic hydrocarbons due to better alignment of reporting limits with the Portland Harbor CUL of 2.6 ppb. However, is the Port confident that the future results obtained using Method NWEPH will be reported as summed carbon ranges and not individual compounds as in the data from the latter part of 2022? Please clarify.
2. DEQ's comments about the exceedance ratios relative to Portland Harbor CULs were not intended to suggest that the report should not include them. DEQ believes there is value to including the CULs in the tables for the annual report and use as a point of comparison, while acknowledging they are conservative. DEQ would like to see the inclusion of CULs, and discussion of exceedances restored.
3. Based on the non-detection of TPH-D and PAHs in HC-2 and HC-6S, DEQ concurs that further source control sampling of those wells is not warranted.

Assuming DEQ's comments are addressed, DEQ conditionally approves the revised Annual report. Please let me know if you have questions.

Regards,
Jeff K. Schatz, R.G.
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From: Madalinski, Kelly <Kelly.Madalinski@portofportland.com>

Sent: Friday, May 12, 2023 7:39 AM

To: SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>

Cc: Steve Misner <Steve.Misner@apexcoss.com>; Herb Clough <Herb.Clough@ApexCos.com>

Subject: RE: DEQ Comments on 2022 Annual Groundwater Monitoring and LNAPL Removal Report -

Terminal 4 Slip 3

Hi Jeff,

Please find attached a revised *2022 Annual Groundwater Monitoring and LNAPL Removal Report* for the Terminal 4 Slip 3 upland. It has been revised consistent with DEQ's March 18, 2023 comments and the Port's responses to those comments, which is also attached. The revised report reflects redline/strikeout format for review of the revisions. Upon DEQ approval, the Port will send a clean, final version.

Please let me know if you have any questions.

Thanks and enjoy the weekend,
Kelly

Kelly Madalinski

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From: SCHATZ Jeff * DEQ <Jeff.SCHATZ@deq.oregon.gov>

Sent: Tuesday, March 28, 2023 2:54 PM

To: Madalinski, Kelly <Kelly.Madalinski@portofportland.com>

Cc: Herb Clough <Herb.Clough@ApexCos.com>

Subject: DEQ Comments on 2022 Annual Groundwater Monitoring and LNAPL Removal Report - Terminal 4 Slip 3

EXTERNAL EMAIL:

Hello Kelly-

I hope you are enjoying your Spring Break. DEQ is pleased to present comments on the 2022 annual report for Terminal 4 Slip 3 (see attached). Please let me know if you have questions or wish to discuss these comments further.

Regards,

Jeff K. Schatz, R.G.

Project Manager and Hydrogeologist

Department of Environmental Quality

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