



PERSONAL AND CONFIDENTIAL

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July 13, 2023

Oregon Dept. of Environmental Quality
Northwest Region Cleanup Section
Attn: Franziska Landes and Rebecca Digiustino
700 NE Multnomah Street, Suite 600
Portland, OR 97232

RE: ODEQ July 6th, 2023 Comments: Focused Soil Removal Work plan
PCB Areawide - N Bradford St. ROW, Portland, Oregon
Peninsula Iron Works, ECSI ID# 6480

Dear Franziska Landes and Rebecca Digiustino:

The letter is in response to ODEQ's July 6th, 2023 letter, which presented several comments on our June 20th, 2023 Focused Soil Removal Action Work Plan. Oregon Department of Environmental Quality's (ODEQ's) comments are outlined below (shaded). ENW's responses are presented in italics following each general and specific comment.

General Comments

1. Please note that it is PIW's responsibility to ensure this work complies with the Toxic Substance Control Act (<https://www.epa.gov/pcbs/managing-remediation-waste-polychlorinated-biphenyls-pcbs-cleanups>). If you have any questions, contact Brett Feldhahn, Environmental Protection Agency's Region 10 PCB Coordinator (Feldhahn.brett@epa.gov).

ENW has contacted the EPA to ensure our work plan is consistent with TSCA requirements. EPA requested a copy of the FINAL Work Plan.

Specific Comments

1. Page 5. Incremental Sampling Methodology. The sampling method should be consistent with past ISM samples, such as PIW's approved 2022 Work Plan for Focused Surface Soil Investigation. The sampling method should use systematic random sampling for determining the first increment location in a sampling grid, and this location relative to the grid should be repeated for all other grids. Similarly, DEQ recommends cylindrical corers, augers, ISM tools, or drills and discourages trowels or shovels to reduce sample bias in particle size. Also, please specify that the large amounts of wood debris and rocks will be removed prior to selecting the equal mass increment and clarify if the sample depth is 0 to 2 inches.

ENW clarified ISM methodology using language from PIW's approved 2022 Work Plan.

- *A stainless-steel hand auger and/or an stainless steel push probe are the preferred sample tooling and will be utilized whenever possible. Alternatives will only be utilized if necessitated by soil conditions.*
- *Section 3.2.2 indicates that wood debris and rocks will be removed prior to selecting increments.*
- *Target sample depths vary based on objective and are detailed in Tables 3-1 and 3-2.*

2. Page 7. Laboratory Sub-Sampling and Compositing. The standard operating procedure provided states only that mixing of soil samples will occur when multiple sub samples are received in separate containers. Please clarify when and how the ISM samples collected in the one 1-gallon glass container (per decision unit) will be homogenized.

ENW clarified that all sub-sampling and compositing of ISM samples will be conducted at the laboratory (see Section 3.2.6).

3. Page 8-9. Focused Soil Removal.

- a. The soil removal should be briefly described in words, as it is difficult to understand exactly where soil will be removed versus capped in Table 3-5. For example, when will confirmation samples above 0.52 mg/kg in EDUI result in further soil removal versus capping?

Soil removal is taking place in two distinct areas. It is anticipated that soil removal within area EDU01 will not exceed 1-foot bgs to achieve residual soil concentration below 0.52 mg/Kg. This area is planned to be replaced with topsoil and planted. In EDU02, only 0.5 feet of soil removal is anticipated, and the removal areas will be capped with imported ¾ inch crushed gravel after placing demarcation fabric.

- b. Please clarify how site workers will be informed about and protected from the elevated concentrations of PCBs that may be encountered during excavation.

Section 3.1 describes the Health and Safety Plan and onsite safety meetings.

4. Page 10. Confirmation Sampling.

- a. Provide information about the number and locations of the confirmation samples proposed for each decision unit following soil removal (e.g., does the "final limits of excavation areas" include the sidewalls of the excavation? Will samples be evenly spaced along the length of each decision unit?)

ISM sampling protocol was detailed in Section 3.2.2. Section 3.4 was updated to include a reference to Section 3.2.2. Sidewall sample locations are not anticipated as removal areas are adjacent to areas that are either already capped (e.g., under asphalt or railroad tracks and gravel ballast), not accessible (e.g., under the PIW building), or being assessed separately (DU10-Plus).

5. Page 10. Placement of Demarcation Fabric and Excavation Backfill.

- a. The demarcation fabric should be a highly visible color, such as orange.

This has been clarified in the work plan (see Section 3.5).

- b. Please clarify how far the fabric will extend beyond the area above 0.52 mg/kg.

This has been clarified in the work plan (see Section 3.5).

- c. Provide the specifications of the backfill material. Note that where applicable, please confirm with access agreement or permit requirements.

Backfill specifications are detailed in Section 3.5.

6. Figure 6. Removal Areas.

- a. The area between EDU02 and DU-10 needs to be addressed. Clarify if this area will be included with EDU02 in this WorkPlan or with DU-10 in the Supplement to Work Plan.

ENW added ODEQ's DU10-Plus area to the work plan and it will be included as part of the assessment of DU10.

- b. Section 2.2 Soil Sampling and Analysis states that DU10 was subdivided based on surface contours and onsite communications with DEQ regarding inferred flow patterns. While DEQ accepts DU10a, DEQ does not agree with DU10b. Adjacent subdivisions should be extended along topographic contour lines and parallel to N. Bradford St.

ENW reconfigured sub-DU margins on Figure 6, as requested. However, as stated in Section 3.2.1, ENW plans to conduct a laser level survey of surface elevation in the Action Area prior to assessment sampling. If modifications are made, ENW will provide an updated figure for DU10 to ODEQ review prior to sample collection.

- c. DEQ recommends extending EDU02 eastward to the PIW building, given the high concentrations at EB02, EB03, EB04, EB44, and EB45. If the structural integrity of the building limits excavation, the asphalt apron should be inspected for cap integrity and repaired as needed. After all excavation activities have been completed, the surface should be cleaned. During the placement of the temporary cover, DEQ observed that the asphalt apron next to the PIW building is in variable condition and does not necessarily present a good long-term cap.

This area is currently covered with asphalt. ENW clarified in the work plan that the existing asphalt apron will be inspected during removal action activities and repairs made, as necessary (see Table 3-5).

6. Table 1.

- a. Table 1 includes a column of risk-based concentrations for a park user/recreational user. DEQ has only calculated a park user RBC for PCBs at this site. Additional RBCs for other chemicals should be discussed with DEQ prior to evaluation in the report. Concurrent to PIW seeking access agreements, DEQ is available for discussions about these other RBCs.

ENW removed the calculated park user RBCs in Table 1 for all constituents except PCBs.

Please let me know if you have any additional questions or comments related to the updated work plan that was provided concurrently with this response letter or related to this project in general. We appreciated your assistance with this project.

Sincerely,

EVREN Northwest, Inc.



Evan Bruggeman, R.G.
Principal Field Geologist



Lynn D. Green, C.E.G.
Principal Engineering Geologist

CC: James Johnson, Peninsula Iron Works
Thomas Benke, Attorney

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