



Oregon

Tina Kotek, Governor

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November 20, 2023

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

**Re: Comments on *Basin L Stormwater Treatment System Performance Verification Report*
Kinder Morgan Port of Portland Terminal 4 Slip 3
ECSI No. 0272**

Dear Mr. Madalinski:

The Department of Environmental Quality (DEQ) reviewed the document entitled *Basin L Stormwater Treatment System Performance Verification Report* prepared by Maul Foster & Alongi, Inc. (MFA) on behalf of Kinder Morgan Bulk Terminals, Inc. (Kinder Morgan) and dated October 2, 2023. The report describes verification sampling for an end-of-pipe stormwater treatment source control measure (SCM) installed in Basin L in May 2022 to remove elevated levels of polynuclear aromatic hydrocarbons (PAHs). DEQ also provide EPA and the Tribes an opportunity to comment but they declined. DEQ offers the following comments on the report:

General Comments

- 1) DEQ concurs with the Port's conclusion that the Basin L SCM is operating effectively in reducing pollutant concentrations in upland stormwater and that further stormwater sampling is not necessary.

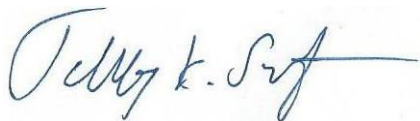
Specific Comments

- 2) Section 2 Inspection and Maintenance Summary –
 - a. Please provide additional information regarding the black material accumulation on the Aquip filter media. Was testing performed to determine its origin? What was the disposition of the material scraped from the media surface?
 - b. Please provide additional discussion regarding the need to raise the overflow indicator pipe elevation to match the elevation of the overflow pipe. How much adjustment was required and how was the problem identified?
 - c. Please provide details regarding the thickness of sediment accumulation observed on the filter media surface and the approximate volume of sediment removed. What was the disposition of the removed sediment?
- 3) Section 3.1 Pollutant Reduction Rates –
 - a. Please provide hydrographs to supplement the information regarding the stormwater sampling events performed between December 2022 and March 2013.
 - b. There is little value to comparing the detected concentrations in stormwater to the 1200-Z permit benchmarks for purposes of source control. Please remove references to permit benchmarks from the evaluations in this section.

- 4) Section 3.3 Total Volume of Stormwater Treated – As discussed in Section 2.2.2 of the Basin L SCM work plan, the treatment system can treat flow up to 950 gallons per minute. In accordance with Section 4.3 of the approved SCM work plan, please also include provide an estimate of the duration and volume of water that potentially bypassed the stormwater treatment system due to flows in excess of storm events greater than the 1.08-inch design storm listed in this section.
- 5) Summary and Recommendations – The treatment system should be operated, monitored and maintained in accordance with the manufacturer's specifications in addition to any specific 1200-Z permit performance requirements and Portland Harbor source control requirements. What is the schedule/trigger for the StormwaterRx filter changeout and replacement of media that was removed to prevent clogging in December 2022 and March 2023?
- 6) Table 3-1 Basin L Stormwater Treatment System Performance Monitoring Summary – DEQ notes that without exception the pre-filter concentrations exceeded the pump station concentrations in samples collected on January 13 and February 13, 2023. In addition, the lowest concentration reductions were noted during the January 2023 event, which coincided with the lowest detected levels of TSS. Please provide discussion regarding the likely cause for these results.
- 7) The information presented in the May 16, 2023, field form is not clear. Specifically, several of the boxes indicate yes and no for individual check-list items. If sediment accumulation was detected, please provide additional details for the related line-items.

Please prepare an RTC and revise the report in accordance with the comments provided herein. DEQ appreciates the continued efforts of Kinder Morgan and the Port to meet their source control obligations. Please contact me at by phone (503) 229-5024 or email (jeff.schatz@deq.oregon.gov) if you have questions.

Sincerely,



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

cc: Laura Hanna, Remedial Project Manager, EPA Region 10
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Brook Harmon, P.E., Project Engineer, MFA
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(jks:JKS)