

November 07, 2023

Jeff K. Schatz
Project Manager
Oregon Department of Environmental Quality
700 NE Multnomah, Suite 600
Portland, OR 97232

**Subject: Source Control Completion Letter
Terminal 4 Slip 3 Upland Facility – ECSI No. 272**

Dear Jeff:

The purpose of this letter is to provide the Oregon Department of Environmental Quality (DEQ) a summary of the completed source controls for the Terminal 4 Slip 3 Upland Facility (Facility). The Port of Portland (Port) has been conducting source investigations and implementing source control measures to identify and address potential contaminants of concern as required by DEQ pursuant to the Consent Judgement No. 0410-10234, Multnomah Circuit Court, October 7, 2004, Section 3.C.

This letter is an update to the Stormwater Evaluation Report submitted to DEQ for the Slip 3 Upland Facility in September 2021¹. In that report, the Port summarized stormwater source investigations and source control measures (SCMs) that had been completed in the four drainage basins that encompass the site boundary: Basins K1, K2, J, and D. The key finding and conclusion was that all SCMs needed to control the stormwater pathway to Slip 3 had already been implemented or would be implemented in the near future. This letter describes the final status of stormwater SCMs that have been implemented in each basin since the September 2021 report.

Basin K1

A permanent stormwater SCM for Basin K1 was constructed in 2021. This SCM consists of a pump station that diverts runoff from Basin K1 up to at least the 1200-Z Tier 2 storm (half of the 2-year storm) to a bioinfiltration basin for treatment and infiltration (Figure 1). The performance of the SCM has been verified and documented in the Basin K1 since it was constructed, including the most recent report, Bioinfiltration Basin Comprehensive Report submitted to DEQ on October 1, 2023. The report concludes that, based on the data collected to date, the bioinfiltration basin is operating as designed. The O&M Plan will continue to be followed, including reporting to DEQ. As such, Basin K1 is controlled for the stormwater pathway.

¹ Geosyntec, 2021. Stormwater Evaluation Report Terminal 4 Slip 3. Prepared for the Port of Portland. September.



Figure 1. Basin K1 Stormwater SCMs (left: diversion manhole with pump; right: bioinfiltration basin)

Basin K2

The 2021 Stormwater Evaluation Report¹ documented that there was no discharge observed from the Basin K2 outfall during four storm events in 2020 which ranged from 0.8 inches to 1.12 inches, indicating that the outfall is not active. The Port capped the outfall on August 31, 2021¹. The one remaining catch basin in Basin K2 was plugged on January 13, 2022 after investigations discovered it was connected to the Basin K1 outfall. The Port implemented additional SCMs to control ponding observed during larger storm events, including grading and scarifying the ground and installing wattles perpendicular to the slope to promote natural infiltration. Figure 2 shows photos of the SCMs in Basin K2. No major ponding has been observed in the area since implementation of the SCMs. As such, Basin K2 is controlled for the stormwater pathway.



Figure 2. Basin K2 Stormwater SCMs (left: capped Basin K2 outfall; right: scarified surface and wattles)

Basin J

Like Basin K2, no discharge was observed from the Basin J outfall during four storm events in 2020. The Port capped the outfall on August 31, 2021¹. Following the 2021 report, the Port conducted additional investigations which identified a single remaining catch basin in Basin J. This catch basin was decommissioned in May 2023. Figure 3 shows photos of the SCMs in Basin J. As such, Basin J is controlled for the stormwater pathway.



Figure 3. Basin J Stormwater SCMs (left: capped K2 outfall; right: decommissioned catch basin)

Basin D

As described in the 2021 Stormwater Evaluation Report, all five minor outfalls from Basin D to Slip 3 were cut at the slip bulkhead wall and capped on January 20, 2021 (Figure 4)¹. These five outfalls and associated infrastructure are expected to be fully removed in conjunction with future redevelopment. No notable ponding has been observed in the area since the outfalls were capped.

The only remaining stormwater discharge from Basin D is through the primary outfall to the Willamette River near Berth 414. Stormwater discharged through this outfall is treated by a Downstream Defender®, which was installed in 2004. The 2009 stormwater source control evaluation report (2009 SW SCE)² concluded that no further action was needed to control the stormwater pathway in Basin D. This conclusion is still valid¹, as land uses in this basin have not changed since the 2009 SW SCE was completed. As such, Basin D is controlled for the stormwater pathway.

² Ash Creek Associates, Inc., 2009. Stormwater Source Control Evaluation Terminal 4 Slip 1 and 3 Upland Facilities. Prepared for Port of Portland. September.



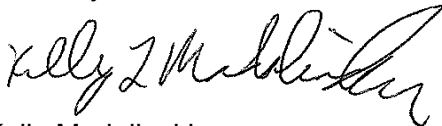
Figure 4. Basin D Stormwater SCMs (left: capped outfall STSOUT262 and STSOUT001057; right: capped outfall STSOUT263)

Summary and Conclusions

All stormwater pathways in the T4 Slip 3 Upland Facility are controlled, and all follow-up actions are complete. The status of the stormwater basins are summarized in Figure 5 (attachment). The Port recommends the appropriate next step is for DEQ to issue a source control decision for the stormwater pathway at the T4 Slip 3 Upland Facility.

Please call me at (503) 415-6676 if you have any questions.

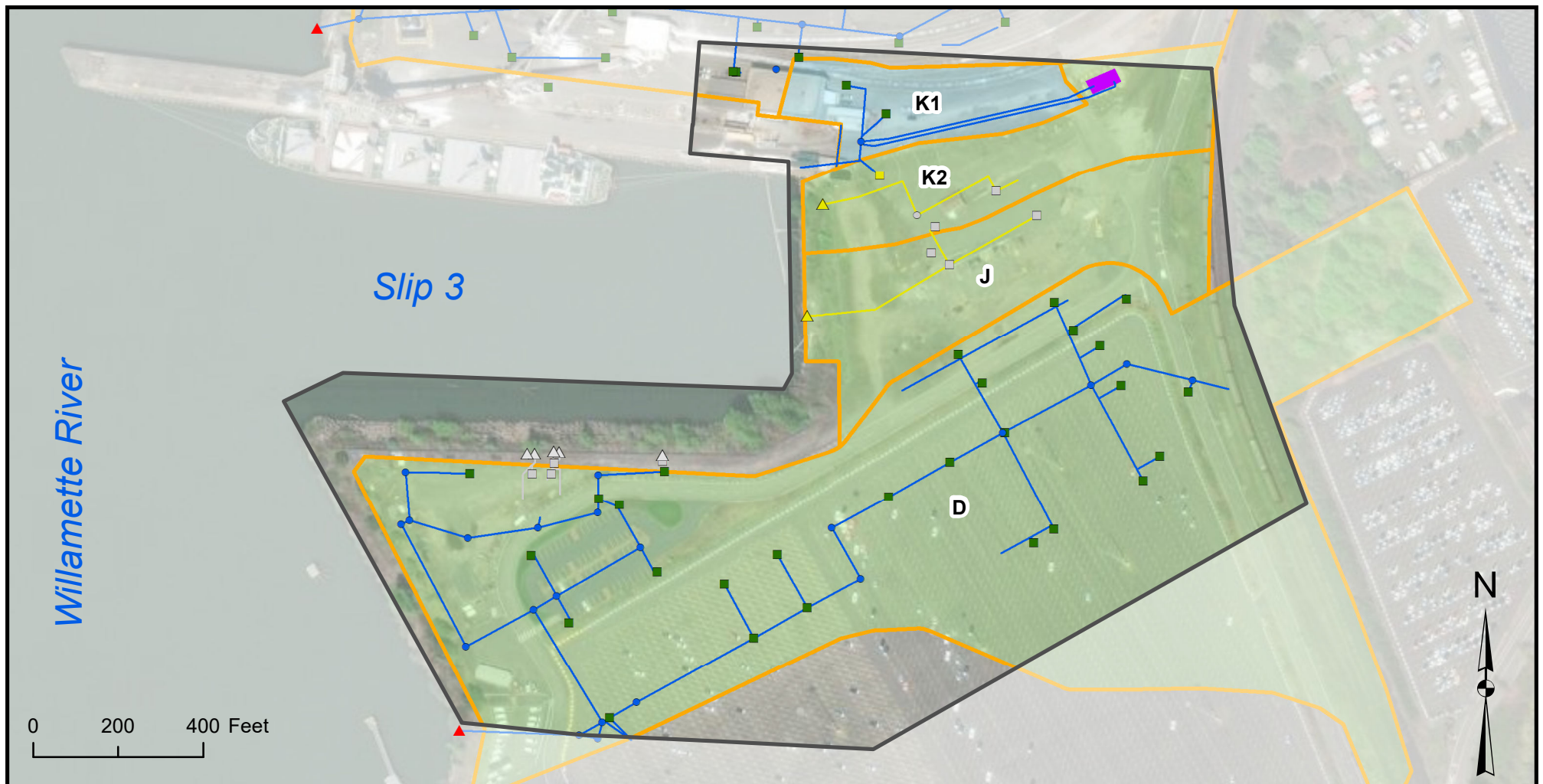
Sincerely,



Kelly Madalinski
Environmental Program Manager

ATTACHMENT:

Figure 5 Terminal 4 Slip 3 Upland Facility Current Basin Status



Legend

- Slip 3 Upland Facility
- Storm Basins
- Bioinfiltration Basin
- Basin Status**
- Controlled - No Action Needed
- Controlled - Approved O&M Plan in Place

Outfalls

- ▲ Active
- ▲ Inactive
- ▲ Abandoned

Manholes

- Active
- Abandoned

Catch Basins

- Active
- Inactive
- Abandoned

Status

- Active
- Inactive
- Abandoned

Figure 5: Terminal 4 Slip 3 Upland Facility Current Basin Status

Terminal 4 Source Control Completion Memo
Portland, OR

November 2023

Geosyntec
consultants